

JUL 25 2012

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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: Puget Sound Energy, Inc.

**ENFORCEMENT BUREAU’S FIRST SET OF REQUESTS FOR THE
PRODUCTION OF DOCUMENTS TO PUGET SOUND ENERGY, INC.**

1. The Enforcement Bureau (“Bureau”), pursuant to Section 1.325 of the Commission’s rules, 47 C.F.R. § 1.325, hereby requests that Puget Sound Energy, Inc. (“Puget Sound”) produce the Documents, as defined and specified herein, and deliver the

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Documents to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12th Street, S.W., Washington, D.C. 20554 (or at some other location that is mutually acceptable to the Bureau and Puget Sound within ten (10) days of the date of this Document Request.

Definitions

- a. As used herein, the term “you” or “your” or “Puget Sound” means Puget Sound Energy, Inc., 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, attorneys, and any other persons working for or on behalf of any of the foregoing during the period January 1, 2002 through the present.
- b. “Act” shall mean the Communications Act of 1934, as amended.
- c. “AMTS” shall mean Automated Maritime Telecommunications Systems as defined in the Rules.
- d. “Commission” or “FCC” shall mean the Federal Communications Commission.
- e. “Rules” means the Commission’s regulations found in Title 47 of the Code of Federal Regulations.
- f. “Site-based Authorization” or “License” shall mean each authorization identified in Attachment A to *Maritime Communications/Land Mobile, LLC*, Order to Show Cause, Hearing Designation Order, and Notice of Opportunity for Hearing, EB Docket No. 11-71, FCC-11-64, rel. April 19, 2011 (“HDO”) except authorizations WQGF315, WQGF316, WQGF317, and WQGF318.

g. 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.

h. “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.

i. 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.

j. 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.

k. 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.

1. 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.

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

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

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

p. 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.

q. “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.

r. “Communication” means any discussion or any written or electronic correspondence or recorded voice message of any kind.

s. “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.

t. “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.

u. “Entity” means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

v. “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.

w. “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, attorneys, 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.

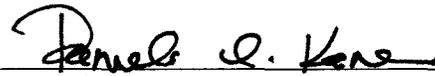
DOCUMENTS REQUESTED

1. All agreements, contracts or understandings entered into between you and Maritime for the lease of Site-based Authorizations licensed to Maritime.
2. Documents sufficient to identify by call sign and location each Site-based Authorization you lease or have leased from Maritime.
3. Documents sufficient to demonstrate the date on which the facility at each location of each Site-based Authorization you lease(d) from Maritime was constructed.
4. Documents sufficient to demonstrate the date on which the facility at each location of each Site-based Authorization you lease(d) from Maritime was placed in operation.
5. Documents sufficient to show the coverage area provided by the facility at each location of each Site-based Authorization you lease(d) from Maritime.
6. Documents sufficient to identify all payments you have made to Maritime pursuant to any agreement produced in response to Request Number 1.
7. Documents sufficient to identify payments you have made to Maritime for AMTS service offered by you.

8. All Documents evidencing each Communication between you (or any Representative of yours) and Maritime referring or relating to your lease with Maritime or Maritime's Site-based Authorizations.

Respectfully,

P. Michele Ellison
Chief, Enforcement Bureau



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

Brian J. Carter
Attorney
Investigations and Hearings Division
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July 25, 2012

CERTIFICATE OF SERVICE

Makia Day, an Enforcement Analyst in the Enforcement Bureau’s Investigations and Hearings Division, certifies that she has on this 25th day of July, 2012, sent by first class United States mail copies of the foregoing “ENFORCEMENT BUREAU’S FIRST SET OF REQUESTS FOR THE PRODUCTION OF DOCUMENTS TO PUGET SOUND ENERGY, INC.” 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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