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August 29, 2012

FILED/ACCEPTED

AUG 29 2012

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554



ATLANTA

BOSTON

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NEW YORK

SILICON VALLEY

SOUTHERN CALIFORNIA

TWIN CITIES

WASHINGTON, DC

Re: *In re Maritime Communications/Land Mobile, LLC*, EB Docket No. 11-71;
Responses of Puget Sound Energy, Inc. to Enforcement Bureau's First Set of
Requests for Production of Documents

Dear Ms. Dortch:

Enclosed for filing please find the original and six (6) copies of Puget Sound Energy, Inc.'s Responses to the Enforcement Bureau's First Set of Requests for the Production of Documents in the Commission's pending hearing proceeding in EB Docket No. 11-71.

Please date-stamp the enclosed extra copy of this filing and return it with the courier in the self-addressed envelope provided.

If you should have any questions, please do not hesitate to contact the undersigned at (202) 626-7761.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jeffrey L. Sheldon'.

Jeffrey L. Sheldon

Counsel for Puget Sound Energy, Inc.

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

AUG 29 2012

Federal Communications Commission
Office of the Secretary

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)	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: Office of the Secretary
Attn: The Honorable Richard L. Sippel
Presiding Judge

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

Puget Sound Energy, Inc. ("PSE"), for its responses to the Enforcement Bureau's ("Bureau") first set of requests for the production of documents, states as follows:

GENERAL OBJECTIONS

PSE herein endeavors to respond to the Bureau's document requests as fully and completely as possible and to the best of its information and belief. For the sole purpose of preserving its rights in this proceeding, PSE states that its responses are subject to, qualified by, and limited by the following General Objections which apply to each specific document request as if incorporated and set out in full in response to each.

1. PSE generally objects to each document request to the extent it requires PSE to provide information or production of documents not within its possession, custody, control, or present knowledge.

2. PSE generally objects to the document requests to the extent that they are overly broad, unduly burdensome, and seek discovery of information or documents that are not relevant to any claim raised by the Bureau.

3. PSE generally objects to the Bureau's document requests to the extent that they seek information or production of documents protected by the attorney-client privilege, the work product doctrine, the party communication privilege, or any other legally recognized privilege, immunity, or doctrine.

4. PSE generally objects to the Bureau's document requests to the extent that they seek information or documents protected from disclosure by a third party confidentiality agreement, statute, regulation, administrative order, or case law.

5. PSE generally objects to the Bureau's document requests insofar as they seek confidential and/or proprietary information or documents. To the extent not otherwise objectionable or containing trade secrets, PSE will respond or produce documents or other materials which contain confidential and/or proprietary information consistent with the

Protective Order governing use of such documents and information as approved by the Administrative Law Judge.

SPECIFIC RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

PSE submits these responses without prejudice to PSE's right to object to further discovery and reserves the right to supplement any response herein at any time. PSE's responses below that it will produce certain documents in response to document requests should be taken not as representations that such documents exist but as an undertaking to locate and produce relevant, non-privileged documents, if they exist and can be found.

1. All agreements, contracts or understandings entered into between you and Maritime for the lease of Site-based Authorizations licensed to Maritime.

RESPONSE: Subject to and without waiving the above general and specific objections, and subject to the Protective Order issued by the Administrative Law Judge in this proceeding, responsive documents are being produced as Attachment A hereto.

2. Documents sufficient to identify by call sign and location each Site-based Authorization you lease or have leased from Maritime.

RESPONSE: Subject to and without waiving the above general and specific objections, and subject to the Protective Order issued by the Administrative Law Judge in this proceeding, PSE responds that the documents being produced in response to Request No. 1, above, include documents responsive to this request.

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.

RESPONSE: Subject to and without waiving the above general and specific objections, PSE responds as follows:

On May 25, 2012, approximately two years after the conclusion of the Asset Purchase Agreement and Spectrum Manager Lease Agreement between Maritime and PSE, Maritime provided PSE with electronic copies in PDF format of documents that Maritime represented as old station records pertaining to the Maritime license covered by the Parties' agreements. Maritime represented to PSE that these documents, all of which are marked with sequential Bates numbers, were previously produced by Maritime to the Enforcement Bureau in the course of discovery in this proceeding and thus are already in the Bureau's possession. The Bates number ranges affixed by Maritime to these documents are as follows: G_017390 through G_017510; G_018222 through G_018403; G_018849 through G_018999; G_019085 through G_019207; and G_019771 through G_019803.

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 into operation.

RESPONSE: See PSE's response to Request No. 3, above.

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.

RESPONSE: Subject to and without waiving the above general and specific objections, and subject to the Protective Order issued by the Administrative Law Judge in this proceeding, PSE responds as follows: Maritime provided a map to PSE depicting Maritime's coverage from the five (5) locations on Call Sign KAE889 for which PSE has a Spectrum Manager Lease from Maritime. This map was included as Exhibit A to the Spectrum Manager Lease Agreement and is included in the documents being produced in response to Request No. 1, above.

As discussed in PSE's response to Request No. 3, above, on May 25, 2012, Maritime provided PSE with electronic copies in PDF format of documents that Maritime represented as old station records pertaining to the Maritime license covered by the Parties' agreements. Maritime represented to PSE that these documents, all of which are marked with sequential Bates numbers, were previously produced by Maritime to the Enforcement Bureau in the course of discovery in this proceeding and thus are already in the Bureau's possession. The Bates number ranges affixed by Maritime to these documents are as follows: G_017390 through G_017510; G_018222 through G_018403; G_018849 through G_018999; G_019085 through G_019207; and G_019771 through G_019803.

6. Documents sufficient to identify all payments you have made to Maritime pursuant to any agreement produced in response to Request Number 1.

RESPONSE: Subject to and without waiving the above general and specific objections, and subject to the Protective Order issued by the Administrative Law Judge in this proceeding, responsive documents are being produced in Attachment B hereto.

7. Documents sufficient to identify payments you have made to Maritime for AMTS service offered by you.

RESPONSE: Subject to and without waiving the above general and specific objections, PSE responds that it has not made any such payments to Maritime because PSE does not offer AMTS service.

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.

RESPONSE: PSE objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks discovery of information or documents that are not relevant to any claim raised by the Bureau. Subject to and without waiving the above general and specific objections, and subject to the Protective Order issued by the Administrative Law Judge in this proceeding, responsive documents are being produced as Attachment C hereto.



Jeffrey L. Sheldon
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Counsel for Puget Sound Energy, Inc.

Dated: August 29, 2012

DECLARATION

I, Charlie Seese, state that I am the Manager Telecommunications Services of Puget Sound Energy, Inc.; that I have assisted in the preparation of and have reviewed the response of Puget Sound Energy, Inc. to the Enforcement Bureau's First Set of Requests for Production of Documents to Puget Sound Energy, Inc., dated July 25, 2012, in EB Docket No. 11-71 before the Federal Communications Commission; that I am familiar with the factual matters addressed in said response; and that the factual assertions made in said response are, to the best of my knowledge, information, and belief, 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 29 day of August, 2012.

A handwritten signature in cursive script, appearing to read 'C Seese', is written above a horizontal line.

Charlie Seese

CERTIFICATE OF SERVICE

I, David D. Rines, do hereby certify that on this 29th day of August, 2012, a single copy (unless otherwise noted) of the foregoing “Responses of Puget Sound Energy, Inc., to the Enforcement Bureau’s First Set of Requests for Production of Documents” was delivered to the following by electronic mail and first-class mail unless otherwise indicated:

Marlene H. Dortch (hand delivery) (**ORIGINAL PLUS 6 COPIES**)
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Hon. Richard L. Sippel (e-mail only)
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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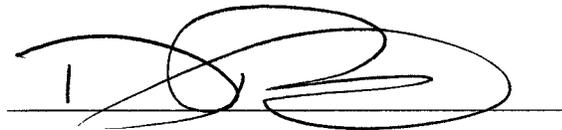
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Attn: J. Stobaugh

A handwritten signature in black ink, consisting of a series of loops and a vertical stroke, positioned above a horizontal line.