

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In re Applications of ) File Nos. 0003119927, 0003119928,  
Green Flag Wireless, LLC ) 0003119925, 0003119926

In the Matter of ) WT Docket No. 10-112  
Amendment of Parts 1, 22, 24, 27, 74, 80, 90, )  
95, and 101 to Establish Uniform License Renewal )  
Discontinuance of Operation, and Geographic )  
Partitioning and Spectrum Disaggregation Rules )  
And Policies for Certain Wireless Radio Services )

To: The Commission

**REQUEST FOR APPROVAL OF SETTLEMENT AGREEMENT AND DISMISSAL OF  
COMPETING APPLICATIONS AND RELATED PLEADINGS**

Pursuant to a settlement agreement between Green Flag Wireless, LLC (“Green Flag”) and Stratos Offshore Services Company (“Stratos”), Green Flag hereby requests dismissal, with prejudice, of the captioned applications filed by Green Flag for new licenses in the Gulf of Mexico MEA and REAG. These applications are mutually exclusive with the applications for renewal<sup>1</sup> of Stratos’s Wireless Communications Service (WCS) licenses for the Gulf of Mexico (Call signs KNLB319, KNLB321, KNLB320 and KNLB212) (the “Stratos WCS Authorizations”). In addition, Green Flag also requests dismissal, with prejudice, of (i) its August 6, 2010 Petition for Reconsideration filed with the FCC in WT Docket No. 10-112 to the extent that petition objects to the grant of the renewals of, or otherwise relates to, the Stratos WCS Authorizations and (ii) its October 22, 2010 Petition for Reconsideration filed with the

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<sup>1</sup> The Stratos WCS license renewal applications were represented by FCC File Nos. 0003099720, 0003099839, 0003099830 and 0003099774.

FCC with respect to FCC File Nos. 0003099720, 0003099839, 0003099830 and 0003099774, to the extent it challenges the conditional grant of each of the Stratos WCS Authorizations.<sup>2</sup>

The dismissal of the referenced applications and pleadings is requested pursuant to a settlement agreement between the parties calling for no cash consideration. Rather, the parties have agreed on the dismissal of these applications and related pleadings and have also agreed not to file any further pleadings against each other with respect to the Stratos WCS Authorizations or with respect to Green Flag's competing applications for other WCS licenses. The terms of that settlement agreement are provided at Attachment A.

The Commission recognized in *Wireless Telecomms. Bureau Grants Limited Waiver to Facilitate Resolution of Competing Renewal Applications*, WT Dkt No. 10-112, Public Notice, DA 12-1407 (rel. Aug. 28, 2012) ("*August 28, 2012 Public Notice*") that resolution competing renewal applications will serve the public interest by removing a long-standing cloud on the WCS band. The agreement between the parties and dismissal of the four competing applications and related pleadings will further the public interest as envisioned by the Commission and should therefore be approved.

Respectfully submitted,

**Green Flag Wireless, LLC;  
CWC Wireless Holdings, Inc.;;  
NTCH-CA, Inc.;;  
James McCotter**

**Stratos Offshore Services Company**

By: \_\_\_\_\_/s/\_\_\_\_\_  
Donald J. Evans

By: \_\_\_\_\_/s/\_\_\_\_\_  
Christine M. Crowe

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<sup>2</sup> CWC Wireless Holdings, Inc., NTCH-CA, Inc., and James McCotter were also parties to the two cited petitions. Because they do not have applications pending with respect to the Gulf or Stratos, their involvement was limited to other markets with respect to which they have mutually exclusive applications. Nevertheless, CWC, NTCH-CA and McCotter also agree, to the extent they have standing to do so, to dismiss the pleadings cited above to the extent indicated above.

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## ATTACHMENT A

### SETTLEMENT AGREEMENT TERMS

- Green Flag Wireless, LLC (“Green Flag”) shall withdraw all competing applications and all related pleadings filed with respect to the Stratos Offshore Services Company (“Stratos”) WCS license renewal applications (the "Stratos WCS Renewal Applications") (including, without limit any request for reconsideration of the conditional grant of the Stratos WCS Renewal Applications);
- CWC License Holding, Inc., James McCotter, and NTCH-CA, Inc. (collectively, the “Other Petitioners”) shall withdraw all pleadings filed with respect to the Stratos WCS Renewal Applications (including, without limit any request for reconsideration of the conditional grant of the Stratos WCS Renewal Applications)
- Conditioned on the foregoing, neither Green Flag, the Other Petitioners, nor Stratos will file any new pleadings, applications or other documents (other than the withdrawal papers contemplated herein, and any related certifications that may be required with respect thereto) with the FCC, any court, or any other governmental authority with respect to the Stratos WCS Renewal Applications or Green Flag’s and the Other Petitioners’ pending WCS applications, or otherwise obstruct or object to pending matters concerning the others’ WCS applications;
- Green Flag and the Other Petitioners commit to complete and file all necessary papers with the FCC no later than 4:00 PM (ET) Monday, September 24, 2012 seeking the unconditional withdrawal of all competing applications and pleadings filed with respect to the Stratos WCS Renewal Applications.