

Before the  
Federal Communications Commission  
Washington, D.C. 20554

FILED/ACCEPTED

SEP 16 2011

Federal Communications Commission  
Office of the Secretary

In re )

MARITIME COMMUNICATIONS/LAND )  
MOBILE, LLC )

Participant in Auction No. 61 and Licensee of )  
Various Authorizations in the Wireless Radio )  
Services )

Applicant for Modification of Various )  
Authorizations in the Wireless Radio Services )

Applicant with ENCANA OIL AND GAS (USA), )  
INC.; DUQUESNE LIGHT COMPANY; DCP )  
MIDSTREAM, LP; JACKSON COUNTY )  
RURAL MEMBERSHIP ELECTRIC )  
COOPERATIVE; PUGET SOUND ENERGY, )  
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 )

EB Docket No. 11-71  
File No. EB-09-IH-1751  
FRN: 0013587779

Application File Nos. 0004030479,  
0004144435, 0004193028, 0004193328,  
0004354053, 0004309872, 0004310060,  
0004314903, 0004315013, 0004430505,  
0004417199, 0004419431, 0004422320,  
0004422329, 0004507921, 0004153701,  
0004526264, 0004636537,  
and 0004604962

To: Marlene H. Dortch, Secretary  
Attention: Chief Administrative Law Judge Richard L. Sippel

**ENFORCEMENT BUREAU'S SUPPLEMENT TO ITS  
OPPOSITION TO MOTION TO DEFER ALL PROCEDURAL DATES**

1. On August 10, 2011, the Enforcement Bureau ("the Bureau") opposed a motion by Maritime Communications/Land Mobile, LLC ("Maritime") to stay the instant proceeding to allow the company to pursue bankruptcy-related relief under the Commission's *Second Thursday*

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policy.<sup>1</sup> Since that time, the Bureau has received new information relating to Maritime's bankruptcy petition which, in the Bureau's view, further demonstrates why a stay of this proceeding at this time is inappropriate and ill-advised. Accordingly, the Bureau hereby supplements its opposition with the following information.<sup>2</sup>

2. In the ordinary course, if a licensee demonstrated that it likely would be entitled to *Second Thursday* relief, the stay of a hearing proceeding might not be as objectionable. In this case, however, the Bureau pointed to a number of representations in Maritime's stay request that strongly indicate that a stay at this time would be premature. In particular, the Bureau noted that:

- The stay being requested was for an undefined, if not indefinite, amount of time.
- Maritime suggested that it intended to dispose of only some, rather than all, of its FCC licenses, a proposal that would be contrary to the Commission's *Second Thursday* policy.
- A further hearing on Maritime's qualifications might still be required even if Maritime availed itself of *Second Thursday* relief.
- Maritime's request for a stay of all procedural dates appeared conveniently timed to allow Maritime to evade its obligation to respond to the Bureau's various requests for discovery.

3. In its Reply to the Bureau's opposition,<sup>3</sup> by which Maritime presumably intended to address the Bureau's concerns, Maritime did not state that it intended to enter into transactions that would effectuate the disposal of all of its FCC licenses. To the contrary, Maritime suggested that the only licenses or portions of licenses it intends to subject to the *Second Thursday* process

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<sup>1</sup> See Maritime's Motion to Defer All Procedural Dates, filed August 1, 2011 ("Motion") and Enforcement Bureau's Opposition to Motion to Defer All Procedural Dates, filed August 10, 2011.

<sup>2</sup> In a related submission filed concurrently herewith, the Bureau respectfully requests leave to file the instant pleading.

<sup>3</sup> See Maritime's Reply to Oppositions to Motion to Defer Procedural Dates ("Reply"), filed August 16, 2011. Such reply pleadings are not contemplated by the Commission's Rules; however, by Order, FCC 11M-25 (ALJ, rel. Aug. 30, 2011), the Presiding Judge accepted Maritime's Reply.

are those for which there are currently “contracts with the applicant parties.”<sup>4</sup> Maritime further represented that “whether the remaining licenses will be sold as assets or ownership of the company itself will be restructured, will be determined in the context of the bankruptcy case.”<sup>5</sup> Notably, at the time Maritime made this representation concerning the “remaining licenses” in its Reply, neither the Bureau nor the Presiding Judge had the benefit of Maritime’s complete bankruptcy filing. It was not until September 7, 2011, that Maritime finally filed with the bankruptcy court the requisite schedules identifying its total assets and total liabilities.<sup>6</sup> These schedules raise grave concerns about whether *Second Thursday* relief would be the appropriate mechanism for addressing these “remaining licenses” – and thus whether there is any basis at this time to stay this hearing pending resolution of the *Second Thursday* process.

4. Specifically, these schedules reveal that all of Maritime’s assets are valued at more than \$47.6 million, the lion’s share of which – \$45.2 million – represents the value of its FCC licenses.<sup>7</sup> Furthermore, these schedules identify Maritime’s liabilities as a little over \$31.2 million, nearly a quarter of which – some \$6.8 million – is owed to Sandra and Donald DePriest, both of whom are alleged wrong-doers in this case.<sup>8</sup> Thus, at most, Maritime’s liabilities to innocent creditors amount to \$24.4 million.

5. Based on this information, it appears that Maritime need only assign a portion of its \$45.2 million license portfolio – whether by outright sale or some form of restructuring of ownership of Maritime – to satisfy its obligations to the innocent creditors. Said otherwise,

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<sup>4</sup> Reply at 5. The contracts with the applicant parties affect no more than four (4) of the seventy-one (71) licenses pending in the hearing.

<sup>5</sup> Reply at 5.

<sup>6</sup> See Summary of Schedules and Schedules A-H filed by Maritime with the United States Bankruptcy Court for the Northern District of Mississippi on September 7, 2011, attached hereto as Exhibit A.

<sup>7</sup> See Exhibit A at Summary of Schedules and Schedule B.

<sup>8</sup> See Exhibit A at Summary of Schedules and Schedules D, E and F.

Maritime would only need to subject a portion of its licenses to a *Second Thursday* analysis to meet its innocent creditor obligations. With regard to the remaining licenses, there would still be substantial and material questions of fact concerning Maritime's qualifications to be and to remain a licensee. Once the debt to the innocent creditors has been satisfied, nothing in the *Second Thursday* doctrine would allow Maritime to avoid a hearing on these substantial and material questions of fact.<sup>9</sup> Accordingly, a stay of the hearing, pending *Second Thursday* treatment of only a limited number of the licenses designated for hearing, is neither necessary nor warranted. As the hearing would still need to be completed in any event, it should be completed expeditiously.<sup>10</sup>

6. For the foregoing reasons, the Bureau respectfully asks the Presiding Judge to deny Maritime's request for an indefinite deferral of all dates in this proceeding and order that this proceeding move forward. As the Presiding Judge noted in his recent Order, "[i]t is best here to leave well enough alone and proceed with marshalling facts."<sup>11</sup>

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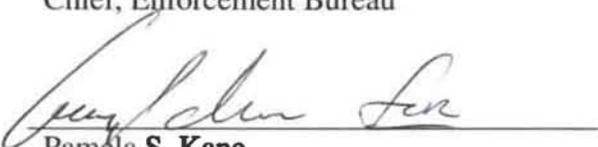
<sup>9</sup> The *Second Thursday* doctrine is designed to balance the public interest in resolving questions as to a licensee's qualifications against the public interest in allowing the innocent creditor to recover monies owed. See, e.g., *Family Broadcasting, Inc.*, 25 FCC Rcd 7591 at \*5 (2010); *Second Thursday Corp.*, 22 FCC2d 515, 518 (1970).

<sup>10</sup> Among the issues to be resolved at hearing is whether Maritime must repay in full the bidding credit it received in Auction 61 and, in addition, whether Maritime should be ordered to pay a forfeiture penalty.

<sup>11</sup> See Order, FCC 11M-25 (ALJ, rel. August 30, 2011).

**Respectfully submitted,**

**P. Michele Ellison**  
Chief, Enforcement Bureau

A handwritten signature in cursive script, appearing to read "Pamela S. Kane", written over a horizontal line.

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

**Brian J. Carter**  
Attorney  
Investigations and Hearings Division  
Enforcement Bureau

**Federal Communications Commission**  
445 12th Street SW  
Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

**September 16, 2011**

**EXHIBIT A**

**United States Bankruptcy Court  
Northern District of Mississippi**

In re Maritime Communications/Land Mobile, LLC  
Debtor

Case No. 11-13463-DWH

Chapter 11

**SUMMARY OF SCHEDULES**

Indicate as to each schedule whether that schedule is attached and state the number of pages in each. Report the totals from Schedules A, B, D, E, F, I, and J in the boxes provided. Add the amounts from Schedules A and B to determine the total amount of the debtor's assets. Add the amounts of all claims from Schedules D, E, and F to determine the total amount of the debtor's liabilities. Individual debtors must also complete the "Statistical Summary of Certain Liabilities and Related Data" if they file a case under chapter 7, 11, or 13.

NAME OF SCHEDULE	ATTACHED (YES/NO)	NO. OF SHEETS	ASSETS	LIABILITIES	OTHER
A - Real Property	Yes	1	12,500.00		
B - Personal Property	Yes	30	47,637,173.05		
C - Property Claimed as Exempt	No	0			
D - Creditors Holding Secured Claims	Yes	3		18,790,111.05	
E - Creditors Holding Unsecured Priority Claims (Total of Claims on Schedule E)	Yes	10		264,642.09	
F - Creditors Holding Unsecured Nonpriority Claims	Yes	21		12,197,999.36	
G - Executory Contracts and Unexpired Leases	Yes	15			
H - Codebtors	Yes	2			
I - Current Income of Individual Debtor(s)	No	0			N/A
J - Current Expenditures of Individual Debtor(s)	No	0			N/A
<b>Total Number of Sheets of ALL Schedules</b>		<b>82</b>			
		<b>Total Assets</b>	<b>47,649,673.05</b>		
			<b>Total Liabilities</b>	<b>31,252,752.50</b>	

**United States Bankruptcy Court  
Northern District of Mississippi**

In re Maritime Communications/Land Mobile, LLC  
Debtor

Case No. 11-13463-DWH

Chapter 11

**STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA (28 U.S.C. § 159)**

If you are an individual debtor whose debts are primarily consumer debts, as defined in § 101(8) of the Bankruptcy Code (11 U.S.C. § 101(8)), filing a case under chapter 7, 11 or 13, you must report all information requested below.

Check this box if you are an individual debtor whose debts are NOT primarily consumer debts. You are not required to report any information here.

**This information is for statistical purposes only under 28 U.S.C. § 159.**

**Summarize the following types of liabilities, as reported in the Schedules, and total them.**

Type of Liability	Amount
Domestic Support Obligations (from Schedule E)	
Taxes and Certain Other Debts Owed to Governmental Units (from Schedule E)	
Claims for Death or Personal Injury While Debtor Was Intoxicated (from Schedule E) (whether disputed or undisputed)	
Student Loan Obligations (from Schedule F)	
Domestic Support, Separation Agreement, and Divorce Decree Obligations Not Reported on Schedule E	
Obligations to Pension or Profit-Sharing, and Other Similar Obligations (from Schedule F)	
<b>TOTAL</b>	

State the following:

Average Income (from Schedule I, Line 16)	
Average Expenses (from Schedule J, Line 18)	
Current Monthly Income (from Form 22A Line 12; OR, Form 22B Line 11; OR, Form 22C Line 20)	

State the following:

1. Total from Schedule D, "UNSECURED PORTION, IF ANY" column		
2. Total from Schedule E, "AMOUNT ENTITLED TO PRIORITY" column		
3. Total from Schedule E, "AMOUNT NOT ENTITLED TO PRIORITY, IF ANY" column		
4. Total from Schedule F		
5. Total of non-priority unsecured debt (sum of 1, 3, and 4)		

In re Maritime Communications/Land Mobile, LLC

Case No. 11-13463-DWH

Debtor

**SCHEDULE A - REAL PROPERTY**

Except as directed below, list all real property in which the debtor has any legal, equitable, or future interest, including all property owned as a cotenant, community property, or in which the debtor has a life estate. Include any property in which the debtor holds rights and powers exercisable for the debtor's own benefit. If the debtor is married, state whether husband, wife, both, or the marital community own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor holds no interest in real property, write "None" under "Description and Location of Property."

**Do not include interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.**

If an entity claims to have a lien or hold a secured interest in any property, state the amount of the secured claim. See Schedule D. If no entity claims to hold a secured interest in the property, write "None" in the column labeled "Amount of Secured Claim." If the debtor is an individual or if a joint petition is filed, state the amount of any exemption claimed in the property only in Schedule C - Property Claimed as Exempt.

Description and Location of Property	Nature of Debtor's Interest in Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption	Amount of Secured Claim
5.46 ac. located at 15050 Shivler Road, Larshaville, Beaver Co., PA; site of tower	Fee simple	-	5,000.00	0.00
5.1390 ac. located at Road 19, New Matamoros, Monroe Co., OH; site of tower	Fee simple	-	7,500.00	0.00

Sub-Total > 12,500.00 (Total of this page)

Total > 12,500.00

(Report also on Summary of Schedules)

0 continuation sheets attached to the Schedule of Real Property

B6B (Official Form 6B) (12/07)

In re Maritime Communications/Land Mobile, LLC

Case No. 11-13463-DWH

Debtor

**SCHEDULE B - PERSONAL PROPERTY**

Except as directed below, list all personal property of the debtor of whatever kind. If the debtor has no property in one or more of the categories, place an "x" in the appropriate position in the column labeled "None." If additional space is needed in any category, attach a separate sheet properly identified with the case name, case number, and the number of the category. If the debtor is married, state whether husband, wife, both, or the marital community own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor is an individual or a joint petition is filed, state the amount of any exemptions claimed only in Schedule C - Property Claimed as Exempt.

Do not list interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.

If the property is being held for the debtor by someone else, state that person's name and address under "Description and Location of Property." If the property is being held for a minor child, simply state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

Type of Property	N O N E	Description and Location of Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption
1. Cash on hand	X			
2. Checking, savings or other financial accounts, certificates of deposit, or shares in banks, savings and loan, thrift, building and loan, and homestead associations, or credit unions, brokerage houses, or cooperatives.		Operating Account No. 0733 at Stock Yards Bank & Trust	-	1,331.43
3. Security deposits with public utilities, telephone companies, landlords, and others.		Deposits with Landlords - VA Office (\$875.00) and IN Office (\$1,687.50)	-	2,562.50
4. Household goods and furnishings, including audio, video, and computer equipment.	X			
5. Books, pictures and other art objects, antiques, stamp, coin, record, tape, compact disc, and other collections or collectibles.	X			
6. Wearing apparel.	X			
7. Furs and jewelry.	X			
8. Firearms and sports, photographic, and other hobby equipment.	X			
9. Interests in insurance policies. Name insurance company of each policy and itemize surrender or refund value of each.	X			
10. Annuities. Itemize and name each issuer.	X			
Sub-Total >				3,893.93
(Total of this page)				

3 continuation sheets attached to the Schedule of Personal Property

In re Maritime Communications/Land Moblle, LLC

Case No. 11-13463-DWH

Debtor

**SCHEDULE B - PERSONAL PROPERTY**  
(Continuation Sheet)

Type of Property	NON E	Description and Location of Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption
11. Interests in an education IRA as defined in 26 U.S.C. § 530(b)(1) or under a qualified State tuition plan as defined in 26 U.S.C. § 529(b)(1). Give particulars. (File separately the record(s) of any such interest(s). 11 U.S.C. § 521(c).)	X			
12. Interests in IRA, ERISA, Keogh, or other pension or profit sharing plans. Give particulars.		Maritime Communications/Land Moblle, LLC 401(k) Profit-Sharing Plan & Trust	-	0.00
13. Stock and interests in incorporated and unincorporated businesses. Itemize.		90% Interest in Critical RF, Inc., purchased in 2006	-	50,000.00
14. Interests in partnerships or joint ventures. Itemize.	X			
15. Government and corporate bonds and other negotiable and nonnegotiable instruments.	X			
16. Accounts receivable.		Accounts Receivable	-	1,028,879.12
<b>NOTE: STATED VALUE CONSISTS PRIMARILY OF JUDGMENT AGAINST CENTRAL COMMUNICATIONS NETWORK OF \$978,020.41</b>				
17. Alimony, maintenance, support, and property settlements to which the debtor is or may be entitled. Give particulars.	X			
18. Other liquidated debts owed to debtor including tax refunds. Give particulars.	X			
19. Equitable or future interests, life estates, and rights or powers exercisable for the benefit of the debtor other than those listed in Schedule A - Real Property.	X			
20. Contingent and noncontingent interests in estate of a decedent, death benefit plan, life insurance policy, or trust.	X			

Sub-Total > 1,078,879.12  
(Total of this page)

Sheet 1 of 3 continuation sheets attached to the Schedule of Personal Property

B6B (Official Form 6B) (12/07) - Cont.

In re Maritime Communications/Land Mobile, LLC

Case No. 11-13463-DWH

Debtor

**SCHEDULE B - PERSONAL PROPERTY**  
(Continuation Sheet)

Type of Property	N O N E	Description and Location of Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption
21. Other contingent and unliquidated claims of every nature, including tax refunds, counterclaims of the debtor, and rights to setoff claims. Give estimated value of each.	X			
22. Patents, copyrights, and other intellectual property. Give particulars.	X			
23. Licenses, franchises, and other general intangibles. Give particulars.		See Attachment 1	-	45,200,000.00
NOTE: VALUE SHOWN IS PER JUNE, 2008, APPRAISAL				
24. Customer lists or other compilations containing personally identifiable information (as defined in 11 U.S.C. § 101(41A)) provided to the debtor by individuals in connection with obtaining a product or service from the debtor primarily for personal, family, or household purposes.	X			
25. Automobiles, trucks, trailers, and other vehicles and accessories.	X			
26. Boats, motors, and accessories.	X			
27. Aircraft and accessories.	X			
28. Office equipment, furnishings, and supplies.		11 Computers; 3 Printers, 8 Desks, 5 Credenzas, 2 Conference Tables, 8 File Cabinets, 5 Bookcases	-	4,400.00
29. Machinery, fixtures, equipment, and supplies used in business.		See Attachment 2	-	1,350,000.00
30. Inventory.	X			
31. Animals.	X			
32. Crops - growing or harvested. Give particulars.	X			
33. Farming equipment and implements.	X			
34. Farm supplies, chemicals, and feed.	X			

Sub-Total > **46,554,400.00**  
(Total of this page)

Sheet 2 of 3 continuation sheets attached to the Schedule of Personal Property

In re Maritime Communications/Land Mobile, LLC

Case No. 11-13463-DWH

Debtor

**SCHEDULE B - PERSONAL PROPERTY**  
(Continuation Sheet)

Type of Property	N O N E	Description and Location of Property	Husband, Wife, Joint, or Community	Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption
35. Other personal property of any kind not already listed. Itemize.	X			

Sub-Total > 0.00  
(Total of this page)  
Total > 47,637,173.05

(Report also on Summary of Schedules)

Sheet 3 of 3 continuation sheets attached to the Schedule of Personal Property

Maritime Communications/Land Mobile, LLC  
Chapter 11; Case No. 11-13463-DWH  
Attachment I to Schedule B  
23. Licenses, Franchises & Other General Intangibles

### Schedule B23 List of Call Signs

Call Sign	Loc	Site Name/Address	City	County	State
KAE889	3	LIVINGSTON PEAK	CAMAS	CLARK	WA
	4	RAINIER HILL 2 MI SE OF TIMONEY RD	RAINIER	THURSTON	WA
	6	7505 SKYLINE RD SOUTH	SALEM	MARION	OR
	8	MT ADELAIDE	BAKERSFIELD	KERN	CA
	12	MOUNT BALDY 4.8 KM NE	PHOENIX	JACKSON	OR
	13	END OF SW COUNCIL RD	PORTLAND	MULTNOMAH	OR
	14	SANTIAGO PEAK	CORONA	ORANGE	CA
	20	MOUNT CONSTITUTION	ORCAS ISLAND	SAN JUAN	WA
	22	BUCK MOUNTAIN	EUGENE	LANE	OR
	26	MOUNT TORO	SALINAS	MONTEREY	CA
	27	MOUNT TAMALPAIS	SAN RAFAEL	MARIN	CA
	28	MOUNT DIABLO	WALNUT CREEK	CONTRA COSTA	CA
	30	GOLD MOUNTAIN	BREMERTON	JEFFERSON	WA
	33	LOMA PRIETA	LOS GATOS	SANTA CLARA	CA
	34	CAPITAL PEAK	OLYMPIA	THURSTON	WA
	37	MT OSO	MODESTO	STANISLAUS	CA
	39	JOAQUIN RIDGE	COALINGA	FRESNO	CA
	40	MT STEPHENSON	PINE VALLEY	SAN DIEGO	CA
44	HAUSER MOUNTAIN	PALMDALE	LOS ANGELES	CA	
46	GOAT MOUNTAIN	WOODBURN	MARION	OR	
48	TIGER MOUNTAIN	SEATTLE	KING	WA	
KCE278	1	6.7 MI SE I-75 & US 31	CHARLEVOIX	CHARLEVOIX	MI
	2	5667 W M68 HWY	ROGERS CITY	PRESQUE ISLE	MI
KPB531	1	13465 ALGER RD	MUSKEGON	MUSKEGON	MI
	2	4266 N COUNTY RD 525 W	MICHIGAN CITY	LA PORTE	IN
	3	2700 SHERIDAN RD	KENOSHA	KENOSHA	WI
	4	WMTV TV TRANSMITTER SITE	MILWAUKEE	MILWAUKEE	WI
	5	INTERSECTION OF GILMER AND MIDLOTHIAN RDS	LAKE ZURICH	LAKE	IL

### Schedule B23 List of Call Signs

<b>KUF732</b>	1	PINNACLE HWY OFF HIGHLAND AVE	ROCHESTER	MONROE	NY
	2	SEVIER ROAD	SYRACUSE	ONONDAGA	NY
	3	1701 STADIUM RD	TOLEDO	OTTAWA	OH
	4	KJOI FM TRANSMITTER SITE	DETROIT	WAYNE	MI
	5	BETWEEN RANSOM & WHITEHAVEN AVE 0.75 MI NW OF E RIVER RD	BUFFALO	ERIE	NY
	6	ON US 19 SE OF INTERSECTION US 19 & 90	ERIE	ERIE	PA
	7	4800 BREUNING DR	CLEVELAND	CUYAHOGA	OH
<b>WHG693</b>	1	STATION 56 NEAR HWY 23	VENICE	PLAQUEMINES	LA
<b>WHG701</b>	1	STATION 2 CHAT HOLLEY RD 1.5 MI WSW	SANTA ROSA BEACH	WALTON	FL
<b>WHG702</b>	1	STATION 3 LANCASTER RD 3 MI S	THEODORE	MOBILE	AL
<b>WHG703</b>	1	STATION 4 HIDDEN VALLEY RD 5 MI NNE	DELISLE	HARRISON	MS
<b>WHG705</b>	1	STATION 6 HWY 662 NE	AMELIA	ASSUMPTION	LA
<b>WHG706</b>	1	STATION 7 PARISH RD 7-1	INTRACOASTAL CITY	VERMILION	LA
<b>WHG707</b>	1	STATION 8 HWY 73	PORT ARTHUR	JEFFERSON	TX
<b>WHG708</b>	1	STATION 9 WESTCREST DR	DICKINSON	GALVESTON	TX
<b>WHG709</b>	1	STATION 10 FM RD 2611	BAY CITY	MATAGORDA	TX
<b>WHG710</b>	1	STATION 11 RABBIT RUN RD	ARANSAS PASS	SAN PATRICIO	TX
<b>WHG711</b>	1	STATION 12 RIVIERA TELEPHONE COMMUNICATIONS SITE	RIVIERA	KLEBERG	TX

### Schedule B23 List of Call Signs

WHG712	1	STATION 13 WITHIN CITY LIMITS	JEFFERSON HEIGHTS	JEFFERSON	LA
WHG713	1	STATION 14 3.32 MI W	CARVILLE	IBERVILLE	LA
WHG714	1	STATION 15 8 MI NE	REDWOOD	WARREN	MS
WHG715	1	STATION 16 2.75 MI N	WAYSIDE	WASHINGTON	MS
WHG716	1	STATION 17 1.33 MI SE	LAKE CORMORANT	DESOTO	MS
WHG717	1	STATION 18 9.1 MI NE	SAMBURG	OBION	TN
WHG718	1	STATION 19 2 MI SW	ALTO PASS	UNION	IL
WHG719	1	STATION 20 .28 MI N	MADONNAVILLE	MONROE	IL
WHG720	1	STATION 21 1.5 MI N	GRAFTON	JERSEY	IL
WHG721	1	STATION 22 3.4 MI SW	SAVERTON	RALLS	MO
WHG722	1	STATION 23 3 MI NNE	ADRIAN	HANCOCK	IL
WHG723	1	STATION 24 .5 MI E	REYNOLDS	ROCK ISLAND	IL
WHG724	1	STATION 25 1.4 MI SW	MILES	JACKSON	IA
WHG725	1	STATION 26 .9 MI NE	SHERRILL	DUBUQUE	IA
WHG726	1	STATION 27 1.72 MI E	MIDWAY	MASSAC	IL

### Schedule B23 List of Call Signs

WHG727	1	STATION 28 KY 416 AT JCT WITH KY 1078	HEBBARDSVILLE	HENDERSON	KY
WHG728	1	STATION 29 IN SR 11 ROUTE 1	ELIZABETH	FLOYD	IN
WHG729	1	STATION 30 COLBERT LN 1.25 MI NW	BEDFORD	TRIMBLE	KY
WHG730	1	STATION 31 KENTUCKY HWY 1303 SHAW RD 1.25 MI SW	INDEPENDENCE	KENTON	KY
WHG731	1	STATION 32 2.7 MI S	FAIRVIEW	ADAMS	OH
WHG732	1	STATION 33 3.8 MI SW	LETITIA	GREENUP	KY
WHG733	1	STATION 34 .9 MI SE	GREASY RIDGE	LAWRENCE	OH
WHG734	1	STATION 35 COUNTY RD 2150 W	MEREDOSIA	MORGAN	IL
WHG735	1	STATION 36 BEHREND'S RD	HANNA CITY	PEORIA	IL
WHG736	1	STATION 37 N 17TH RD	TONICA	LA SALLE	IL
WHG737	1	STATION 38 GOUGER RD 0.1 MI S OF 151ST ST	LOCKPORT	WILL	IL
WHG738	1	STATION 39 1.2 MI S	FORDS FERRY	CRITTENDEN	KY
WHG739	1	STATION 40 .8 MI W	MOOLEYVILLE	BRECKINRIDGE	KY
WHG740	1	STATION 41 2 MI NE	BASHAN	MEIGS	OH

### Schedule B23 List of Call Signs

WHG741	1	STATION 42 .57 MI N	BROWNSVILLE	MONROE	OH
WHG742	1	STATION 3 1.8 MI SSE	LANSING	ALLAMAKEE	IA
WHG743	1	STATION 44 .68 MI NE	WITOKA	WINONA	MN
WHG744	1	STATION 45 3.22 MI NNE	DIAMOND BLUFF	PIERCE	WI
WHG745	1	STATION 46 .5 MI S	LAUREL HILL	WEST FELICIANA	LA
WHG746	1	STATION 47 3.3 MI N	PINE RIDGE	ADAMS	MS
WHG747	1	STATION 48 .3 MI NE	RENA LARA	COAHOMA	MS
WHG748	1	STATION 49 1.5 MI NE	FULTON	LAUDERDALE	TN
WHG749	1	STATION 50 3.22 MI W	SHADYSIDE	BELMONT	OH
WHG750	1	STATION 51 3.22 MI E	HOOKSTOWN	BEAVER	PA
WHG751	1	STATION 52 HWY 191A .7 MI N	AVALON BEACH	SANTA ROSA	FL
WHG752	1	STATION 53 RR 2 BESSIE RD	LAKE CHARLES	CALCASIEU	LA
WHG753	1	54 HWY 316	PORT LAVACA	CALHOUN	TX
WHG754	1	STATION 55 ROUTE 1	RAYMONDSVILLE	WILLACY	TX
WHV733	1	SAURATOWN MOUNTAIN RD	STOKES COUNTY	STOKES	NC

### Schedule B23 List of Call Signs

WHV843	1	ON US 276	CEASARS HEAD	GREENVILLE	SC
	5	CROWDERS NTN 5.5 MI SW	GASTONIA	GASTON	NC
	6	.7 MI SE JCT SC 202 & US76	LITTLE MOUNTAIN	NEWBERRY	SC
WHW848	1	1700 E MARKET ST	JEFFERSONVILLE	CLARK	IN
WRD580	1	MOFFET CEMETERY RD	MILTON	TRIMBLE	KY
	2	BULL RUN MOUNTAIN	MANASSAS	MANASSAS	VA
WRV374	3	ANTENNA FARM	PHILADELPHIA	PHILADELPHIA	PA
	8	1785 HILL AVE	MANGONIA PARK	PALM BEACH	FL
	12	CITRUS CENTER	ORLANDO	ORANGE	FL
	14	ADIRONDAK DR 6 MI N OF GRANNY & MIDVALE RDS	SELDEN	SUFFOLK	NY
	15	CLARIDGE HOUSE ON CLARIDGE RD	VERONA	ESSEX	NJ
	16	SAVERCOOL AVE	ALLENTOWN	LEHIGH	PA
	17	1/2 MI E DELAWARE 52	WINTERTHUR	NEW CASTLE	DE
	18	RT 100C WESTCHESTER COMMUNITY COLLEGE	VALHALLA	WESTCHESTER	NY
	18	RT 100C WESTCHESTER COMMUNITY COLLEGE	VALHALLA	WESTCHESTER	NY
	19	NEAR	MIAMI	MIAMI-DADE	FL
	20	BROWN HILL 1.9 MI NNW	RAYMOND	CUMBERLAND	ME
	22	ON JAY RD 1 MI S OF CISCO RD	SPAULDING	DUVAL	FL
	23	61 BRASSWELL ST	CHARLESTON	CHARLESTON	SC
	24	MYRTLE BEACH	CONWAY	HORRY	SC
	25	SWEETMAN LANE	PERRINVILLE	MONMOUTH	NJ
	26	835 E PERRY LANE	SAVANNAH	CHATHAM	GA
	27	1404 MYRTLE AVE	NAVASSA	BRUNSWICK	NC
28	INTERSECTION RTS 625 & 337	SUFFOLK	SUFFOLK	VA	
29	3245 BASIE RD	RICHMOND	RICHMOND	VA	
31	388 HOOPER AVE	BALTIMORE		MD	

### Schedule B23 List of Call Signs

	33	ONE WORLD TRADE CENTER	NEW YORK	NEW YORK	NY
	34	NEAR	FAJARDO	FAJARDO	PR
	35	89 PINE ST	REHOBETH	BRISTOL	MA
	36	HWY 70 E	NEW BERN	CARTERET	NC
	39	5500 ULMERTON RD	CLEARWATER	PINELLAS	FL
	40	END OF TALMADGE RD	HAMDEN	NEW HAVEN	CT
<b>KA98265</b>	1	(handhelds w/in areas of Mississippi River & tributaries)			
<b>WFN</b>	1	453 PARK PL	JEFFERSONVILLE	CLARK	IN
	2	E SIDE OF SR 11 APPROXIMATELY 4.3 MI S OF JCT US 460 & SR 11	LANESVILLE	FLOYD	IN
<b>WHV740</b>	2	2400 BARTON CHAPEL RD	AUGUSTA	RICHMOND	GA
<b>WHX877</b>		1799 E Market Street	JEFFERSONVILLE	CLARK	IN
<b>WQGF315</b>		MidAtlantic Region	n/a	n/a	n/a
<b>WQGF316</b>		Mississippi River Region	n/a	n/a	n/a
<b>WQGF317</b>		Great Lakes Region	n/a	n/a	n/a
<b>WQGF318</b>		Southern Pacific Region	n/a	n/a	n/a

**Valuation of Licenses: Appraisal of All Licenses as of June 2008: \$45,200,000.00.**

Maritime Communications/Land Mobile, LLC

Chapter 11; Case No. 11-13463-DWH

Attachment 2 to Schedule B

29. Machinery, fixtures, equipment, and supplies used in business

Description	Site Name	State	County	Class
CROSS MATRIX SWITCH-ADRIAN-CAP	Adrian	IL	Hancock	CE
MICRO VAX -ADRIAN SITE- CAP.IN	Adrian	IL	Hancock	CE
COMPUTER/SMACU - ADRIAN SITE	Adrian	IL	Hancock	CE
ANTENNA - ADRIAN SITE	Adrian	IL	Hancock	CE
CROSS MATRIX SWITCH-ADRIAN SIT	Adrian	IL	Hancock	CE
MICRO VAX - ADRIAN SITE	Adrian	IL	Hancock	CE
RADIO EQUIPMENT - ADRIAN SITE	Adrian	IL	Hancock	CE
SHELTER -ADRIAN SITE- CAP.INT.	Adrian	IL	Hancock	BU
FUEL TANK - ADRIAN SITE	Adrian	IL	Hancock	BU
FENCE - ADRIAN SITE	Adrian	IL	Hancock	BU
SHELTER - ADRIAN SITE	Adrian	IL	Hancock	BU
FOUNDATIONS - ADRIAN SITE	Adrian	IL	Hancock	BU
TOWER - ADRIAN SITE	Adrian	IL	Hancock	CE
ROAD - ADRIAN SITE	Adrian	IL	Hancock	LI
CROSS MATRIX SWITCH-ARABIA-CAP	Arabia	OH	Lawrence	CE
MICRO VAX -ARABIA SITE- CAP. I	Arabia	OH	Lawrence	CE
RADIO EQUIPMENT-ARABIA SITE-CA	Arabia	OH	Lawrence	CE
COMPUTER/SMACU -ARABIA SITE	Arabia	OH	Lawrence	CE
(1) CHANNEL-ARABIA	Arabia	OH	Lawrence	CE
ANTENNA - ARABIA SITE	Arabia	OH	Lawrence	CE
CROSS MATRIX SWITCH -ARABIA SI	Arabia	OH	Lawrence	CE
MICRO VAX -ARABIA SITE	Arabia	OH	Lawrence	CE
RADIO EQUIPMENT - ARABIA SITE	Arabia	OH	Lawrence	CE
SHELTER - ARABIA SITE-CAP. INT	Arabia	OH	Lawrence	BU
FUEL TANK -ARABIA SITE	Arabia	OH	Lawrence	BU
FENCE - ARABIA	Arabia	OH	Lawrence	BU
SITE PREPARATION - ARABIA SITE	Arabia	OH	Lawrence	BU
SHELTER - ARABIA SITE	Arabia	OH	Lawrence	BU
FOUNDATIONS - ARABIA SITE	Arabia	OH	Lawrence	BU
TOWER -ARABIA SITE	Arabia	OH	Lawrence	CE
MICRO VAX - BALD KNOB SITE CAP	Bald Knob	IL	Union	CE
(1) CHANNEL-BALD KNOB	Bald Knob	IL	Union	CE
MICRO VAX - BALD KNOB SITE	Bald Knob	IL	Union	CE
ANTENNA - BALD KNOB SITE	Bald Knob	IL	Union	CE
RADIO EQUIPMENT - BALD KNOB SI	Bald Knob	IL	Union	CE
FUEL TANK - BALD KNOB SITE	Bald Knob	IL	Union	BU
FOUNDATIONS - BALD KNOB SITE	Bald Knob	IL	Union	BU
FENCE - BALD KNOB SITE	Bald Knob	IL	Union	BU
SITE PREPARATION - BALD KNOB S	Bald Knob	IL	Union	BU
SHELTER - BALD KNOB SITE	Bald Knob	IL	Union	BU
TOWER - BALD KNOB SITE	Bald Knob	IL	Union	CE
Labor & Freight for Build-Out	Baltimore	MD	Baltimore	CE
Exciter	Baltimore	MD	Baltimore	CE
Power Amplifier	Baltimore	MD	Baltimore	CE
Receiver	Baltimore	MD	Baltimore	CE
TNT	Baltimore	MD	Baltimore	CE
Power Supply	Baltimore	MD	Baltimore	CE
Build-Out Mini Cabinet	Baltimore	MD	Baltimore	CE
216-225 5.25dB Fiberglass Antenna	Baltimore	MD	Baltimore	CE
AMTS Turnkey System Installation	Baltimore	MD	Baltimore	CE
CROSS MATRIX SWITCH-BASHAN-CAP	Bashan	OH	Meigs	CE

MICRO VAX -BASHAN SITE- CAP. I	Bashan	OH	Meigs	CE
RADIO EQUIPMENT-BASHAN SITE-CA	Bashan	OH	Meigs	CE
COMPUTER/SMACU -BASHAN SITE	Bashan	OH	Meigs	CE
ANTENNA - BASHAN SITE	Bashan	OH	Meigs	CE
CROSS MATRIX SWITCH -BASHAN SI	Bashan	OH	Meigs	CE
MICRO VAX -BASHAN SITE	Bashan	OH	Meigs	CE
RADIO EQUIPMENT - BASHAN SITE	Bashan	OH	Meigs	CE
SHELTER - BASHAN SITE-CAP. INT	Bashan	OH	Meigs	BU
FUEL TANK -BASHAN SITE	Bashan	OH	Meigs	BU
FENCE - BASHAN	Bashan	OH	Meigs	BU
SITE PREPARATION - BASHAN SITE	Bashan	OH	Meigs	BU
SHELTER - BASHAN SITE	Bashan	OH	Meigs	BU
FOUNDATIONS - BASHAN SITE	Bashan	OH	Meigs	BU
TOWER -BASHAN SITE	Bashan	OH	Meigs	CE
ROAD - BASHAN SITE	Bashan	OH	Meigs	LI
CROSS MATRIX SWITCH-BAY ST. L-	Bay St Louis	MS	Harrison	CE
RADIO EQUIPMENT-BAY ST.LOUS-CA	Bay St Louis	MS	Harrison	CE
MICRO VAX - BAY ST. LOUIS - CA	Bay St Louis	MS	Harrison	CE
COMPUTER/SMACU - BAY ST. LOUIS	Bay St Louis	MS	Harrison	CE
ANTENNA - BAY ST. LOUIS SITE	Bay St Louis	MS	Harrison	CE
CROSS MATRIX SWITCH - BAY ST.	Bay St Louis	MS	Harrison	CE
RADIO EQUIPMENT - BAY ST.LOUIS	Bay St Louis	MS	Harrison	CE
MICRO VAX - BAY ST. LOUIS SITE	Bay St Louis	MS	Harrison	CE
SHELTER - BAY ST. LOUIS-CAP.IN	Bay St. Louis	MS	Harrison	BU
FUEL TANK - BAY ST. LOUIS SIT	Bay St. Louis	MS	Harrison	BU
FENCE - BAY ST. LOUIS	Bay St. Louis	MS	Harrison	BU
SHELTER - BAY ST. LOUIS SITE	Bay St. Louis	MS	Harrison	BU
SITE PREPARATION - BAY ST. LOU	Bay St. Louis	MS	Harrison	BU
FOUNDATIONS - BAY ST. LOUIS SI	Bay St. Louis	MS	Harrison	BU
ROAD - BAY ST. LOUIS SITE	Bay St. Louis	MS	Harrison	LI
CROSS MATRIX SWITCH-BAYOU G-CA	Bayou Goula	LA	Iverville Pa	CE
1250 VA POWER SUPPLY	Bayou Goula	LA	Iverville Pa	CE
MICRO VAX - BAYOU GOULA - CAP.	Bayou Goula	LA	Iverville Pa	CE
RADIO EQUIPMENT-BAYOU GOULA-CA	Bayou Goula	LA	Iverville Pa	CE
(1) CHANNEL-BAYOU GOULA	Bayou Goula	LA	Iverville Pa	CE
ANTENNA - BAYOU GOULA SITE	Bayou Goula	LA	Iverville Pa	CE
CROSS MATRIX SWITCH - BAYOU GO	Bayou Goula	LA	Iverville Pa	CE
MICRO VAX - BAYOU GOULA SITE	Bayou Goula	LA	Iverville Pa	CE
RADIO EQUIPMENT - BAYOU GOULA	Bayou Goula	LA	Iverville Pa	CE
SHELTER - BAYOU GOULA - CAP.IN	Bayou Goula	LA	Iverville Pa	BU
FUEL TANK - BAYOU GOULA SITE	Bayou Goula	LA	Iverville Pa	BU
FENCE - BAYOU GOULA SITE	Bayou Goula	LA	Iverville Pa	BU
SITE PREPARATION - BAYOU GOULA	Bayou Goula	LA	Iverville Pa	BU
SHELTER - BAYOU GOULA SITE	Bayou Goula	LA	Iverville Pa	BU
FOUNDATIONS - BAYOU GOULA SITE	Bayou Goula	LA	Iverville Pa	BU
GENERATOR	Bayou Goula	LA	Iverville Pa	CE
TOWER - BAYOU GOULA SITE	Bayou Goula	LA	Iverville Pa	CE
ROAD - BAYOU GOULA SITE	Bayou Goula	LA	Iverville Pa	LI
MICRO VAX - BEDFORD SITE CAP.	Bedford	KY	Trimble	CE
RADIO EQUIPMENT CAP. INT.	Bedford	KY	Trimble	CE
COMPUTER/SMACU - BEDFORD SITE	Bedford	KY	Trimble	CE
ANTENNA - BEDFORD SITE	Bedford	KY	Trimble	CE

CROSS MATRIX SWITCH - BEDFORD	Bedford	KY	Trimble	CE
MICRO VAX - BEDFORD SITE	Bedford	KY	Trimble	CE
RADIO EQUIPMENT - BEDFORD SITE	Bedford	KY	Trimble	CE
FUEL TANK - BEDFORD SITE	Bedford	KY	Trimble	BU
FENCE - BEDFORD SITE	Bedford	KY	Trimble	BU
FOUNDATIONS - BEDFORD SITE	Bedford	KY	Trimble	BU
SHELTER - BEDFORD SITE	Bedford	KY	Trimble	BU
TOWER - BEDFORD SITE	Bedford	KY	Trimble	CE
Labor & Freight for Build-Out	Brown's Hill	ME	Cumberland	CE
Exciter	Brown's Hill	ME	Cumberland	CE
Power Amplifier	Brown's Hill	ME	Cumberland	CE
Receiver	Brown's Hill	ME	Cumberland	CE
TNT	Brown's Hill	ME	Cumberland	CE
Duplexor	Brown's Hill	ME	Cumberland	CE
Power Supply	Brown's Hill	ME	Cumberland	CE
Build-Out Mini Cabinet	Brown's Hill	ME	Cumberland	CE
AMTS Turnkey System Installation	Brown's Hill	ME	Cumberland	CE
AMTS Turnkey System Installation	Brown's Hill	ME	Cumberland	CE
CROSS MATRIX SWITCH-BROWNSVLE-	Brownsville	TX	Willacy	CE
RADIO EQUIPMENT-BROWNSVLE-CAP.	Brownsville	TX	Willacy	CE
MICRO VAX - BROWNSVLE - CAP. I	Brownsville	TX	Willacy	CE
ADD COST REDUNDANCY PROJECT	Brownsville	Tx	Willacy	CE
COMPUTER/SMACU - BROWNSVILLE	Brownsville	TX	Willacy	CE
ANTENNA - BROWNSVILLE	Brownsville	TX	Willacy	CE
CROSS MATRIX SWITCH-BROWNSVILL	Brownsville	TX	Willacy	CE
RADIO EQUIPMENT - BROWNSVILLE	Brownsville	TX	Willacy	CE
CROSS MATRIX SWITCH-BRYANT-CAP	Bryant	IA	Jackson	CE
RADIO EQUIPMENT- BRYANT - CAP.	Bryant	IA	Jackson	CE
MICRO VAX - BRYANT - CAP. INT.	Bryant	IA	Jackson	CE
COMPUTER/SMACU - BRYANT	Bryant	IA	Jackson	CE
(1) CHANNEL-BRYANT	Bryant	IA	Jackson	CE
ANTENNA - BRYANT	Bryant	IA	Jackson	CE
CROSS MATRIX SWITCH - BRYANT	Bryant	IA	Jackson	CE
RADIO EQUIPMENT - BRYANT	Bryant	IA	Jackson	CE
SHELTER - BRYANT - CAP. INT.	Bryant	IA	Jackson	BU
FUEL TANK - BRYANT SITE	Bryant	IA	Jackson	BU
SITE PREPARATION - BRYANT	Bryant	IA	Jackson	BU
SITE PREPARATION - PEORIA SITE	Bryant	IA	Jackson	BU
FOUNDATIONS - BRYANT	Bryant	IA	Jackson	BU
SHELTER - BRYANT	Bryant	IA	Jackson	BU
TOWER - BRYANT SITE	Bryant	IA	Jackson	CE
CSU/DSU- Buck Mtn	Buck Mtn	OR	Lane	CE
Site Equipment - Day Wireless Site - PA	Buck Mtn	OR	Lane	CE
Site Equipment - Day Wireless Site - PA	Capital Peak	WA	Thurston	CE
Labor & Freight for Build-Out	Clearwater	FL	Pinellas	CE
Exciter	Clearwater	FL	Pinellas	CE
Power Amplifier	Clearwater	FL	Pinellas	CE
Receiver	Clearwater	FL	Pinellas	CE
TNT	Clearwater	FL	Pinellas	CE
Duplexor	Clearwater	FL	Pinellas	CE
Power Supply	Clearwater	FL	Pinellas	CE
Build-Out Mini Cabinet	Clearwater	FL	Pinellas	CE