

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FILED/ACCEPTED  
FEB 19 2008  
Federal Communications Commission  
Office of the Secretary

In the Matter of	)	EB Docket No. 07-147
	)	
<b>PENDLETON C. WAUGH, CHARLES M. AUSTIN, and JAY R. BISHOP</b>	)	File No. EB-06-IH-2112
	)	NAL/Acct. No. 200732080025
	)	
<b>PREFERRED COMMUNICATION SYSTEMS, INC.</b>	)	FRN No. 0003769049
	)	
Licensee of Various Site-by-Site Licenses in the Specialized Mobile Radio Service.	)	
	)	
<b>PREFERRED ACQUISITIONS, INC.</b>	)	FRN No. 0003786183
	)	
Licensee of Various Economic Area Licenses in the 800 MHz Specialized Mobile Radio Service	)	
	)	

To: The Honorable Judge Arthur I. Steinberg

**ENFORCEMENT BUREAU'S**  
**MOTION TO COMPEL DOCUMENT PRODUCTION**  
**AND INTERROGATORY ANSWERS**  
**FROM JAY R. BISHOP**

The Enforcement Bureau ("Bureau"), pursuant to the Presiding Judge's instructions at the Prehearing conference in this case,<sup>1</sup> moves for an order compelling Jay R. Bishop ("Bishop") to produce responsive documents, which Bishop has withheld from production, as well as answers to Interrogatories, which Bishop has failed to provide. In support hereof, the Bureau states as follows:

<sup>1</sup> TR. at 20-21 (instructing the parties to certify that they have made a good faith effort to work out informally any discovery disputes before filing motions before the Presiding Judge). As a consequence of the Presiding Judge's directive, the Bureau maintains that the instant motion is timely, notwithstanding the filing deadlines referenced in Sections 1.323 and 1.325 of the Commission's Rules. To the extent a waiver of these rule sections may be necessary, the Bureau hereby request such on the basis of the information provided herein.

No. of Copies rec'd 046  
List A B C D E

1. On or about October 15, 2007, the Bureau filed its First Request for Production of Documents to Bishop (the “Document Requests”), appended hereto as Attachment A. Bishop’s responses were due on October 29, 2007.<sup>2</sup> Also, on or about October 15, 2007, the Bureau filed its First Interrogatories to Bishop (the “Interrogatories”), appended hereto as Attachment B. Bishop’s answers were due on November 1, 2007.<sup>3</sup> Bishop did not timely respond at all to either the Document Requests or the Interrogatories.

2. On November 5, 2007, the Bureau contacted Bishop (by email) asking if his response had been filed or if he required additional time to respond to the discovery requests. On November 6, 2007, Bishop requested an extension of time, until November 13, 2007, to respond to the Document Requests and Interrogatories. Despite its untimeliness, the Bureau granted this request.

3. On November 13, 2007, Bishop contacted the Bureau and asked for a second extension of time to respond to the Document Requests and Interrogatories, until November 21, 2007. The Bureau granted this request.

4. By November 29, 2007, the Bureau had not received any responses from Bishop. Once again, the Bureau contacted Bishop to determine if responses had been filed. Bishop did not respond to this inquiry.

---

<sup>2</sup> Although the Document Requests provided 10 days for Bishop to respond, October 25, 2007, the Bureau served him by regular mail, adding another three days to his response time, October 28, 2007. October 28, 2007 was a Sunday, however, meaning that his responses were due on October 29, 2007. *See* 47 C.F.R. § 1.4.

<sup>3</sup> The interrogatories provided Bishop 14 days, until October 29, 2007, to respond. The Bureau served him by regular mail, adding another three days to his response time, until November 1, 2007. *See* 47 C.F.R. § 1.4.

5. Because no responses had been filed or any other communication received, on December 13, 2007, the Bureau contacted Bishop and asked whether or not he had, in fact, filed discovery responses. The Bureau advised Bishop to respond to this inquiry on or before 5:00 p.m. on December 14, 2007.

6. Per the Bureau's request, Bishop responded via email on December 14. Bishop confirmed that he had not answered the Document Requests or Interrogatories due to a lack of counsel, financial constraints, and a lack of time to respond himself due to his full-time employment.<sup>4</sup> Purportedly for these reasons, Bishop then sought an extension of time, until January 18, 2008, to respond to the Bureau's discovery.

7. On December 17, 2007, the Bureau advised Bishop that it would not grant his further request for additional time, and it intended to file the instant Motion. The Bureau notes that, pursuant to the procedural schedule established in this proceeding, the deadline for serving discovery requests is February 15, 2008, and discovery must be completed by April 7, 2008.<sup>5</sup> Bishop's complete refusal or inability to respond to the Bureau's discovery requests is inexcusable and intolerable.

8. In his third request for an extension (to and including January 18, 2008), Bishop supplied no new or compelling justification to extend his time to respond to discovery. Moreover, the Bureau respectfully submits that Bishop's requested extension

---

<sup>4</sup> Bishop raised these issues on November 6, 2007, when he sought his first (untimely) extension of time within which to respond to discovery. His most recent request for a third extension fails to explain why he has been unable to respond completely, or even partially, in the two months he had been given. Notably, more than one month has elapsed since Bishop's third request for extension (including the additional time within which Bishop sought to respond) and the Bureau has yet to receive any responsive information from him.

<sup>5</sup> See *Pendleton C. Waugh, et al.*, Order, FCC07M-33 (ALJ Steinberg, Sept. 14, 2007) (setting deadline at February 15, 2008 for last day for filing or service of discovery requests and setting April 7, 2008 as the deadline for all completion of discovery).

is unreasonable and, if granted, would detract from the Bureau's ability to prepare adequately its case-in-chief.

9. The Bureau represents that it has made a good faith effort to informally resolve the dispute discussed herein, albeit to no avail, and it is filing this Motion as a last resort. Bishop has been entirely uncooperative in his failure to provide any responses to the Bureau's legitimate discovery requests.

10. In light of the foregoing, the Bureau respectfully requests the Presiding Judge to enter an order (a) compelling Bishop to respond fully and completely to the Bureau's Document Requests and Interrogatories within five days; and (b) informing Bishop that he will be subject to appropriate administrative sanctions for failing to do so.

Respectfully submitted,  
Kris Anne Monteith  
Chief, Enforcement Bureau



Gary A. Oshinsky  
Attorney, Investigations and Hearings Division



Anjali K. Singh  
Attorney, Investigations and Hearings Division

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

February 19, 2008

**ATTACHMENT A**

FILED/ACCEPTED

OCT 15 2007

Federal Communications Commission  
Office of the Secretary

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of ) EB Docket No. 07-147  
)  
PENDLETON C. WAUGH, CHARLES M. ) File No. EB-06-IH-2112  
AUSTIN, and JAY R. BISHOP ) NAL/Acct. No. 200732080025  
)  
PREFERRED COMMUNICATION ) FRN No. 0003769049  
SYSTEMS, INC. )  
)  
Licensee of Various Site-by-Site Licenses in )  
the Specialized Mobile Radio Service. )  
)  
PREFERRED ACQUISITIONS, INC. ) FRN No. 0003786183  
)  
)  
Licensee of Various Economic Area Licenses )  
in the 800 MHz Specialized Mobile Radio )  
Service )

To: Charles M. Austin

**ENFORCEMENT BUREAU'S FIRST REQUEST FOR**  
**PRODUCTION OF DOCUMENTS TO**  
**JAY R. BISHOP**

The Enforcement Bureau ("Bureau"), pursuant to Section 1.325 of the Commission's Rules, 47 C.F.R. § 1.325, hereby requests that Jay R. Bishop ("Bishop") produce the documents specified herein for inspection and copying. Production shall be made at the offices of the Investigations and Hearings Division, Enforcement Bureau, Federal Communications Commission, Suite 4-C330, 445 12<sup>th</sup> Street, S.W., Washington, DC 20554 (or at some other location that is mutually acceptable to the Bureau and Austin) within 10 days of the date of this request.

### Definitions and Instructions

- a. "Bishop" means Jay R. Bishop.
- b. "Commission" means Federal Communications Commission.
- c. "PCSF" means Preferred Communication Systems, Inc., any affiliate, d/b/a, predecessor-in-interest, parent company, wholly or partially owned subsidiary, successor-in-interest or other affiliated company or business, and all directors, officers, employees, shareholders or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period January 1, 1998 through the present.
- d. "PAI" means Preferred Acquisitions, Inc., any affiliate, d/b/a, predecessor-in-interest, parent company, wholly or partially owned subsidiary, successor-in-interest or other affiliated company or business, and all directors, officers, employees, shareholders or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period January 1, 1998 through the present.
- e. "Document" means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide,

outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, personnel file, personnel folder, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of Bishop.

f. "Relate to" and "relating to" mean constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, concerns or in any way is pertinent to the specified subject, including documents concerning the preparation of the documents.

g. "All" shall be construed to include the word "any."

h. Each Document produced shall be identified by the number of the Document request to which it is responsive, and each Document shall be produced in its entirety, even if only a portion of that Document is responsive to a request herein. This means that the Document shall not be edited, cut, or expunged, and shall include all appendices, tables, or other attachments, and all other Documents referred to in the Document or attachments. All written materials necessary to understand any Document responsive to these inquiries must also be produced.

i. If a Document responsive to any request herein existed but is no longer or not currently available, or if Bishop is unable for any reason to produce a Document responsive to any request, each such Document shall be identified by author, recipient, date, title, and specific subject matter, and a full explanation shall be provided why the Document is no longer available or why Bishop is otherwise unable to produce it.

j. If any Document produced in response to any request herein is not dated, the date on which the Document was prepared shall be provided. If any Document does

not identify its author(s) or recipient(s), the name(s) of the author(s) or recipient(s) of the Document shall be provided.

k. This request is continuing in nature, requiring immediate production if a further or different Document responsive to any request herein comes into the possession, custody, or control of Bishop during the pendency of this proceeding.

1. If production of any Document responsive to any request herein called for by this request is refused pursuant to a claim of privilege, the Document shall be identified by reference to its author, recipient(s) (including any person receiving a copy, regardless of whether that recipient is listed on the Document), date, and subject matter. The basis for the privilege claimed for such Document shall be specified with sufficient precision to permit assessment of the applicability of the privilege involved.

#### **Documents Requested**

1. All Federal and state income tax returns filed by Bishop from January 1, 1998, to the present.

2. All Documents relating to and/or evidencing each of the felony convictions of Jay R. Bishop.

3. All applications filed by or on behalf of Bishop with the Commission and all Documents relating to the planning, preparation, review and filing of such applications.

4. All applications filed by or on behalf of PCSI with the Commission and all Documents evidencing Bishop's involvement in the planning, preparation, review and filing of such applications.

5. All applications filed by or on behalf of PAI with the Commission and all Documents evidencing Bishop's involvement in the planning, preparation, review and filing of such applications.

6. All Documents relating to any financial obligations that Bishop has incurred on behalf of PCSI.

7. All Documents relating to any financial obligations that Bishop has incurred on behalf of PAI.

8. All Documents relating to the hiring, firing and/or supervising by Bishop of PCSI employees, agents and/or other personnel.

9. All Documents relating to the hiring, firing, and/or supervising by Bishop of PAI employees, agents and/or other personnel.

10. All Documents relating to any contracts, arrangements, understandings and/or agreements that Bishop has negotiated, or participated in negotiating, on behalf of PCSI.

11. All Documents relating to any contracts, arrangements, understandings and/or agreements that Bishop has negotiated, or participated in negotiating, on behalf of PAI.

12. Any Documents relating to salaries, profits, monies and/or other consideration or compensation, whether tangible or intangible, of any kind and to any extent whatsoever, that Bishop has ever earned from, or been promised, by PCSI.

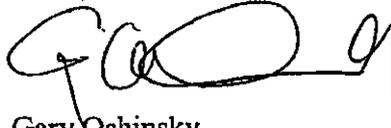
13. Any Documents relating to salaries, profits, monies and/or other consideration or compensation, whether tangible or intangible, of any kind and to any extent whatsoever, that Bishop has ever earned from, or been promised, by PAI.

14. All Documents relating to any trust that Bishop has ever formed or planned to form, or for which Bishop has been the beneficiary, for the purpose of acquiring, buying, or receiving shares of PCSI or PAI stock.

15. All Documents supporting each of Bishop's answers to the Enforcement Bureau's First Set of Interrogatories to Jay R. Bishop.

16. All Documents on which Bishop intends to rely to support any legal or factual premise or defense at any hearing in this proceeding.

Respectfully submitted,  
Kris Anne Monteith  
Chief, Enforcement Bureau



Gary Oshinsky  
Attorney, Investigations and Hearings Division



Anjali Singh  
Attorney, Investigations and Hearings Division

Federal Communications Commission  
Enforcement Bureau  
Investigations and Hearings Division  
445 12<sup>th</sup> Street, S.W., Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

October 15, 2007

**CERTIFICATE OF SERVICE**

Kerri Johnson a Paralegal Specialist in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has, on this 15<sup>th</sup> day of October, 2007, sent by first class United States mail or electronic mail, as noted, copies of the foregoing "Enforcement Bureau's First Request for Production of Documents to Jay R. Bishop" to:

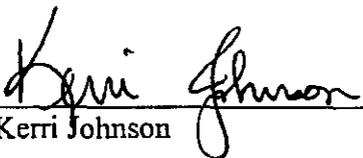
Jay R. Bishop  
c/o Michelle Bishop  
1190 South Farrell Drive  
Palm Springs, CA 92264  
jaybishopps@aol.com

David J. Kaufman\*\*  
Brown Nietert & Kaufman, Chartered  
1301 Connecticut Ave. N.W., Suite 450  
Washington, DC 20036  
david@bnkcomlaw.com  
Attorney for Preferred Communication Systems, Inc., Preferred Acquisitions, Inc., and Charles M. Austin

Robert J. Keller\*\*  
Law Offices of Robert J. Keller, P.C.  
P.O. Box 33428  
Washington, DC 20033-0428  
rjk@telcomlaw.com  
Attorney for Preferred Communication Systems, Inc., Preferred Acquisitions, Inc., and Charles M. Austin

William D. Silva\*\*  
Law Offices of William D. Silva  
5335 Wisconsin Ave., NW, Suite 400  
Washington, DC 20015-2003  
bill@luselaw.com  
Attorney for Pendleton C. Waugh

Administrative Law Judge Arthur I. Steinberg\*  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 1-C861  
Washington, D.C. 20054

  
Kerri Johnson

\* Hand-Delivered and Courtesy Copies Sent Via E-Mail

\*\* Courtesy Copies Sent Via E-Mail (E-Mail service acceptable in lieu of hard copies  
for files 4 MB or less per agreement with counsel.)

**ATTACHMENT B**

OCT 15 2007

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

Federal Communications Commission  
 Office of the Secretary

In the Matter of	)	EB Docket No. 07-147
	)	
<b>PENDLETON C. WAUGH, CHARLES M. AUSTIN, and JAY R. BISHOP</b>	)	File No. EB-06-IH-2112
	)	NAL/Acct. No. 200732080025
	)	
<b>PREFERRED COMMUNICATION SYSTEMS, INC.</b>	)	FRN No. 0003769049
	)	
Licensee of Various Site-by-Site Licenses in the Specialized Mobile Radio Service.	)	
	)	
<b>PREFERRED ACQUISITIONS, INC.</b>	)	FRN No. 0003786183
	)	
Licensee of Various Economic Area Licenses in the 800 MHz Specialized Mobile Radio Service	)	
	)	

To: Jay R. Bishop

**ENFORCEMENT BUREAU'S FIRST INTERROGATORIES**  
**TO**  
**JAY R. BISHOP**

1. The Enforcement Bureau ("Bureau"), pursuant to Sections 1.311 and 1.323 of the Commission's rules, 47 C.F.R. §§ 1.311 and 1.323, submits the following interrogatories to Jay R. Bishop ("Bishop").

2. Bishop shall deliver his responses to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12<sup>th</sup> Street, S.W., Washington, DC 20554 (or at some other location that is mutually acceptable to the Bureau and Bishop) within 14 days of the date of these interrogatories.

3. The obligation of Bishop to answer these interrogatories is continuing in nature. Bishop has an obligation to provide in the future any and all additional

responsive information that may come to his attention subsequent to its answering these interrogatories but not initially disclosed at the time, date and place set forth herein or in any supplemental answers that it submits. In this regard, Bishop must supplement his initial and supplemental responses if he learns that, in some material respect, the responses initially provided, or as supplemented, were incomplete or incorrect or if additional responsive information is acquired by or has become known to him after his initial or supplemental responses.

#### **Definitions and Instructions**

- a. As used herein, the term "Bishop" means Jay R. Bishop
- b. The term "PCSI" means Preferred Communication Systems, Inc., its subsidiaries and affiliates.
- c. The term "PAF" means Preferred Acquisitions, Inc., its parent company, subsidiaries, and affiliates.
- d. The term "Commission" means Federal Communications Commission and includes any and all Bureaus, Divisions, Branches, and offices thereof.
- e. The terms "relate to" and "relating to" mean constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or in any way is pertinent to the specified subject, including documents concerning the preparation of the documents.
- f. The term "and" also means "or" and the term "or" also means "and."
- g. The term "each" also means "every" and the term "every" also means "each."
- h. The term "all" also means "any" and the term "any" also means "all."

i. The term "identify" when used with reference to a person or persons, means to state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.

j. The term "Document" means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of Bishop.

k. The terms "authorization," "authorizations," "license" or "licenses" refer to those licenses identified in footnotes 1-2 of the Commission's Order in the above-captioned proceeding, *Pendleton C. Waugh, et al.*, Order to Show Cause and Notice of Opportunity for Hearing, FCC 07-125, released July 20, 2007.

l. With regard to each answer, identify the person(s) or document(s) relied upon by Bishop in determining the substance of the answer.

m. Unless otherwise specifically stated, all questions refer to the period of time from January 1, 1998, to the present.

**Interrogatories**

1. Identify all businesses in which Bishop has engaged. As to each such business:
  - a. Specify the name, address, and telephone number;
  - b. Specify the nature of such business;
  - c. Specify the duration of Bishop's involvement;
  - d. Describe fully the nature and extent of Bishop's involvement.
  
2. State whether Bishop has or has had a financial interest of any kind in any business entity. If so, as to each such business entity:
  - a. Identify the name, address, and telephone number of the business entity;
  - b. Describe the nature and extent of such financial interest;
  - c. Specify the date such financial interest was acquired and explain fully how such financial interest was acquired;
  - d. If Bishop no longer holds such financial interest, so state and specify how and when Bishop disposed of such financial interest.
  
3. State whether Bishop has ever held a controlling interest in any business entity. If so, as to each such entity:
  - a. Identify the name, address, and telephone number of the business entity;
  - b. Describe the nature and extent of such controlling interest;
  - c. Specify the date such controlling interest was acquired and explain fully how such controlling interest was acquired;

- d. If Bishop no longer holds such controlling interest, so state and specify how and when Bishop disposed of such controlling interest.
4. State whether Bishop has filed a federal income tax return for each year between January 1, 1998, and the present. If not, explain fully why not.
  5. Describe each and every professional and/or trade license held by Bishop. If Bishop held a license but no longer holds such license, so state and specify how and when Bishop relinquished such license.
  6. State whether any of the authorizations licensed to Preferred Communication Systems, Inc. ("PCSI") are, in fact, held or controlled in part or in full by Bishop. If so, state the type of ownership interest and control, and, for each ownership interest, state the percentage of such ownership.
  7. State whether any of the authorizations licensed to Preferred Acquisitions, Inc. ("PAI"), are, in fact, held or controlled in part or in full by Bishop. If so, state the type of ownership interest and control, and, for each ownership interest, state the percentage of such ownership.
  8. State whether Bishop is or at any time has been the real party-in-interest behind any of PCSI's licenses or authorizations.
  9. State whether Bishop is or at any time has been the real party-in-interest behind any of PAI's licenses or authorizations.
  10. State whether Bishop or any other individual has entered into a management contract (whether written or otherwise) for control of the day-to-day operations of PCSI. If so, provide the dates, terms, and description of the services/responsibilities of the manager under such contract.

11. State whether Bishop or any other individual has entered into a management contract (whether written or otherwise) for control of the day-to-day operations of PAI. If so, provide the dates, terms, and description of the services/responsibilities of the manager under such contract.
12. Identify all individuals that have been members of PCSI's Board of Directors from January 1, 1998 to the present. If these individuals are no longer engaged on the Board, explain fully why not.
13. Identify all individuals that have been members of PAI's Board of Directors from January 1, 1998 to the present. If these individuals are no longer engaged on the Board, explain fully why not.
14. State whether Bishop has ever held an interest of any kind and to any extent whatsoever in PCSI, its applications, and or its licenses. If so, describe fully.
15. State whether Bishop has ever held an interest of any kind and to any extent whatsoever in PAI, its applications, and or its licenses. If so, describe fully.
16. State whether Bishop has ever directly or indirectly held any shares of PCSI stock. If so, specify the number and class of shares that Bishop has held, the dates of such acquisition, the terms of such acquisition, and the percentage of overall outstanding and issued stock shares those shares represented for every year that Bishop held such stock.
17. State whether Bishop has ever directly or indirectly held any shares of PAI stock. If so, specify the number and class of shares that Bishop has held, the dates of such acquisition, the terms of such acquisition, and the percentage of overall

outstanding and issued stock shares those shares represented for every year that Bishop held such stock.

18. Identify all contracts, agreements, or understandings, whether oral or written, whether currently in existence or otherwise, of any kind whatsoever, between Bishop and PCSI.
19. Identify all contracts, agreements, or understandings, whether oral or written, whether currently in existence or otherwise, of any kind whatsoever, between Bishop and PAI.
20. State whether Bishop has ever entered into any agreements to acquire shares of PCSI stock directly or indirectly. If so, specify the number and class of any shares he agreed to acquire and identify the parties to, dates of, and terms of each such agreement.
21. State whether Bishop has ever entered any agreements to acquire shares of PAI stock directly or indirectly. If so, specify the number and class of any shares he agreed to acquire and identify the parties to, dates of, and terms of each such agreement.
22. State whether any of the authorizations licensed to PCSI are controlled in part or in full by Bishop. If so, state the type of control or ownership interest. For each ownership interest, state the percentage of such ownership.
23. State whether any of the authorizations licensed to PAI are controlled in part or in full by Bishop. If so, state the type of control or ownership interest. For each ownership interest, state the percentage of such ownership.

24. State whether Charles M. Austin, PCSI, or PAI has ever employed Bishop. If so, state the dates and terms of such employment, the nature of the services provided by him, (whether there has ever existed an employment contract, agreement or understanding (whether written or otherwise), and compensation paid for such services.
25. State whether Bishop has or has had unfettered use of all of PCSI's facilities, licenses and/or equipment. If not, explain fully the extent of Bishop's use of and access to PCSI's facilities, licenses and/or equipment. Provide the specific locations of all facilities and equipment used by PCSI.
26. State whether Bishop has or has had unfettered use of all of PAI's licenses and/or equipment. If not, explain fully the extent of Bishop's use of and access to PCSI's facilities, licenses and/or equipment. Provide the specific locations of all facilities and equipment used by PAI.
27. Identify all individual(s) who have had responsibility for control of PCSI's daily operations from the date of its inception and, as to each such person, describe the nature of his or her responsibilities.
28. Identify all individual(s) who have had responsibility for control of PAI's daily operations from the date of its inception and, as to each such person, describe the nature of his or her responsibilities.
29. Describe in detail Bishop's responsibilities for the day-to-day operations of PCSI, including but not limited to (1) supervision of employees; (2) control of directors; (3) FCC filings; (4) debt or operations financing; and (5) revenue

generation and allocation. If the nature of such involvement has changed in any way during the relevant period, describe fully how such involvement changed.

30. Describe in detail Bishop's responsibilities for the day-to-day operations of PAI, including but not limited to (1) supervision of employees; (2) control of directors; (3) FCC filings; (4) debt or operations financing; and (5) revenue generation and allocation. If the nature of such involvement has changed in any way during the relevant period, describe fully how such involvement changed.
31. State whether Bishop has ever been involved in any aspect of drafting, filing, or submitting any applications on behalf of PCSI before the FCC. If so, state the full name, date, and if applicable, FCC File Number, of each such application, and describe fully the extent of his involvement as to each application.
32. State whether Bishop has ever been involved in any aspect of drafting, filing, or submitting any applications on behalf of PAI before the FCC. If so, state the full name, date, and if applicable, FCC File Number, of each such application, and describe fully the extent of his involvement as to each application.
33. Identify all individual(s) who have ever been responsible for preparing, filing, or assisting in preparing and filing, Documents on behalf of PCSI with the Commission.
34. Identify all individual(s) who have ever been responsible for preparing, filing, or assisting in preparing and filing, Documents on behalf of PAI with the Commission.

35. Identify all individual(s) who have ever prepared Documents containing the phrase “action items” on behalf of PCSI. Provide a general explanation of the content of each such Document.
36. Identify all individual(s) who have ever prepared Documents containing the phrase “action items” on behalf of PAI. Provide a general explanation of the content of each such Document.
37. Identify all individual(s) who have ever prepared, or assisted in preparing, correspondence or other materials to investors on behalf of PCSI. Provide a general explanation of the content of each such Document.
38. Identify all individual(s) who have ever prepared, or assisted in preparing, correspondence or other materials to investors on behalf of PAI. Provide a general explanation of the content of each such Document.
39. Identify all individual(s) who have ever been responsible for negotiating contracts, investment agreements, and/or legal proceedings on behalf of PCSI, and as to each such person describe fully the negotiations in which he or she was involved, the parties to the negotiations, and the dates of such negotiations.
40. Identify all individual(s) who have ever been responsible for negotiating contracts, investment agreements, and/or legal proceedings on behalf of PAI, and as to each such person describe fully the negotiations in which he or she was involved, the parties to the negotiation, and the dates of such negotiations.
41. Identify all individual(s) responsible for the creation of the annual budget and business plan for PCSI for each year beginning in 1998 to the present.

42. Identify all individual(s) responsible for the creation of the annual budget and business plan for PAI for each year beginning in 1998 to the present.
43. Identify all individual(s) who have been responsible for payment of financing obligations incurred on behalf of PCSI, including expenses arising out of daily operations, since the date of PCSI's inception.
44. Identify all individual(s) who have been responsible for payment of financing obligations incurred on behalf of PAI, including expenses arising out of daily operations, since the date of PAI's inception.
45. Identify all individual(s) or business entities that have ever received consideration of any kind, compensation or revenue arising from the operation of PCSI's facilities or business. Describe fully the nature and extent of such consideration, what share, percentage, and/or amount of such compensation or revenue that each individual or entity received and any agreements establishing the right to such receipt. As to each individual, state the time period(s) during which each such receipt of compensation or revenue continued.
46. Identify all individual(s) who have ever received consideration of any kind, compensation or revenue from the operation of PAI's facilities or business. Describe fully the nature and extent of such consideration, what share, percentage, and/or amount of such compensation or revenue that each individual or entity received and any agreements establishing the right to such receipt. As to each individual, state the time period(s) during which each such receipt of compensation or revenue continued.