

Revised Table 2 (rev. 3) – Page 4 of 5

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WQGF315	Geo	A	07-Sep-05		N/A		AMT002 - Mid-Atlantic		
WQGF316	Geo	A	07-Sep-05		N/A		AMT004 - Mississippi River		
WQGF317	Geo	A	07-Sep-05		N/A		AMT005 - Great Lakes		
WQGF318	Geo	A	07-Sep-05		N/A		AMT006 - Southern Pacific		
WRD580	VHF/HF	U					VHF & HF @ Milton KY		
WHW848	1	G			N/A		itenrant/mobile		IN
WRV374	2	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MANASSAS	PR. WILLIAM	VA
	3	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	PHILADELPHIA	PHILADELPHIA	PA
	8	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MANGONIA PARK	PALM BEACH	FL
	12	L	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	ORLANDO	ORANGE	FL
	14	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	SELDEN	SUFFOLK	NY
	15	L	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	VERONA	ESSEX	NJ
	16	T	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	ALLENTOWN	LEHIGH	PA
	17	G	15-Jul-99	14-Jul-01	5-Jul-01	RJK_31	WINTERTHUR	NEW CASTLE	DE
	18	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	VALHALLA	WESTCHESTER	NY
	19	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MIAMI	MIAMI-DADE	FL
	20	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	RAYMOND	CUMBERLAND	ME
	22	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	SPAULDING	DUVAL	FL
	23	U	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	CHARLESTON	CHARLESTON	SC
	24	G	03-Feb-99	02-Feb-01	29-Nov-00	RJK_31	CONWAY	HORRY	SC
	25	L	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	PERRINVILLE	MONMOUTH	NJ
	26	O	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	SAVANNAH	CHATHAM	GA
	27	G	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	NAVASSA	BRUNSWICK	NC
	28	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	SUFFOLK	SUFFOLK	VA
	29	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	RICHMOND	RICHMOND	VA
	31	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	BALTIMORE		MD
33	O	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	NEW YORK	NEW YORK	NY	
34	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	FAJARDO	FAJARDO	PR	
35	O	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	REHOBETH	BRISTOL	MA	
36	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	NEW BERN	CARTERET	NC	
39	L	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	CLEARWATER	PINELLAS	FL	
40	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	HAMDEN	NEW HAVEN	CT	

Revised Table 2 (rev. 3) – Page 5 of 5

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
KUF732	1	G	15-Jul-99	14-Jul-01	30-Jun-01	G_022896	ROCHESTER	MONROE	NY
	2	G	24-Aug-99	23-Aug-01	6-Jun-01	G_022928 - G_022931	SYRACUSE	ONONDAGA	NY
	3	G	15-Jul-99	14-Jul-01	25-Jun-01	G_023050 - G_023052	TOLEDO	OTTAWA	OH
	4	G	15-Jul-99	14-Jul-01			DETROIT	WAYNE	MI
	5	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023143 - G_023145	BUFFALO	ERIE	NY
	6	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023222 - G_023224	ERIE	ERIE	PA
	7	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023254 - G_023256	CLEVELAND	CUYAHOGA	OH

Key to Status Codes

- G Station subsumed within geographic license obtained in auction; status of incumbent license not relevant.
- G1 Channel Block A as to all of the WHG licenses are subsumed within geographic license obtained in auction. Second code stated applies to Channel Block B.
- L Station subject to a spectrum lease.
- O Station constructed and operational; some rents and other obligations may be in arrears since bankruptcy.
- T Station temporarily off the air (T1 = loss of tower, site, etc.(various dates; T2 = utilities terminated for non-payment (2010 & early 2011)
- U Maritime not sure of current operational status.

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of March, 2012, I caused copies of the foregoing pleading to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

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Robert J. Keller
Counsel for Maritime
Communications/Land Mobile, LLC

EXHIBIT C

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

In the Matter of)	
)	
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 Authorizations)	
in the Wireless Radio Services;)	
)	
Applicant with ENCANA OIL AND GAS (USA), INC.;)	Application File Nos.
DUQUESNE LIGHT COMPANY; DCP)	0004030479, 0004144435,
MIDSTREAM, LP; JACKSON COUNTY RURAL)	0004193028, 0004193328,
MEMBERSHIP ELECTRIC COOPERATIVE; PUGET)	0004354053, 0004309872,
SOUND ENERGY, INC.; ENBRIDGE ENERGY)	0004310060, 0004314903,
COMPANY, INC.; INTERSTATE POWER AND)	0004315013, 0004430505,
LIGHT COMPANY; WISCONSIN POWER AND)	0004417199, 0004419431,
LIGHT COMPANY; DIXIE ELECTRIC)	0004422320, 0004422329,
MEMBERSHIP CORPORATION, INC.; ATLAS)	0004507921, 0004153701,
PIPELINE—MID CONTINENT, LLC; DENTON)	0004526264, 0004636537,
COUNTY ELECTRIC COOPERATIVE, INC., DBA)	and 0004604962
COSERV ELECTRIC; AND SOUTHERN)	
CALIFORNIA REGIONAL RAIL AUTHORITY)	
)	
For Commission Consent to the Assignment of Various)	
Authorizations in the Wireless Radio Services)	

ERRATA AND ADDITIONAL INFORMATION REGARDING
AMENDED AND FURTHER SUPPLEMENTAL
RESPONSE TO INTERROGATORIES

Maritime Communications/Land Mobile, LLC (“Maritime”) hereby respectfully provides this errata and additional information regarding its *Amended and Further Supplemental Response to Interrogatories* that were served on March 16, 2012 (“*Amended Response*”).

As there in the *Amended Response*, Maritime was in the process of attempting insofar as able to determine more specific time periods related to its answers. In Revised Table 2, Maritime indicated that operations at a number of its station had been temporarily suspended, as indicate

by a “T” status code. (By way of errata, the attached version (rev. 4) of Revised Table 2 has corrected the status codes for WHG693, WHG702, WHG705, WHG721, WHG726, WHG728, and Loc. 16 of WRV374.) Table 3, below, provides the date that such operations were terminated.

Table 3 (Dates of Temporary Suspension of Operations)

Call Sign	Loc	Status	Temporarily Suspended	Reason for Suspension	City	County	ST
WHG693	1	G1, T1	2005	lost tower or site	VENICE	PLAQUEMINES	LA
WHG701	1	G1, T1	2004	lost tower or site	SANTA ROSA BEACH	WALTON	FL
WHG705	1	G1, T2	Apr 2010	utilities disconnected	AMELIA	ASSUMPTION	LA
WHG706	1	G1, T2	Mar 2009	utilities disconnected	INTRACOASTAL CITY	VERMILION	LA
WHG707	1	G1, T1	2005	lost tower or site	PORT ARTHUR	JEFFERSON	TX
WHG713	1	G1, T2	Jan 2011	utilities disconnected	CARVILLE	IBERVILLE	LA
WHG716	1	G1, T2	Sep 2010	utilities disconnected	LAKE CORMORANT	DESOTO	MS
WHG717	1	G1, T2	Aug 2010	utilities disconnected	SAMBURG	OBION	TN
WHG718	1	G1, T2	Apr 2010	utilities disconnected	ALTO PASS	UNION	IL
WHG722	1	G1, T1	May 2011	lost tower or site	ADRIAN	HANCOCK	IL
WHG724	1	G1, T2	Jan 2011	utilities disconnected	MILES	JACKSON	IA
WHG728	1	G1, T	Aug 2011	utilities disconnected	Elizabeth	FLOYD	IN
WHG727	1	G1, T2	May 2010	utilities disconnected	HEBBARDSVILLE	HENDERSON	KY
WHG729	1	G1, T2	Dec 2010	utilities disconnected	BEDFORD	TRIMBLE	KY
WHG730	1	G1, T2	Sep 2010	utilities disconnected	INDEPENDENCE	KENTON	KY
WHG731	1	G1, T2	Mar 2010	utilities disconnected	FAIRVIEW	ADAMS	OH
WHG732	1	G1, T2	Mar 2010	utilities disconnected	LETITIA	GREENUP	KY
WHG736	1	G1, T2	Oct 2011	utilities disconnected	TONICA	LA SALLE	IL
WHG738	1	G1, T2	Feb 2010	utilities disconnected	FORDS FERRY	CRITTENDEN	KY
WHG739	1	G1, T1	Aug 2011	lost tower or site	MOOLEYVILLE	BRECKINRIDGE	KY
WHG740	1	G1, T2	Jan 2010	utilities disconnected	BASHAN	MEIGS	OH
WHG742	1	G1, T2	May 2010	utilities disconnected	LANSING	ALLAMAKEE	IA
WHG744	1	G1, T2	May 2010	utilities disconnected	DIAMOND BLUFF	PIERCE	WI
WHG745	1	G1, T1	2010	lost tower or site	LAUREL HILL	WEST FELICIANA	LA
WHG748	1	G1, T2	Jul 2010	utilities disconnected	FULTON	LAUDERDALE	TN
WHG749	1	G1, T2	Mar 2010	utilities disconnected	SHADYSIDE	BELMONT	OH
WHG753	1	G1, T1	Oct 2009	lost tower or site	PORT LAVACA	CALHOUN	TX
WHG754	1	G1, T1	Aug 2011	lost tower or site	RAYMONDSVILLE	WILLACY	TX

With regard to interconnection, Maritime terminated interconnection capability at all of its stations sometime in the mid to latter part of 2007 after having been advised by regulatory counsel that it was no longer required. None of the stations has been interconnected since that time. Facilities operated by spectrum lessees, however, may be interconnected.

Finally, it has come to the attention of undersigned counsel that tables appended to the *Amended Response* were inadvertently omitted from the paper copies as served by mail. (The tables were, however, in the electronically filed version and in the electronic courtesy copies.) A copy of the Amended Response, including the tables, will be served along with this filing.

Respectfully Submitted,



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Land Mobile, LLC

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PO Box 33428
Washington, D.C. 20033

Dated: March 19, 2012

Revised Table 2 – Page 1 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
KAE889	3	L			30-Sep-99	G_017253	CAMAS	CLARK	WA
	4	L			30-Sep-99	G_017417	RAINIER	THURSTON	WA
	6	U			30-Sep-99	G_017715	SALEM	MARION	OR
	8	G			29-May-99	G_017733	BAKERSFIELD	KERN	CA
	12	O					PHOENIX	JACKSON	OR
	13	L			20-Sep-99	G_018039	PORTLAND	MULTNOMAH	OR
	14	G			26-Feb-98		CORONA	ORANGE	CA
	20	L			29-May-99	G_018374	ORCAS ISLAND	SAN JUAN	WA
	22	U			20-Sep-99	G_018522	EUGENE	LANE	OR
	26	G			20-Sep-99	G_018660	SALINAS	MONTEREY	CA
	27	G					SAN RAFAEL	MARIN	CA
	28	G					WALNUT CREEK	CONTRA COSTA	CA
	30	L			20-Sep-99	G_018962	BREMERTON	JEFFERSON	WA
	33	G			29-May-99	G_019084	LOS GATOS	SANTA CLARA	CA
	34	L			20-Sep-99	G_019195	OLYMPIA	THURSTON	WA
	37	G			29-May-99	G_019323	MODESTO	STANISLAUS	CA
	39	G			29-May-99	G_019481	COALINGA	FRESNO	CA
	40	G			29-May-99	G_019538	PINE VALLEY	SAN DIEGO	CA
	44	G			29-May-99	G_019703	PALMDALE	LOS ANGELES	CA
46	L			20-Sep-99	G_019763	WOODBURN	MARION	OR	
48	L			20-Sep-99	G_019802	SEATTLE	KING	WA	
KCE278	1	G	15-Jul-99	14-Jul-01	25-Jun-01	G_019845 - G_019857	CHARLEVOIX	CHARLEVOIX	MI
	2	G	15-Jul-99	14-Jul-01			ROGERS CITY	PRESQUE ISLE	MI
KPB531	1	G	15-Jul-99	14-Jul-01	21-Jun-01	G_022475 - G_0220476	MUSKEGON	MUSKEGON	MI
	2	G	15-Jul-99	14-Jul-01	6-Jun-01	G_022535 - G_022538	MICHIGAN CITY	LA PORTE	IN
	3	G	15-Jul-99	14-Jul-01	6-Jun-01	G_022582	KENOSHA	KENOSHA	WI
	4	G	15-Jul-99	14-Jul-01	13-Jul-01	G_022669 - G_022671	MILWAUKEE	MILWAUKEE	WI
	5	G	26-May-00	26-May-02	17-May-02	G_022720	LAKE ZURICH	LAKE	IL
WHG693	1	G1, T1				VENICE	PLAQUEMINES	LA	
WHG701	1	G1, T1				SANTA ROSA BEACH	WALTON	FL	
WHG702	1	G1, U				THEODORE	MOBILE	AL	

Revised Table 2 – Page 2 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WHG703	1	G1, O					DELISLE	HARRISON	MS
WHG705	1	G1, T2					AMELIA	ASSUMPTION	LA
WHG706	1	G1, T2					INTRACOASTAL CITY	VERMILION	LA
WHG707	1	G1, T1					PORT ARTHUR	JEFFERSON	TX
WHG708	1	G1, U					DICKINSON	GALVESTON	TX
WHG709	1	G1, O					BAY CITY	MATAGORDA	TX
WHG710	1	G1, U					ARANSAS PASS	SAN PATRICIO	TX
WHG711	1	G1, U					RIVIERA	KLEBERG	TX
WHG712	1	G1, O					JEFFERSON HEIGHTS	JEFFERSON	LA
WHG713	1	G1, T2					CARVILLE	IBERVILLE	LA
WHG714	1	G1, O					REDWOOD	WARREN	MS
WHG715	1	G1, O					WAYSIDE	WASHINGTON	MS
WHG716	1	G1, T2					LAKE CORMORANT	DESOTO	MS
WHG717	1	G1, T2					SAMBURG	OBION	TN
WHG718	1	G1, T2					ALTO PASS	UNION	IL
WHG719	1	G1, O					MADONNAVILLE	MONROE	IL
WHG720	1	G1, O					GRAFTON	JERSEY	IL
WHG721	1	G1, O					SAVERTON	RALLS	MO
WHG722	1	G1, T1					ADRIAN	HANCOCK	IL
WHG723	1	G1, O					REYNOLDS	ROCK ISLAND	IL
WHG724	1	G1, T2					MILES	JACKSON	IA
WHG725	1	G1, O					SHERRILL	DUBUQUE	IA
WHG726	1	G1, O					MIDWAY	MASSAC	IL
WHG727	1	G1, T2					HEBBARDSVILLE	HENDERSON	KY
WHG728	1	G1, T2					ELIZABETH	FLOYD	IN
WHG729	1	G1, T2					BEDFORD	TRIMBLE	KY
WHG730	1	G1, T2					INDEPENDENCE	KENTON	KY
WHG731	1	G1, T2					FAIRVIEW	ADAMS	OH
WHG732	1	G1, T2					LETITIA	GREENUP	KY
WHG733	1	G1, O					GREASY RIDGE	LAWRENCE	OH
WHG734	1	G1, O					MEREDOSIA	MORGAN	IL

Revised Table 2 – Page 3 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WHG735	1	G1, O					HANNA CITY	PEORIA	IL
WHG736	1	G1, T2					TONICA	LA SALLE	IL
WHG737	1	G1, O					LOCKPORT	WILL	IL
WHG738	1	G1, T2					FORDS FERRY	CRITTENDEN	KY
WHG739	1	G1, T1					MOOLEYVILLE	BRECKINRIDGE	KY
WHG740	1	G1, T2					BASHAN	MEIGS	OH
WHG741	1	G1, O					BROWNSVILLE	MONROE	OH
WHG742	1	G1, T2					LANSING	ALLAMAKEE	IA
WHG743	1	G1, O					WITOKA	WINONA	MN
WHG744	1	G1, T2					DIAMOND BLUFF	PIERCE	WI
WHG745	1	G1, T1					LAUREL HILL	WEST FELICIANA	LA
WHG746	1	G1, O					PINE RIDGE	ADAMS	MS
WHG747	1	G1, T2					RENA LARA	COAHOMA	MS
WHG748	1	G1, T2					FULTON	LAUDERDALE	TN
WHG749	1	G1, T2					SHADYSIDE	BELMONT	OH
WHG750	1	G1, O					HOOKSTOWN	BEAVER	PA
WHG751	1	G1, O					AVALON BEACH	SANTA ROSA	FL
WHG752	1	G1, O					LAKE CHARLES	CALCASIEU	LA
WHG753	1	G1, T1					PORT LAVACA	CALHOUN	TX
WHG754	1	G1, T1					RAYMONDSVILLE	WILLACY	TX
WHV733	1	U					STOKES COUNTY	STOKES	NC
	2	U					HILLSBOROUGH	ORANGE	NC
	3	U					ROCKFISH	CUMBERLAND	NC
WHV740	2	U				AUGUSTA	RICHMOND	GA	
WHV843	1	U					CEASARS HEAD	GREENVILLE	SC
	5	U					GASTONIA	GASTON	NC
	6	U					LITTLE MOUNTAIN	NEWBERRY	SC
KA98265	Mobile	N/A			N/A	handhelds nr Mississippi & tributaries			
WFN	VHF/HF	U				VHF & HF Jeffersonville/Lanesville IN			
WHX877	HF	U				HF Jeffersonville IN			

Revised Table 2 – Page 4 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WRV374	2	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MANASSAS	PR. WILLIAM	VA
	3	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	PHILADELPHIA	PHILADELPHIA	PA
	8	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MANGONIA PARK	PALM BEACH	FL
	12	L	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	ORLANDO	ORANGE	FL
	14	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	SELDEN	SUFFOLK	NY
	15	L	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	VERONA	ESSEX	NJ
	16	U	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	ALLENTOWN	LEHIGH	PA
	17	G	15-Jul-99	14-Jul-01	5-Jul-01	RJK_31	WINTERHUR	NEW CASTLE	DE
	18	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	VALHALLA	WESTCHESTER	NY
	19	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MIAMI	MIAMI-DADE	FL
	20	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	RAYMOND	CUMBERLAND	ME
	22	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	SPAULDING	DUVAL	FL
	23	U	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	CHARLESTON	CHARLESTON	SC
	24	G	03-Feb-99	02-Feb-01	29-Nov-00	RJK_31	CONWAY	HORRY	SC
	25	L	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	PERRINVILLE	MONMOUTH	NJ
	26	O	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	SAVANNAH	CHATHAM	GA
	27	G	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	NAVASSA	BRUNSWICK	NC
	28	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	SUFFOLK	SUFFOLK	VA
	29	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	RICHMOND	RICHMOND	VA
	31	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	BALTIMORE		MD
33	O	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	NEW YORK	NEW YORK	NY	
34	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	FAJARDO	FAJARDO	PR	
35	O	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	REHOBETH	BRISTOL	MA	
36	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	NEW BERN	CARTERET	NC	
39	L	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	CLEARWATER	PINELLAS	FL	
40	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	HAMDEN	NEW HAVEN	CT	
WQGF315	Geo	A	07-Sep-05		N/A		AMT002 - Mid-Atlantic		
WQGF316	Geo	A	07-Sep-05		N/A		AMT004 - Mississippi River		
WQGF317	Geo	A	07-Sep-05		N/A		AMT005 - Great Lakes		
WQGF318	Geo	A	07-Sep-05		N/A		AMT006 - Southern Pacific		

Revised Table 2 – Page 5 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WRD580	VHF/HF	U					VHF & HF @ Milton KY		
WHW848	1	G			N/A		Itinerant/mobile		IN
KUF732	1	G	15-Jul-99	14-Jul-01	30-Jun-01	G_022896	ROCHESTER	MONROE	NY
	2	G	24-Aug-99	23-Aug-01	6-Jun-01	G_022928 - G_022931	SYRACUSE	ONONDAGA	NY
	3	G	15-Jul-99	14-Jul-01	25-Jun-01	G_023050 - G_023052	TOLEDO	OTTAWA	OH
	4	G	15-Jul-99	14-Jul-01			DETROIT	WAYNE	MI
	5	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023143 - G_023145	BUFFALO	ERIE	NY
	6	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023222 - G_023224	ERIE	ERIE	PA
	7	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023254 - G_023256	CLEVELAND	CUYAHOGA	OH

Key to Status Codes

- G Station subsumed within geographic license obtained in auction; status of incumbent license not relevant.
- G1 Channel Block A as to all of the WHG licenses are subsumed within geographic license obtained in auction. Second code stated applies to Channel Block B.
- L Station subject to a spectrum lease.
- O Station constructed and operational; some rents and other obligations may be in arrears since bankruptcy.
- T Station temporarily off the air (T1 = loss of tower, site, etc.; T2 = utilities terminated for non-payment). See Table 3 for dates.
- U Maritime not sure of current operational status.

Declaration of Robert T. Smith

I, Robert T. Smith, state that I have assisted in the preparation of and have reviewed a final draft of the ERRATA AND ADDITIONAL INFORMATION REGARDING AMENDED AND FURTHER SUPPLEMENTAL RESPONSE TO INTERROGATORIES being filed in Federal Communications Commission EB Docket No. 11-71; that I am generally familiar with the factual matters addressed in said response; and that the factual assertions made in the response are, to the best of my knowledge, information, and belief, are true and accurate, and are made in good faith.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this ___ day of March, 2012.

Robert T. Smith

NOTE: Mr. Smith is currently on the road and unable to print and sign this declaration today. He has, however, reviewed the final draft of the foregoing document and has orally verified it to counsel. An executed copy of this declaration will be submitted upon receipt by counsel.

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March, 2012, I caused copies of the foregoing pleading to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

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Robert J. Keller
Counsel for Maritime
Communications/Land Mobile, LLC

EXHIBIT D

EB

TRANSCRIPT OF PROCEEDINGS

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of:

Maritime Communications/Land Mobile, LLC

EB Docket No. 11-71

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2011 NOV - 4 P 2:43
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DATE OF HEARING: October 25, 2011 VOLUME: 2

PLACE OF HEARING: WASHINGTON, D.C. PAGES: 116-296

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116

180
+ 1

181

1 MS. KANE: Your Honor?

2 JUDGE SIPPEL: Anything more?

3 MS. KANE: Yes --

4 JUDGE SIPPEL: Go ahead.

5 MS. KANE: -- there's one more issue.

6 I think we tabled the issue of Maritime's
7 responses to the request for admissions. If
8 it's, in fact, correct that some of these issues
9 that Mr. Keller says should be, you know, issues
10 of law, that certainly, corrected responses to
11 the request for admissions would be relevant to
12 that issue and would inform some of those issues
13 going forward. This was all information that
14 was due within 20 days of the HDO being issued
15 in early June. Your Honor ordered it in August.
16 This is all information in their possession, and
17 could certainly only serve to simplify the
18 issues going forward.

19 MR. KELLER: I will have to go back
20 and this is a request for admission? I have to,
21 I mean, I don't remember right now what all
22 those were. I would have to look at the actual

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1 requests before I could respond to that.

2 JUDGE SIPPEL: Well, my order covered
3 it in requiring the corrections to be made, but
4 you can go back as far as you need to go. I'm
5 going to want to see those responses made. I
6 don't see them being burdensome, and I'm not
7 going to listen to the argument that we're
8 running out of money. I mean, it's, that's just
9 not an answer. You're going to be in default,
10 and you know, there's a different price to pay.
11 I think I've got it down.

12 MR. MCFADDEN: Your Honor, if I may,
13 just one more thing and then I promise I'll
14 stop. I believe Your Honor had directed, I
15 wasn't quite clear, I believe Your Honor
16 directed the Bureau to submit requests for leave
17 to allow discovery with respect to the site-
18 based licenses. Did you want to see a request
19 for leave from Skytel and the Bureau, jointly,
20 or do you want us to comment on their request,
21 or do you have any preference at all?

22 MS. KANE: I think we could work with

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Maritime Communications/Land Mobile, LLC

Name of Hearing

EB DOCKET NO. 11-71

Docket No. (if applicable)

445 12th STREET, S.W., WASHINGTON, D.C.

Place of Hearing

October 25, 2011

Date of Hearing

We, the undersigned, do hereby certify that the foregoing pages, numbers 116 through 296, inclusive, are the true, accurate and complete transcript prepared from the reporting by Eric Hendrixson (Reporter's Name) in attendance at the above identified hearing, in accordance with applicable provisions of the current Federal Communications Commission's professional verbatim reporting and transcription statement of Work and have verified the accuracy of the accuracy of the transcript by (1) comparing the typewritten transcript against the reporting or recording accomplished at the hearings and (2) comparing the final proofed typewritten transcript against the reporting or recording accomplished at the hearing or conference.

October 25, 2011

Eric Hendrixson

Eric Hendrixson

Date

Legible Name and Signature of Reporter

Name of Company: Neal Gross Co.

October 25, 2011

Clark Fork

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Date

Legible Name and Signature of Transcriber

Name of Company: Neal Gross Co.

October 25, 2011

Tracy Cain

Tracy Cain

Date

Legible Name and Signature of Proofreader

Name of Company: Neal Gross Co.

EXHIBIT E

MARITIME'S INTERROGATORY DEFICIENCIES AS OF 3/20

No.	Text of the Interrogatory	Maritime's Amended Response	What is still missing
13	Identify each site-based authorization for which a station is currently operating and whether that station has been in continuous operation	Confirmed only that certain locations of certain of site-based authorizations are <i>capable</i> of transmitting a signal – and not that such locations are <i>currently</i> transmitting a signal ¹ <i>Refused</i> to verify the operating status of each location of 60 of the 67 site-based authorizations at issue ²	Confirmation for each location of each of Maritime's site-based authorizations (1) whether it is currently operating (<i>i.e.</i> , on-the-air, transmitting a signal) and (2) whether it has been in continuous operation (<i>i.e.</i> , continuously on-the-air, transmitting a signal) since its construction.
14	Identify, by call sign and location, (1) each site-based authorization for which a station's operation was discontinued for more than a year; (2) the dates such operation was discontinued and when, if applicable, it resumed; and (3) the reasons why the operation was discontinued	3/16: Maritime "is not able to provide a discrete, exact timeframe during which particular stations were not operating" 3/16: <i>Refused</i> to "verify the specific operational status of each of its locations to determine where, when, and for how long there may have been ... temporary discontinuance" 3/19: Directs Bureau to look to Table 3 which provides dates on which a station's operations were temporarily suspended and why, but not whether operations were resumed ³	Confirmation of whether operations of the stations listed in Table 3 of the Errata have resumed since the date of their temporary suspension and the date(s) on which any such operations resumed
15	Identify any stations currently off-the-air, and if so, explain why and for how long this has been the case	Directs Bureau to response to Interrogatory No. 14, but nothing in the response to Interrogatory No. 14 identifies which calls signs and locations are currently off-the-air, for how long that has been true, and why Directs Bureau to Revised Table 2, but the chart did not identify which calls signs and locations are currently off-the-air, for how long that has been true, and why	Whether any station under any call sign is currently off the air, and, if so, for how long, and why

¹ See Maritime's Amended and Further Supplemental Response to Interrogatories (Amended Responses) filed with the Bureau's Status Report as Exhibit B at pp. 4-5.

² *Id.* at p. 5. Maritime asserts that because these locations are subsumed within the scope of Maritime's geographic licenses, their status is irrelevant and as a result, "Maritime has not attempted to verify the status of these facilities." *Id.* This directly contradicts what Maritime represented to the Presiding Judge during the January 25, 2012 Prehearing Conference. At the Prehearing Conference, Maritime represented it was **not** going to withhold discovery on this basis. See 1/25/12 Transcript at p. 397, attached hereto. In addition, there is no legal basis – and Maritime offers none – for why the information requested is not relevant. Moreover, pursuant to the Commission's rules, Maritime was required to serve any objections it had – including relevance objections – at the time it filed its original interrogatory responses on February 6, 2012. See 47 C.F.R. § 1.323(b). Maritime failed to do so at that time and as such, has waived its right to assert any such objection now.

³ On March 19, 2012, Maritime filed a pleading entitled "Errata and Additional Information Regarding Amended and Further Supplemental Response to Interrogatories" which includes a table identifying dates of temporary suspension of operations (Errata). A copy of this pleading is filed with the Bureau's Status Report as Exhibit C. Maritime does not identify which interrogatory this table is intended to respond to. Assuming it is intended to supplement Maritime's response to Interrogatory No. 14, it still fails to identify whether any operations resumed at these stations.

TRANSCRIPT OF PROCEEDINGS

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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2012 FEB -6 P 2:19

In the Matter of:

Maritime Communications/Land Mobile, LLC et al.

EB Docket No. 11-71

For commission consent to assignment of various authorizations in wireless radio service

DATE OF HEARING: January 25, 2012 VOLUME: 3

PLACE OF HEARING: WASHINGTON, D.C. PAGES: 297-436

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1 down with Bureau counsel and --

2 MR. PLACHE: Absolutely. We
3 would like to do that, and I will arrange it
4 with Ms. Kane.

5 JUDGE SIPPEL: Fine.

6 MR. PLACHE: We are willing and
7 happy to cooperate.

8 JUDGE SIPPEL: I am going to
9 assume that that is being undertaken, and then
10 is that satisfactory to you now as a starter,
11 obviously?

12 MS. KANE: Absolutely, Your Honor.
13 We were planning on starting that. Obviously,
14 we would like to also know what the general
15 timeline is for us to obtain all of this
16 discovery.

17 JUDGE SIPPEL: Well, that is what
18 I am going to --

19 MR. MR. KELLER: Your Honor,
20 excuse me. May I? Before we get on to the
21 general timeline, I just wanted to say a
22 couple of quick -- clarify a couple of quick

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1 things about this issue, which is responding
2 to the outstanding discovery request.

3 Ms. Kane is correct. We did state
4 in our filing that we were prepared to move
5 forward on Issue G and would respond to the
6 discovery request upon the order of Your
7 Honor. We stated in there that we were
8 prepared to respond to those requests within
9 10 days of the order. That is the time for
10 one form of discovery. I think the other one
11 has 14 days, but to show good faith, we are
12 going to give them the four days.

13 So I am assuming your order will
14 be out today or tomorrow. So it will be 10
15 days from today that we would be doing that.

16 She also said we did not object to
17 the scope of the discovery. That is accurate.
18 I just want to make one thing clear, so that
19 nobody is sort of caught off guard.

20 While we will be fully responding
21 to all the questions, it is going to be
22 subject to a caveat. We are going to suggest

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1 that a lot of these site based licenses are
2 subsumed within geographic licenses, and we
3 believe that, therefore, that sort of moots
4 the issue.

5 We can explain all that later, but
6 my point is we are not going to withhold
7 discovery on that basis, but we are going to
8 be stating up front as a caveat that we are
9 not, in providing the discovery, conceding
10 that issue.

11 Then finally, an issue that I
12 wanted to bring up, because again I don't want
13 this to come as a surprise after the hearing.
14 One of the things the Commission requested
15 with a document request were all documents
16 relating to this.

17 JUDGE SIPPEL: The Commission or
18 the Bureau?

19 MR. KELLER: The Bureau. I'm
20 sorry, the Bureau asked. That is on of the
21 things in the discovery request, a request for
22 production of documents.

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Maritime Communications/Land Mobile, LLC

Name of Hearing

EB DOCKET NO. 11-71

Docket No. (if applicable)

445 12th STREET, S.W., WASHINGTON, D.C.

Place of Hearing

January 25, 2012

Date of Hearing

We, the undersigned, do hereby certify that the foregoing pages, numbers 297 through 436, inclusive, are the true, accurate and complete transcript prepared from the reporting by John Mongoven (Reporter's Name) in attendance at the above identified hearing, in accordance with applicable provisions of the current Federal Communications Commission's professional verbatim reporting and transcription statement of Work and have verified the accuracy of the accuracy of the transcript by (1) comparing the typewritten transcript against the reporting or recording accomplished at the hearings and (2) comparing the final proofed typewritten transcript against the reporting or recording accomplished at the hearing or conference.

January 25, 2012

John Mongoven

Date

Legible Name and Signature of Reporter
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January 25, 2012

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CERTIFICATE OF SERVICE

Makia Day, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 20th day of March, 2012, sent by first class United States mail copies of the foregoing "ENFORCEMENT BUREAU'S STATUS REPORT ON MARITIME'S DISCOVERY DEFICIENCIES AND REQUEST FOR PRESIDING JUDGE'S INTERVENTION" 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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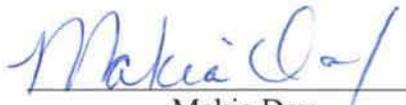
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