

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Parts 1, 22, 24, 27, 74, 80, 90, 95,)	
And 101 To Establish Uniform License Renewal,)	WT Docket No. 10-112
Discontinuance of Operation, and Geographic)	
Partitioning and Spectrum Disaggregation Rules)	
And Policies for Certain Wireless Radio Services)	
)	
Imposition of a Freeze on the Filing of Competing)	
Renewal Applications for Certain Wireless Radio)	
Services and the Processing of Already-Filed)	
Competing Renewal Applications)	
)	
To: The Commission)	

REPLY COMMENTS

Stephen M. Roberts
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August 23, 2010

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
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Amendment of Parts 1, 22, 24, 27, 74, 80, 90, 95, And 101 To Establish Uniform License Renewal, Discontinuance of Operation, and Geographic Partitioning and Spectrum Disaggregation Rules And Policies for Certain Wireless Radio Services)	WT Docket No. 10-112
)	
Imposition of a Freeze on the Filing of Competing Renewal Applications for Certain Wireless Radio Services and the Processing of Already-Filed Competing Renewal Applications)	
)	
To: The Commission)	

REPLY COMMENTS

Snapline Communications, LLC ("Petitioner") has filed applications which are mutually exclusive to thirty WCS renewal applications filed by NW Spectrum Co., and WCS Wireless License Subsidiary, LLC (collectively "Nextwave").

The procedures adopted by the Commission as outlined in the above referenced Notice of Proposed Rulemaking and Order (the "Proposal") will unlawfully deprive Petitioner of its right to a comparative hearing with the incumbents.

Petitioner files these Reply Comments (i) in support of the position of Green Flag Wireless, LLC ("Green Flag") as stated in Green Flag's Petition for Reconsideration dated August 6, 2010 ("Green Flag Petition"); and (ii) includes by reference the arguments as set forth in the Green Flag Petition. The positions as enunciated in the Green Flag Petition are also applicable in Petitioner's matter involving Nextwave.

First, the grant of the renewal applications as proposed would violate the principles of *Ashbacker Radio Corporation v. FCC*, 326 U.S. 327 (1945) because the Proposal does not provide for a hearing on the mutually exclusive applications.

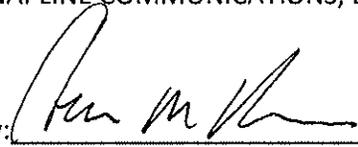
Second, the Commission's action dismissing both Green Flag's and the Petitioner's applications without a hearing would, in addition to violating *Ashbacker*, be contrary to other established law as more fully described in the Green Flag Petition.

From a public policy standpoint, not allowing competitive hearings in this instance creates a situation where existing licensees are rewarded for doing nothing with their spectrum, rather than being penalized for not timely using it to provide service.

For the reasons set forth above, Petitioner urges the Commission not to adopt the rules contemplated in its Proposal.

Respectfully Submitted,

SNAPLINE COMMUNICATIONS, LLC

By:  _____

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August 23, 2010