

VIA ELECTRONIC FILING

October 19, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Notification – WT Docket No. 02-55

Dear Ms. Dortch:

On behalf of 800 MHz Transition Administration, LLC (“TA”), by its counsel, pursuant to the Commission’s direction in its *Second Memorandum Opinion and Order*¹ in the above-captioned proceeding, I am hereby submitting a “Proposal for Adoption of an Alternative 800 MHz Band Plan and Negotiation Timetable for Puerto Rico and the U.S. Virgin Islands Economic Area” (“EA 174 Band Plan”).

Pursuant to Section 1.1206(b) of the Commission’s rules, 47 C.F.R. § 1.1206(b), this letter and attachment are being filed electronically for inclusion in the public record in the above-captioned proceeding. Please let me know if there are any questions regarding this matter.

Sincerely,

/s/ Terry F. Berman
Terry F. Berman

Attachment

¹ Improving Public Safety Communications in the 800 MHz Band, WT Docket No. 02-55, *Second Memorandum Opinion and Order*, 22 FCC Rcd 10467, ¶¶ 32-36 (2007).

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter)
)
Improving Public Safety Communications in the) WT Docket No. 02-55
800 MHz Band)

**PROPOSAL FOR ADOPTION OF AN ALTERNATIVE 800 MHZ BAND
PLAN AND NEGOTIATION TIMETABLE FOR PUERTO RICO
AND THE U.S. VIRGIN ISLANDS ECONOMIC AREA**

**THE 800 MHZ TRANSITION
ADMINISTRATOR, LLC**

John M. Bush
Brett S. Haan
BearingPoint, Inc.
1676 International Drive
McLean, VA 22102-4828
(703) 747-3000

Robert B. Kelly
Terry F. Berman
Squire, Sanders & Dempsey L.L.P.
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, DC 20044-0407
(202) 626-6600

Alan J. Boyer
Baseline Telecom, Inc.
2770 Arapahoe Road
Suite 132 - #133
Lafayette, CO 80026
(888) 361-0603

October 19, 2007

SUMMARY

As directed by the Federal Communications Commission (“FCC” or “Commission”), the 800 MHz Administrator, LLC (“TA”) submits today its proposal for adoption of an alternative band plan and negotiation timetable for the Economic Area comprising Puerto Rico and the United States Virgin Islands (“USVI”) (“EA 174”). The TA attempted to conform the alternative band plan to the standard United States 800 MHz reconfiguration band plan (“U.S. Band Plan”) to the extent feasible in order to minimize disruption to licensees, particularly those that have already begun reconfiguration. After considering various options and factors, the TA determined that extending the Expansion Band in the U.S. Band Plan by 0.5 MHz through elimination of the lower 0.5 MHz of the Guard Band for reconfiguration of the 800 MHz Band would best fulfill the Commission’s requirements for an alternative band plan. Since the USVI is in the same EA as Puerto Rico and has the same EA licensees relocating to the ESMR Band and a similar large number of site licenses that need to be relocated from the ESMR Band, the TA determined that the USVI would best be served by the same proposed band plan.

Under this plan, all non-Enhanced Specialized Mobile Radio (“ESMR”) licensees can be accommodated in the non-ESMR portion of the 800 MHz Band. No incumbent licensee in EA 174 that has been reconfigured will face additional reconfiguration. The extension of the Expansion Band will provide the additional spectrum required for clearing licensees from the remaining portion of the Guard Band, resolving combiner spacing issues and allowing some future system expansion by non-ESMR licensees.

The proposed plan includes a Guard Band of 0.5 MHz to provide separation between non-ESMR and ESMR systems. Since there are no public safety licensees located in or being relocated to the extended 0.5 MHz portion of the Expansion Band adjacent to this Guard Band,

there will continue to be at least one MHz separation between existing public safety licensees and ESMR licensees.

The TA proposes that the ESMR Band in EA 174 remain in the same channels as in the U.S. Band Plan. The TA has determined that there will not be sufficient capacity to accommodate fully all ESMR and ESMR-eligible licensees in the ESMR Band. If this plan is adopted, the TA would apportion the ESMR Band in accordance with the provisions set forth by the Commission in this proceeding's *Second Memorandum Opinion and Order*.

The TA further proposes a negotiation timetable that includes a 90-day mandatory negotiation period for all licensees after which any licensee that fails to negotiate a frequency reconfiguration agreement with Sprint Nextel would enter TA-sponsored mediation.

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
II. METHODOLOGY	4
III. ELEMENTS OF BAND PLAN	6
A. Non-ESMR Licensees	6
1. NPSPAC Licensees	7
2. Channels 1-120 Licensees	7
3. Non-ESMR Licensees in the Interleaved Band	7
4. Expansion Band Licensees	8
5. Guard Band Licensees	9
6. Non-ESMR, Non-NPSPAC Licensees above 862 MHz	10
B. ESMR Band	10
C. Application of Band Plan to the U.S. Virgin Islands (“USVI”)	11
IV. NEGOTIATION TIMETABLE	11
V. CONCLUSION	13
APPENDIX	

200 channels.³ The Commission further directed that the TA's proposed band plan include a Guard Band between the non-ESMR and ESMR Bands, but directed the TA on finding insufficient spectrum availability to accommodate a Guard Band to take such measures as necessary to protect public safety systems from interference.⁴

The Commission specified that replacement spectrum in the ESMR Band is to be assigned to ESMR licensees and ESMR-eligibles⁵ in accordance with the Commission's rules governing EA and site-based licenses.⁶ The Commission also directed that "[b]ecause of the relatively small amount of spectrum that Sprint holds in Puerto Rico, Sprint is to be assigned replacement spectrum on the same basis as other ESMR licensees, *i.e.* Sprint will receive no more spectrum in the ESMR Band than it holds currently."⁷

The Commission also set forth the criteria by which ESMR spectrum is required to be apportioned if there is insufficient spectrum in the ESMR Band to accommodate all ESMRs and ESMR-eligibles. In that case, Sprint Nextel must surrender spectrum on a *pro rata* basis to the other licensees to meet the shortfall. If insufficient spectrum remains after Sprint has surrendered spectrum, *pro rata* apportionment may be used to determine each licensee's share of the ESMR Band.⁸

³ *Id.*

⁴ *Id.*

⁵ The FCC uses the term "ESMR-eligible" to describe EA licensees that made an election to relocate to the ESMR Band, but were not operating an ESMR system as of November 22, 2004.

⁶ *Second Memorandum Opinion and Order*, at ¶ 33.

⁷ *Id.*

⁸ *Id.*

As discussed below, the TA proposes herein a band plan that it believes would best fulfill the requirements established by the Commission. Based on its analysis of spectrum use and after consideration of various options, the TA proposes herein extending the Expansion Band in the standard United States 800 MHz reconfiguration band plan (“U.S. Band Plan”) by 0.5 MHz through elimination of the lower 0.5 MHz of the Guard Band for the reconfiguration of the 800 MHz Band in EA 174. Under the TA’s proposal, all non-ESMR licensees in Puerto Rico and USVI will be fully accommodated with minimal disruption. The TA’s proposed band plan will enable the provision of a minimum of one megahertz separation between the ESMR Band and any current public safety licensee that elects to remain in the Expansion Band. In addition, the TA proposes a 0.5 megahertz Guard Band to provide separation between the non-ESMR and ESMR Bands. Finally, under the TA’s proposal there will not be sufficient capacity to fully accommodate all ESMR and ESMR-eligible licensees in the ESMR Band in EA 174.⁹ If adopted, the TA will apportion frequency assignments under this band plan in accordance with the provisions of the *Second Memorandum Opinion and Order*.¹⁰

⁹ The TA notes that in the Commission’s recent order, *In the Matter of Pendleton C. Waugh, et al.*, EB Docket No. 07-147, *Order to Show Cause and Notice of Opportunity for Hearing*, 22 FCC Rcd 13363, at ¶ 58 (2007), the Commission stated that unless the licenses of Preferred Communications Systems, Inc. and its subsidiary, Preferred Acquisitions, Inc. are revoked or otherwise terminated, the two entities have the right to relocate to comparable spectrum above 809/854 MHz and directed the TA to ensure that replacement spectrum for Preferred Acquisitions, Inc. (“PAI”) will be made available in the event that PAI relocates. In developing its alternative band plan, the TA has taken into account the spectrum requirements for the reconfiguration of the licenses owned by these two entities, which have elected to relocate these licenses to the ESMR Band.

¹⁰ See *Second Memorandum Opinion and Order*, at ¶33.

II. METHODOLOGY

Using software developed for this purpose, the TA analyzed spectrum use and availability in EA 174. In developing a band plan that would meet the Commission's requirements, the TA was guided by the Commission's objective of minimal disruption for 800 MHz licensees during reconfiguration.¹¹ The TA attempted to conform its proposed Puerto Rico and USVI band plan to the U.S. Band Plan to the maximum extent possible. The TA's proposal seeks to minimize the total number of reconfiguring licensees, thereby reducing the time and disruption attributable to band reconfiguration. To this end, the TA's proposal will ensure that any incumbent licensee in EA 174 that has been reconfigured would not face additional reconfiguration, except in the case of a licensee relocating to the ESMR Band. The TA also took steps to assure that there would be adequate channel availability for resolving combiner channel spacing issues that may arise during planning and negotiations and for modest future system growth for site-based licensees in the 800 MHz Band.

The TA concluded that the segment of the U.S. Band Band Plan located at 809-816/854-861 MHz as adopted in the *Report and Order*¹² would not adequately serve the non-NPSPAC, non-ESMR licensees in Puerto Rico. Although incumbent high-site licensees could be cleared out of the ESMR Band without any modification to the band plan, a number of the licensees would remain in the Guard Band immediately adjacent to the ESMR Band if there was no further band modification.¹³ Under the FCC's rules, licensees operating in the Guard Band above

¹¹ See Improving Public Safety Communications in the 800 MHz Band, WT Docket No. 02-55, *Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order, and Order*, 19 FCC Rcd 14969, at ¶ 2 (2004) (“*Report and Order*”).

¹² See *id.* at ¶ 151.

¹³ It is also the TA's experience from prior 800 MHz Reconfiguration Waves that licensees relocating from the ESMR Band also requested to relocate their licenses in the Guard Band to

861.3500 MHz must accept increasing amounts of interference from ESMR and cellular systems.¹⁴ Clearing the entire Guard Band (816 to 817/861 to 862 MHz) would be possible only by using essentially all available spectrum below the Guard Band. This would eliminate much of the spectrum needed to resolve combiner channel spacing issues or provide any capacity for future system expansion.

However, extending the Expansion Band by 0.5 MHz through elimination of the lower half of the Guard Band would not only provide non-ESMR licensees with sufficient spectrum but also provide the spectrum required to allow licensees to be cleared from the remaining portion of the Guard Band, resolve combiner spacing issues and provide some future system expansion. Since licensees in the Expansion Band receive full interference protection,¹⁵ there would be less concern under this solution about interference arising from proximity to the ESMR Band. In addition, the extension of the Expansion Band would not create an increase in the number of additional reconfiguration agreements requiring negotiation.¹⁶ This proposed change to the U.S. Band Plan would still preserve a one megahertz separation between ESMR systems and existing public safety licensees that might elect to remain in the Expansion Band. There would remain a half megahertz Guard Band of separation between the Expansion Band and the ESMR Band to provide better interference protection to other licensees in the Expansion Band.

avoid being adjacent to ESMR operations, from which there is the potential for interference. The TA agreed to those requests in order to provide both them and licensees relocating to the ESMR Band spectrum comparable to others in those respective bands.

¹⁴ 47 C.F.R. § 90.617(k).

¹⁵ *Report and Order*, at ¶ 154.

¹⁶ Since licensees relocating from the Guard Band would be the same as those relocating from or to the ESMR Band, these Guard Band channels can be included in the same frequency reconfiguration agreements for the licenses being reconfigured into and out of the ESMR Band.

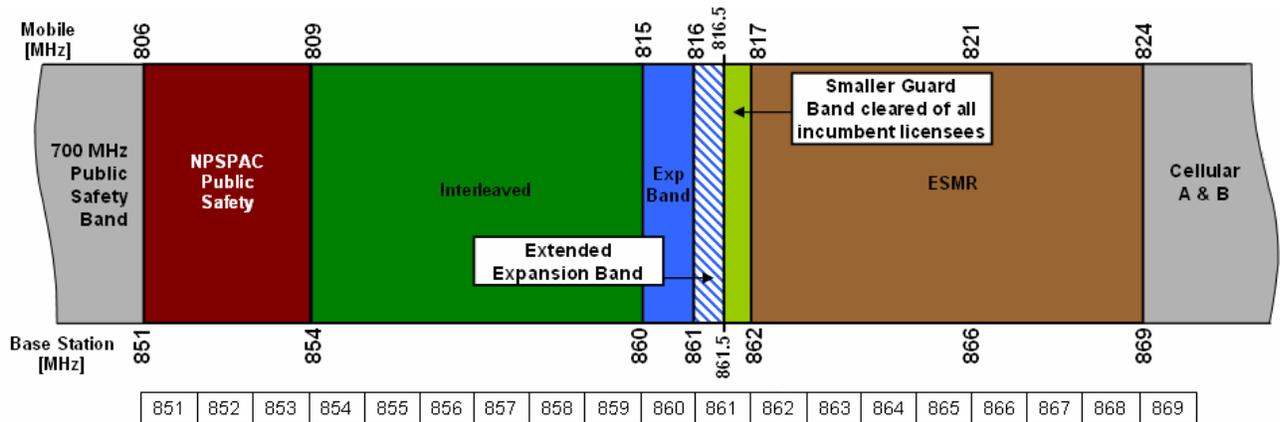
The TA determined that the ESMR Band could and should remain as originally proposed, and should not be expanded by elimination of the Guard Band. Elimination of the proposed half-megahertz Guard Band would place non-ESMR licensees immediately adjacent to ESMR licensees and increase the opportunity for interference to high-site licensees. It would also eliminate the full one megahertz separation between ESMR systems and existing public safety licensees that remain in the Expansion Band.

III. ELEMENTS OF BAND PLAN

The TA’s proposed alternative band plan for EA 174 uses as its basis the existing U.S. Band Plan, but differs in that it has a larger Expansion Band located at 815-816.5/860-861.5 MHz, which is created by eliminating the lower 0.5 MHz portion of the Guard Band at 816-816.5/861-861.5 MHz.

The proposed EA 174 (Puerto Rico/USVI) band plan is shown below:

EA 174 Alternative Band Plan



A. Non-ESMR Licensees

As stated above, all non-ESMR licensees can be accommodated in the non-ESMR Band. These include the NPSPAC licensees, and non-ESMR, non-NPSPAC site-specific and EA licensees. All replacement frequency proposals that the TA already provided to reconfiguring

licensees will remain unchanged. The attached appendix, lists the licensees that will be affected by the proposed band plan and negotiation timetable and the bands to which the TA expects these licensees would reconfigure.

1. NPSPAC Licensees

NPSPAC licensees, currently at 821-824/866-869 MHz, will reconfigure to 806-809/851-854 MHz as proposed in the U.S. Band Plan. All NPSPAC licensees are expected to move 15 MHz below their current frequencies.

2. Channels 1-120 Licensees

Consistent with the U.S. Band Plan, all licensees that were authorized on 806-809/851-854 MHz (Channels 1-120) prior to reconfiguration and that are not relocating to the ESMR Band are proposed to move into the Interleaved or Expansion Band in order to allow the relocation of NPSPAC licensees into Channels 1-120. Non-NPSPAC public safety licensees will move into the Interleaved Band, located at 809-815/854-860 MHz. Other licensees previously operating on Channels 1-120, except for licensees approved to relocate to the ESMR Band, will move between 809-816.5/854-861.5 MHz, which includes both the Interleaved Band and the Expansion Band as it is extended in the alternative band plan. Licenses approved to relocate to the ESMR Band will move to the ESMR Band above 817/862 MHz.

3. Non-ESMR Licensees in the Interleaved Band

All licensees currently operating in the Interleaved Band, except for those relocating to the ESMR Band, will remain on their current frequencies. The Interleaved Band is consistent with the U.S. Band Plan and is located between 809-815/854-860 MHz.

4. Expansion Band Licensees

The TA proposes that the Expansion Band in the U.S. Band Plan, located at 815-816/860-861 MHz, be extended to 815-816.5/860-861.5 MHz in EA 174. All non-ESMR licensees that are not public safety entities and currently operating on frequencies in the Expansion Band as extended will remain on their current frequencies.¹⁷ Consistent with the *Report and Order*, public safety licensees operating in the Expansion Band will be reconfigured unless they elect to remain in the Expansion Band.¹⁸ Public safety licensees on the Expansion Band have been given proposed new frequencies in the Interleaved Band between 809-815/854-860 MHz. The TA will reserve the frequencies that these licensees currently hold in the Expansion Band in case the licensees decide to make an election to remain prior to the submission of a frequency reconfiguration agreement. If these frequencies are not used by the public safety licensees, they will be available to accommodate future growth.

The TA proposes applying the interference rules governing Expansion Band operations rather than those governing Guard Band operations to the 816-816.5/861-861.5 MHz segment in EA 174. Although this will result in an increased burden on ESMR licensees operating between 817-817.5/862-862.5 MHz, the TA is nevertheless required to ensure that non-ESMR operations remain fully accommodated by the alternative band plan. To this end, application of the Expansion Band rules enables comparable interference protection for non-ESMR licensees in this segment of spectrum and eliminates the need to clear channels from this spectrum since licensees can remain with full interference protection. In addition, additional channels for

¹⁷ There are no public safety entities in the extended portion of the Expansion Band above 816/861 MHz. No new public safety licensees will be reconfigured into the Expansion Band, thereby preserving the minimum one megahertz separation between the ESMR Band and the closest possible public safety licensee.

¹⁸ *Report & Order*, at ¶ 154.

implementing reconfiguration and future growth will be available to non-ESMR licensees in the Expansion Band. If the entire Guard Band remained and were to be cleared of non-ESMR licensees, there would be insufficient spectrum available to resolve combiner spacing issues and to permit expansion of any high-site systems, including public safety systems.¹⁹

5. Guard Band Licensees

The TA proposes a Guard Band consisting of 816.5-817/861.5-862 MHz. The auction winners of the Upper 200 Channel EA licenses for the frequencies in the current Guard Band located at 816-817/861-862 MHz never cleared incumbent site-specific licensees from these channels. All forty frequencies in the current Guard Band are occupied by site-specific and/or EA licensees.

In the lower half of the current Guard Band, there is one EA license that covers all twenty channels. The licensee has not elected to move this license to the ESMR Band. These EA channels are also significantly encumbered by site-specific licenses, including both non-ESMR and ESMR or ESMR-eligible licensees.

All of the licensees in EA 174 in the TA's proposed Guard Band are otherwise subject to reconfiguration because they all have other licenses that require reconfiguration. Therefore, there will be no increase in the number of frequency reconfiguration agreements under the TA's proposal.

¹⁹ The TA notes that Puerto Rico is one of the few remaining markets in the United States with significant numbers of non-public safety high-site trunked systems and that there may be future need for additional growth capacity for non-public safety users as well as public safety users.

6. Non-ESMR, Non-NPSPAC Licensees above 862 MHz

All licensees between 817/862 and 821/866 MHz that are not eligible to remain in the ESMR Band will be relocated to 809-816.5/854-861.5 MHz, which includes the Interleaved and Expansion Bands of the alternative band plan. There are currently 230 non-NPSPAC licensed frequency locations on 87 different frequencies between 817-821/862-866 MHz that will require relocation.

B. ESMR Band

The TA proposes that the ESMR Band in EA 174 remain unchanged from the U.S. Band Plan and be located at 817-824/862-869 MHz. To determine the number of channels that would be required for EA licensees electing to relocate to the ESMR Band, the TA has applied the same approach used in frequency proposals for licensees in other regions. Where EA licensees relocating to the ESMR Band hold both an EA license and a site-specific license on the same frequency, the affected licenses would both be relocated to the same frequency in the ESMR Band. Any EA licensee who was operating an ESMR system in EA 174 as of November 22, 2004 would receive unencumbered spectrum for its EA channels.²⁰ ESMR-eligible EA licensees would receive only the unencumbered area, or “white space,” that the licensee had on its EA channel on November 22, 2004.²¹ In order to use spectrum within the ESMR Band most efficiently, the site-specific licenses of an ESMR-eligible would be relocated to geographic areas that are currently encumbered by third parties on its EA channels and that are not part of the EA licensee’s “white space” for that channel. Alternatively, the site-specific license of an ESMR-

²⁰ Improving Public Safety Communications in the 800 MHz Band, WT Docket No. 02-55, *Supplemental Order and Order on Reconsideration*, 19 FCC Rcd 25120, at ¶ 77 (2004) (“*Supplemental Order*”).

²¹ *Id.* at ¶ 79. These licensees are only eligible to recover transaction costs from Sprint Nextel rather than the entire cost of reconfiguring their systems to the ESMR Band.

eligible licensee may be moved to fill the contour of another site-specific licensee, which – prior to being reconfigured out of the ESMR Band – was encumbering the EA license of another ESMR-eligible licensee.²²

C. Application of Band Plan to the U.S. Virgin Islands (“USVI”)

In the *Second Memorandum Opinion and Order*, the Commission stated that the alternative band plan would be confined to Puerto Rico since no party had identified any comparable channel shortage in Puerto Rico.²³ Because both Puerto Rico and the USVI are in the same EA, EA174, and have the same EA licenses, the USVI faces the same shortage of ESMR spectrum as in Puerto Rico. Similarly, there are also high-site incumbents in the USVI to be relocated from the ESMR Band. Given these circumstances, the TA has determined that the USVI is served best by the same alternative band plan as Puerto Rico. Using the same alternative band plan for the entire EA will also permit frequency planning and future spectrum coordination to be performed more efficiently. Therefore, the TA proposes that the alternative band plan be applied to the entirety of EA 174. This will not cause any increase in the number of frequency reconfiguration agreements.

IV. NEGOTIATION TIMETABLE

All reconfiguring licensees in EA 174 must negotiate a frequency reconfiguration agreement (“FRA”) with Sprint Nextel if they have not previously negotiated an FRA for all their licenses that require reconfiguration under this plan. The TA proposes that a 90-day

²² In either instance, if a reconfiguring EA license is encumbered by an unrelated party license at its current frequency, effectively creating a hole in the licensed coverage, any EA licensee’s appropriate site-specific licenses may be used to fill that hole when the channels are relocated to the ESMR Band. In order to do this, the 22 dB μ contour of the encumbered area in the EA must be the same as or larger than the 22 dB μ contour of the license that is to be placed there when it is relocated to the ESMR Band.

²³ *Second Memorandum Opinion and Order*, fn. 70.

mandatory negotiation period be set for all licensees in EA 174 with licenses that are to be reconfigured and that were not previously placed into mandatory negotiations for these licenses.²⁴ In making this proposal, the TA is balancing the needs of licensees and Sprint Nextel for time to negotiate their FRAs with the programmatic objective of completion of rebanding in a timely manner. This group will specifically include all high-site incumbent licensees with frequencies in the Guard Band or ESMR Band between 816.5-821/861.5-866 MHz and all EA licensees electing to move to or remain in the ESMR Band. The mandatory negotiations would be conducted as required by Section 90.677(c) of the Commission's rules, 47 C.F.R. § 90.677(c). If licensees fail to negotiate an FRA during the mandatory negotiation period, they would be placed into mediation in accordance with the procedures already in place for licensees entering mediation at the end of the mandatory negotiation period. The TA recommends that specific dates for the timetable be adopted as part of an order adopting an alternative band plan.²⁵

²⁴ Obligations during the mandatory negotiation period would be the same as those for the three-month mandatory negotiation period adopted in the *Report and Order*. See *Report and Order*, at ¶ 201.

²⁵ The TA notes that because incumbent non-Sprint Nextel licensees will have to be cleared in advance of subsequent reconfigurations in the Channels 1-120, ESMR and original NPSPAC Bands to implement reconfiguration in Puerto Rico, the sequence of implementing reconfigurations will be important and will have to be addressed during negotiations. For instance, the remaining licenses in Channels 1-120 at 806-809/851-854 MHz will have to be reconfigured first to allow NPSPAC licensees to be cleared from 821-824/866-869 MHz. It is expected that certain of those Channels 1-120 reconfigurations will have to make use of currently unoccupied channels in 821-824/866 -869 MHz. Other licenses may have to be reconfigured to interim frequencies prior to being reconfigured to their final replacement channels.

V. CONCLUSION

The TA requests Commission approval of its proposed EA 174 band plan and negotiation timetable.

Respectfully submitted,

**800 MHZ TRANSITION
ADMINISTRATOR, LLC**

/s/ Robert B. Kelly

John M. Bush
Brett S. Haan
BearingPoint, Inc.
1676 International Drive
McLean, VA 22102-4828
(703) 747-3000

Robert B. Kelly
Terry F. Berman
Squire, Sanders & Dempsey L.L.P.
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, D.C. 20044-0407
(202) 626-6600

Alan J. Boyer
Baseline Telecom, Inc.
2770 Arapahoe Road
Suite 132
Box 133
Lafayette, CO 80026
(303) 444-1480

October 19, 2007

APPENDIX

Licensees Affected by Proposed EA 174 Band Plan and Negotiation Timetable

Licensee	Location	New Band
AMERICAN BEEPER COMPANY LLC	VI	Interleaved / Expansion
CANTO, LAZARO J	PR	Interleaved / Expansion
CENTRO DE COMUNICACIONES DE PTO RICO	PR	Interleaved / Expansion
CHOICE COMMUNICATIONS, L.L.C.	VI	Interleaved / Expansion
COMMUNICATIONS & INDUSTRIAL ELECTRONICS CORP	PR	Interleaved / Expansion
COMMUNICATIONS LEASING CORPORATION	PR	Interleaved / Expansion
CROWN CASTLE INTERNATIONAL CORP. DE PUERTO RICO	PR	Interleaved / Expansion
DAVILA, JOSE	PR	Interleaved / Expansion
JAYS ELECTRONICS INC	VI	Interleaved / Expansion
NEXTEL LICENSE HOLDINGS (4 AND 5), INC. DBA NEXTEL COMMUNICATIONS	PR / VI	ESMR
NORTH SIGHT COMMUNICATIONS, INC.	PR	ESMR
PONCE SMR INC	PR	Interleaved / Expansion
PREFERRED COMMUNICATIONS SYSTEMS, INC AND PREFERRED ACQUISITIONS, INC.	PR / VI	ESMR
R A ELECTRONICS & COMMUNICATIONS	PR	Interleaved / Expansion
SALADO, FREDDY	PR	Interleaved / Expansion
TRUNKED SYSTEMS PUERTO RICO INC*	PR	ESMR

* The license of Trunked Systems Puerto Rico Inc., an entity related to North Sight Communications, Inc., is included in the North Sight Communications, Inc., election for relocation of its licenses to the ESMR Band.