

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

FILED/ACCEPTED
AUG - 1 2011
Federal Communications Commission
Office of the Secretary

In re)	
)	
MARITIME COMMUNICATIONS/LAND)	EB Docket No. 11-71
MOBILE, LLC)	File No. EB-09-IH-1751
)	FRN: 0013587779
Participant in Auction No. 61 and Licensee of)	
Various Authorizations in the Wireless Radio)	
Services)	
)	
Applicant for Modification of Various)	Application File Nos. 0004030479,
Authorizations in the Wireless Radio Services)	0004144435, 0004193028, 0004193328,
)	0004354053, 0004309872, 0004310060,
Applicant with ENCANA OIL AND GAS (USA),)	0004314903, 0004315013, 0004430505,
INC.; DUQUESNE LIGHT COMPANY; DCP)	0004417199, 0004419431, 0004422320,
MIDSTREAM, LP; JACKSON COUNTY)	0004422329, 0004507921, 0004153701,
RURAL MEMBERSHIP ELECTRIC)	0004526264, 0004636537,
COOPERATIVE; PUGET SOUND ENERGY,)	and 0004604962
INC.; ENBRIDGE ENERGY COMPANY,)	
INC.; INTERSTATE POWER AND LIGHT)	
COMPANY; WISCONSIN POWER AND)	
LIGHT COMPANY; DIXIE ELECTRIC)	
MEMBERSHIP CORPORATION, INC.;)	
ATLAS PIPELINE – MID CONTINENT, LLC;)	
DENTON COUNTY ELECTRIC)	
COOPERATIVE, INC. DBA COSERV)	
ELECTRIC; AND SOUTHERN CALIFORNIA)	
REGIONAL RAIL AUTHORITY)	

To: Maritime Communications/Land Mobile, LLC

**ENFORCEMENT BUREAU'S SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS TO MARITIME COMMUNICATIONS/LAND MOBILE, LLC**

1. The Enforcement Bureau ("Bureau"), pursuant to Section 1.325 of the Commission's rules, 47 C.F.R. § 1.325, hereby requests that Maritime Communications/Land Mobile, LLC produce the Documents, as defined and specified herein, and deliver the Documents to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12th

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Street, S.W., Washington, DC 20554 (or at some other location that is mutually acceptable to the Bureau and Maritime Communications/Land Mobile, LLC) within ten (10) days of the date of this Document Request.

Definitions

a. As used herein, the term “you” or “your” or “Maritime” or “Maritime Communications/Land Mobile, LLC ” means “Maritime Communications/Land Mobile, LLC, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period January 1, 2002 through the present. For purposes of this definition, “affiliate” shall include, but not be limited to, Donald R. DePriest.

b. “Applicant Parties” or “Applicant Party” shall mean Atlas Pipeline Mid-Continent, LLC; DCP Midstream, LP; Denton County Electric Cooperative, Inc. d/b/a CoServ Electric; Dixie Electric Membership Corporation, Inc.; Enbridge Energy Company, Inc.; Encana Oil & Gas (USA) Inc.; Interstate Power and Light Company; Jackson County Rural Electric Membership Corporation; Wisconsin Power and Light Company; Duquesne Light Company; Puget Sound Energy, Inc.; and Southern California Regional Rail Authority, including all other persons acting or purporting to act on their behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company

or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period January 1, 2002 through the present.

c. "Act" shall mean the Communications Act of 1934, as amended.

d. "Commission" or "FCC" shall mean the Federal Communications Commission.

e. The terms/phrases "referring to," "relating to" and/or "concerning," as used herein, shall be interpreted broadly and shall include, but not be limited to, the following meanings:

constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, concerning, regarding, indicating, pertaining to, showing, bearing upon, studying, memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.

f. "State" and "describe" mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise or bear upon the matter concerning which information is requested.

g. The terms "identify" and "identification" when used in reference to an individual person mean to state his full name, residence and business telephone numbers, and present residence and business addresses if known, and his present or last known title, position and business affiliation.

h. The terms "identify" and "identification" when used in reference to a person other than a natural person mean to state the full and official name of the business entity, its principal place of business, and the main telephone number of such business entity.

i. The terms "identify" and "identification" when used in reference to a document mean to state its date, type (e.g., memo, telecopy, email), and its authors, addressees, title, if any, and, if no title, a brief description of the subject matter of the document and its present or last known

location and custodian. If any document once was, but is no longer, in your possession, custody, or control, state what disposition was made of it and the reason for such disposition.

j. The terms “identify” and “identification” when used in reference to any act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication, mean to: (a) describe the nature and substance of the act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication; (b) state the date when and place where it occurred; and (c) identify each person who was a participant therein.

k. The term “and” also means “or” and the term “or” also means “and.”

l. The term “each” also means “every” and the term “every” also means “each.”

m. The term “all” also means “any” and the term “any” also means “all.”

n. 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.

o. 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 Maritime.

p. "Discussion" means any assembly, congregation, encounter, meeting or conversation between or among two or more individuals for any purpose, whether or not planned, arranged, or scheduled in advance. "Discussion" includes, without limitation, all oral communications, whether or not in person, by telephone (including voicemails and similar recordings), or otherwise, and electronic communications (including emails) between two or more individuals.

q. "Communication" means any discussion or any written or electronic correspondence or recorded voice message of any kind.

r. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

s. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

t. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

u. "Person" means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

v. “Mobex” shall mean Mobex Network Services, LLC and any predecessor-in-interest, affiliate, parent company, wholly or partially owned subsidiary, other affiliated company or business, and all owners, including but not limited to, partners or principals, and all members, directors, officers, employees, managers or agents, including consultants and any other persons working for or on behalf of the foregoing at any time during the period January 1, 2002 through the present.

w. “Short-Form Application” shall mean the FCC Form 175 that Maritime filed with the Commission to participate in Auction No. 61.

x. “Long-Form Application” shall mean the FCC Form 601 that Maritime filed with the Commission in connection with its participation in Auction No. 61.

y. “FCC Form 602” shall mean the FCC Form 602 that Maritime filed with the Commission in connection with its participation in Auction No. 61.

Instructions

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all annual data requested on a calendar-year basis; if any basis other than a calendar-year basis is used, such as to accommodate a fiscal-year basis, state as part of the response the nature and type of the basis so used.

c. Unless otherwise specified, supply all information requested for the period January 1, 2002 through the present.

DOCUMENTS REQUESTED

1. All Documents evidencing or referring to any Communications between Sandra DePriest and John Reardon that occurred during calendar year 2005.
2. All Documents evidencing or referring to any Communications between Sandra DePriest and Mobex.
3. All Documents evidencing any Communications between Sandra DePriest and the National Rural Telecommunications Cooperative that occurred between January 1, 2002 and the present.
4. Documents sufficient to show each contract that Sandra DePriest entered into on behalf of Maritime.
5. To the extent not already produced in response to Request No. 4, documents sufficient to show each document signed by Sandra DePriest on behalf of Maritime.
6. Documents sufficient to show each contract that John Reardon entered into on behalf of Maritime.
7. To the extent not already produced in response to Request No. 6, documents sufficient to show each document signed by John Reardon on behalf of Maritime.
8. Documents sufficient to show each contract that Robert "Tim" Smith entered into on behalf of Maritime.
9. To the extent not already produced in response to Request No. 8, documents sufficient to show each document signed by Robert "Tim" Smith on behalf of Maritime.
10. All documents evidencing Communication(s) of the "Board" referenced in Maritime's response to question number 1 of the Enforcement Bureau's February 26, 2009 letter of inquiry, including but not limited to meeting minutes.

11. Documents sufficient to show the date(s) and duration of each trip taken by Sandra DePriest in her capacity as an Episcopal priest, including but not limited to trips to Honduras, from January 1, 2002 through the present.
12. Documents sufficient to describe the duties and responsibilities of Robert "Tim" Smith, including but not limited to his employment contract with Maritime.
13. All documents referring to or reflecting the advice of counsel that Maritime received concerning the Commission's ownership affiliation rules set forth in 47 C.F.R. § 1.2110.
14. All federal and state income tax returns filed by or on behalf of Sandra DePriest for each of the tax years 2002 - 2006.
15. Documents sufficient to show the annual gross income of S/RJW Partnership, L.P. for each of the tax years 2002, 2003 and 2004, including but not limited to all federal and state income tax returns.

Respectfully,

P. Michele Ellison
Chief, Enforcement Bureau



Pamela S. Kane
Deputy Chief
Investigations and Hearings Division
Enforcement Bureau

Brian J. Carter
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Investigations and Hearings Division
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(202) 418-1420

August 1, 2011

CERTIFICATE OF SERVICE

Makia Day, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 1st day of August, 2011, sent by first class United States mail, copies of the foregoing "Enforcement Bureau's Second Request For Production Of Documents To Maritime Communications/Land Mobile, LLC." to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

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Skybridge Spectrum Foundation**



Makia Day