

EXHIBIT 7

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
MARITIME COMMUNICATIONS/LAND MOBILE, LLC)	EB Docket No. 11-71
)	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.; 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)	Application File Nos. 0004030479, 0004144435, 0004193028, 0004193328, 0004354053, 0004309872, 0004310060, 0004314903, 0004315013, 0004430505, 0004417199, 0004419431, 0004422320, 0004422329, 0004507921, 0004153701, 0004526264, 0004636537, and 0004604962
For Commission Consent to the Assignment of Various Authorizations in the Wireless Radio Services)	

**CHOCTAW TELECOMMUNICATIONS, LLC AND CHOCTAW HOLDINGS,
LCC OBJECTIONS AND RESPONSES TO THE ENFORCEMENT BUREAU'S
FIRST SET OF INTERROGATORIES**

Choctaw Telecommunications, LLC and Choctaw Holdings, LLC (“Choctaw”), by its attorneys and pursuant to Section 1.323(b) of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ hereby object and respond to the Enforcement Bureau’s (“Bureau”) First Set of Interrogatories, dated January 18, 2013 (the “Interrogatories” and each question individually, “Interrogatory”).

¹ See 47 C.F.R. § 1.323(b).

GENERAL OBJECTIONS

1. Choctaw objects to the Interrogatories to the extent that they are overly broad and unduly burdensome given Choctaw's limited role in this hearing. The Commission designated for hearing in this proceeding issues relating to whether Maritime Communications/ Land Mobile, LLC Debtor-in-Possession ("MCLM") "is qualified to be and to remain a Commission licensee, and as a consequence thereof, whether any or all of its licenses should be revoked, and whether any or all of the applications to which Maritime is a party should be denied."² As such, Choctaw is not the subject of this hearing. Its interest in the hearing arises solely from the fact that, under MCLM's Plan of Reorganization (the "Plan"), Choctaw will acquire the right, title, and interest in the assets of MCLM, including the spectrum licenses held by MCLM (the "Licenses"), subject to approval from the Wireless Telecommunications Bureau.³

2. On January 23, 2013, Choctaw filed applications to acquire the MCLM licenses. Therein, Choctaw requested that the Commission grant relief under the Commission's *Second Thursday* doctrine.⁴ Choctaw also filed a Petition to Stay this proceeding pending action on its applications and request for *Second Thursday* relief. Choctaw intervened in this proceeding to aid "the Presiding Judge's consideration of the matter, especially as it relates to plans to pursue *Second Thursday* relief and the Plan confirmed by the Bankruptcy Court."⁵ Given Choctaw's

² *Maritime Communications/Land Mobile, LLC*, 26 FCC Rcd 6520 ¶ 1 (2012) ("HDO").

³ *In re Maritime Communications/Land Mobile, LLC*, Case No. 11-13463-DWH (N.D. Miss Bank. Ct., Nov. 15, 2012).

⁴ The Commission's long-standing *Second Thursday* doctrine is an exception from the Commission's general policy of not permitting license assignments where the license is subject to a hearing regarding its character qualifications. See *Second Thursday Corp.*, 22 FCC2d 515 (1970), *recon. granted in part*, 25 FCC2d 112 (1970).

⁵ Motion to Intervene at 2.

limited role in this hearing, requiring it to respond to the Bureau's far-reaching interrogatories would impose significant costs and burdens on Choctaw and "would be a significant distraction from the reorganization of the former MCLM."⁶ Imposing such burdens upon Choctaw would require the expenditure of significant additional funds in furtherance of issues that are more properly addressed in a different, pending proceeding and in a hearing that may ultimately be stayed. All of this runs directly counter to the Commission's policy of protecting the interests of innocent creditors that underlies the *Second Thursday* doctrine.

3. Choctaw objects to the Interrogatories to the extent that they call for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence.

4. Choctaw objects to the Interrogatories to the extent that they call for information relating to the relationship between the Choctaw Investors and Sandra and/or Donald DePriest. Such information is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. Issues relating to the relationship between the Choctaw Investors and the DePriests were not designated for hearing. To the extent that such issues are in any way material, it would be in the context of Choctaw's request for relief under *Second Thursday*. That matter is pending before the Wireless Telecommunications Bureau and is not an issue designated for hearing in this proceeding. In that regard, Choctaw already has submitted to the Wireless Telecommunications Bureau a declaration confirming that neither Sandra nor Donald DePriest have an ongoing role with Choctaw. To the extent the Wireless Telecommunications Bureau has any questions regarding the relationship between the Choctaw Investors and the DePriests, it has the necessary authority to obtain such information.

⁶ Petition for Stay at 9.

5. Choctaw objects to the Interrogatories to the extent that they call for information protected from disclosure by a legally recognized privilege and/or immunity. To the extent that such information is inadvertently produced in response to the Interrogatories, the production of such information shall not constitute a waiver of Choctaw's right to assert the applicability of any privilege or immunity to the documents.

6. All General Objections apply to each individual interrogatory without reiteration in the response thereto. Reference to a General Objection in a response is not intended to be, and shall not be deemed to be, a waiver of applicability of that or any other General Objection to any interrogatory.

7. In providing these responses, Choctaw specifically does not intend to stipulate to the admissibility of any statement or subject matter contained or referred to in any response. Rather, Choctaw expressly reserves and does not waive all available objections as to competency, relevance, materiality, privilege, and admissibility of this information for any purpose in this hearing proceeding.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

8. Choctaw objects to the Definitions and Instructions to the extent that they seek to impose obligations beyond those imposed by the FCC's rules.

9. Choctaw objects to the definition of "Document" to the extent that it requires Choctaw to provide information that (i) may be protected from disclosure by a legally recognized privilege and/or immunity; and (ii) may be confidential, including trade secrets and other competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding.

10. Choctaw objects to the definition of "Discussion" to the extent that it calls for information that (i) may be protected from disclosure by a legally recognized privilege and/or immunity; and (ii) may be confidential, including trade secrets and other competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality.

11. All Objections to Definitions and Instructions apply to each individual Interrogatory, even if not reiterated in the response thereto. Reference to the Objections to Definitions and Instructions in a response is not intended to be, and shall not be deemed to be, a waiver of applicability of that or any other Objection to Definitions and Instructions to any Interrogatory.

SPECIFIC RESPONSES AND OBJECTIONS

Interrogatory No. 1: Describe how Choctaw's participation in the above-captioned hearing proceeding will assist the Commission in the determination of the Issues set forth in *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) at ¶ 62(a)-(j).

Answer to Interrogatory No. 1: The information sought by the Interrogatory was previously provided to the Bureau in Choctaw's Motion to Intervene. As noted therein, Choctaw's interest in this proceeding was created by confirmation of the MCLM Bankruptcy Plan by the Northern District of Mississippi Bankruptcy Court (the "Bankruptcy Court") on November 15, 2012. Choctaw intervened in the hearing primarily to answer any questions regarding (i) its plans to pursue *Second Thursday* relief and (ii) the Plan confirmed by the Bankruptcy Court. Motion to Intervene at 2.

Interrogatory No. 2: Describe any due diligence that Choctaw conducted, or had conducted on its behalf, concerning whether the Site-Based Facilities were constructed in accordance with Section 80.49(a)(3) of the Commission's rules, including but not limited to site visits or inspections.

Objection to Interrogatory No. 2: Choctaw objects to this Interrogatory because it seeks information regarding site construction which is more appropriately sought from MCLM or is publicly available from the Commission's own records and databases. This Interrogatory is also unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*. Choctaw objects to this Interrogatory because it requires Choctaw to provide information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding.

Interrogatory No. 3: Describe any due diligence that Choctaw conducted, or had conducted on its behalf, concerning whether operations of any Site-Based Facilities have been discontinued, including but not limited to site visits or inspections.

Objection and Response to Interrogatory No. 3: Choctaw objects to this Interrogatory because it seeks information regarding site construction which is more appropriately sought from MCLM or is publicly available from the Commission's own records and databases. This Interrogatory is also unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*. Choctaw objects to this Interrogatory because it requires Choctaw to provide information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding.

Nevertheless, without waiving any of its objections, Choctaw notes that it did not engage in any site visits or inspections.

Interrogatory No. 4: Describe any due diligence that Choctaw conducted, or had conducted on its behalf, concerning the ongoing business operations of Maritime.

Objection and Response to Interrogatory No. 4: Choctaw objects to this Interrogatory because it seeks information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding. Choctaw also objects to the Interrogatory because it calls for information regarding site construction which is more appropriately sought from MCLM, or is publicly available from the Commission's records. This Interrogatory is unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*.

Interrogatory No. 5: For each of the Site-Based Facilities, describe any information Choctaw may have concerning whether it was constructed in accordance with Section 80.49(a)(3) of the Commission's rules, and the evidentiary basis for any such information.

Objection to Interrogatory No. 5: Choctaw objects to this Interrogatory because it seeks information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding. Choctaw also objects to the Interrogatory because it calls for information regarding site construction which is more appropriately sought from MCLM, or is publicly available from the Commission's records. This Interrogatory is unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*.

Interrogatory No. 6: For each of the Site-Based Facilities, describe any information Choctaw may have concerning whether operations have been discontinued, and the evidentiary basis for any such information.

Objection to Interrogatory No. 6: Choctaw objects to this Interrogatory because it seeks information that is confidential, including competitively sensitive business or commercial

information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding. Choctaw also objects to the Interrogatory because it calls for information regarding site construction which is more appropriately sought from MCLM, or is publicly available from the Commission's records. This Interrogatory is unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*.

Interrogatory No. 7: For each of the Site-Based Facilities, describe any information Choctaw may have concerning whether it is currently providing AMTS Service, and the evidentiary basis for any such information.

Objection and Response to Interrogatory No. 7: Choctaw is not an AMTS license and therefore is not providing service over any of MCLM's facilities. To the extent the Interrogatory was intended to seek information Choctaw may have regarding MCLM's operations, Choctaw objects because it seeks information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding. Choctaw also objects to the Interrogatory because it calls for information regarding site operation which is more appropriately sought from MCLM, or is publicly available from the Commission's records. This Interrogatory is unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*.

Interrogatory No. 8: Describe any information Choctaw may have concerning whether the Site-Based Spectrum is being used in any capacity other than for providing AMTS Service, and the evidentiary basis for any such information.

Objection to Interrogatory No. 8: Choctaw objects to this Interrogatory because it seeks

information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding. Choctaw also objects to the Interrogatory because it calls for information regarding site operations which is more appropriately sought from MCLM, or is publicly available from the Commission's records. This Interrogatory is unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*.

Interrogatory No. 9: State whether Choctaw has hired or expects to hire any current or former Maritime employees, and if so, identify the name of any such individual, their title or expected title at Choctaw, their responsibilities or expected responsibilities at Choctaw, and the reason they were hired or expect to be hired.

Objection and Reponse to Interrogatory No. 9: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. The relationship between Choctaw, which was formed after the HDO by certain MCLM creditors, and former MCLM employees is not at issue in the hearing. To the extent the Bureau is seeking information regarding the potential applicability of *Second Thursday* to the pending applications, that issue was not designated for hearing. Nevertheless, without waiving its objections, Choctaw notes that it has hired former MCLM employees John Reardon, Tim Smith, and Sharon Watkins. Information regarding these hires is set forth below:

Name:	John Reardon
Title:	Managing Director
Expected Responsibilities:	In the event that the pending applications to assign MCLM licenses to Choctaw are granted, Mr. Reardon will help manage the Company in order to pay back all creditors in accordance with the Plan of Reorganization.

Reason for Hire: Mr. Reardon will help provide continuity of operations and a historical knowledge of MCLM.

Name: Tim Smith
Title: Director of Engineering
Expected Responsibilities: In the event that the pending applications to assign MCLM licenses to Choctaw are granted, Mr. Smith will be able to assist the Company in ensuring full compliance with FCC regulations.

Reason for Hire: Mr. Smith will help provide continuity of operations and a historical knowledge of MCLM.

Name: Sharon Watkins
Title: Office Manager/Bookkeeper
Expected Responsibilities: Ms. Watkins has responsibility for managing the office and has bookkeeping responsibilities for Choctaw.

Reason for Hire: Ms. Watkins will help provide continuity of operations and a historical knowledge of MCLM.

In sum, each of the referenced individuals was hired to perform many of the same functions they performed for MCLM once (and if) the pending assignment applications are granted. Given that the secured creditors hope to maximize the value of the licenses for the creditors if the FCC grants Second Thursday relief and consents to the assignment of the licenses to Choctaw, and recognizing the reduced role that these personnel would have in MCLM while the *Second Thursday* petition was pending, Choctaw believes its interests would be well served to have these individuals working on future opportunities for its benefit if it is awarded these licenses. These hirings were disclosed as part of the proceedings before the Bankruptcy Court – proceedings in which the Commission was a party.

Interrogatory No. 10: State whether Choctaw has conducted, or has had conducted on its behalf, any valuation or appraisal of any or all authorizations licensed to Maritime including WQGF315, WQGF316, WQGF317, WQGF318 and the Site-Based Authorizations, and if so, identify any such valuation or appraisal.

Objection to Interrogatory No. 10: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the

discovery of admissible evidence. The valuation Choctaw placed on the identified licenses is irrelevant to the specific issues designated for hearing.

Interrogatory No. 11: Identify what Choctaw believes to be the present market value for the authorizations licensed to Maritime including WQGF315, WQGF316, WQGF317, WQGF318 and the Site- Based Authorizations.

Objection to Interrogatory No. 11: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. The valuation Choctaw placed on the identified licenses is irrelevant to the specific issues designated for hearing.

Interrogatory No. 12: Describe any steps that Choctaw has taken, or that have been taken on its behalf, to determine the present market value for the authorizations licensed to Maritime including WQGF315, WQGF316, WQGF317, WQGF318 and the Site-Based Authorizations.

Objection to Interrogatory No. 12: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. The valuation placed on the identified licenses by Choctaw, and the steps taken to arrive at any such valuation, is irrelevant to the specific issues designated for hearing.

Interrogatory No. 13: Describe any efforts that Choctaw has undertaken, or that have been taken on its behalf, to market the authorizations licensed to Maritime including WQGF315, WQGF316, WQGF317, WQGF318 and the Site-Based Authorizations.

Objection to Interrogatory No. 13: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. The efforts undertaken by Choctaw to value or market authorizations held by MCLM are irrelevant to the specific issues designated for hearing. Any efforts that Choctaw may have made to market the MCLM licenses were made in anticipation of the grant of some or all of the requested *Second Thursday* relief, but with full recognition that

Choctaw is not the licensee and cannot commit to any transactions until such time as the FCC has acted on its assignment applications.

Interrogatory No. 14: Describe any information Maritime provided at the time it borrowed money from any Choctaw Investor concerning the FCC licenses it intended to acquire (or had acquired), including but not limited to its business plan or strategy related to those licenses and/or any legal challenges to which they may be subject.

Objection to Interrogatory No. 14: Choctaw objects to this Interrogatory because it seeks information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. This Interrogatory is unduly burdensome given Choctaw's limited role in this proceeding. Choctaw also objects to this Interrogatory because it seeks information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding. Choctaw also objects to the Interrogatory to the extent that it calls for information which is more appropriately sought from MCLM.

Interrogatory No. 15: Describe the circumstances pursuant to which each Choctaw Investor came to loan money to Maritime, including but not limited to why the Choctaw Investor agreed to loan money to Maritime, who from Maritime approached each such Choctaw Investor, who negotiated the loan on behalf of Maritime, and the purpose of the loan.

Objection to Interrogatory No. 15: Choctaw objects to this Interrogatory because it seeks information that is neither relevant to the hearing nor reasonably calculated to lead to the discovery of admissible evidence. This Interrogatory is unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*. Choctaw also objects to this Interrogatory because it seeks information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding.

Choctaw also objects to the Interrogatory to the extent that it calls for information which is more appropriately sought from MCLM.

Interrogatory No. 16: For each Choctaw Investor, describe any understanding they had as to how Maritime intended to repay its debt.

Objection to Interrogatory No. 16: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the hearing nor reasonably calculated to lead to the discovery of admissible evidence. Communications between Choctaw Investors and MCLM regarding loan arrangements are irrelevant for purposes of the issues designated for hearing. Choctaw also objects to the Interrogatory because it is unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*. Choctaw objects to this Interrogatory because it seeks information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding.

Interrogatory No. 17: Identify the date on which Choctaw Telecommunications, LLC was formed and explain why it was formed.

Objection and Response to Interrogatory No. 17: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding the formation of Choctaw is irrelevant for purposes of the issues designated for hearing. Information regarding the formation of Choctaw Telecommunications, LLC is publicly available from the Secretary of State of Alabama. Nevertheless, without waiving its objections, Choctaw states that the Articles of Organization of Choctaw Telecommunications, LLC were filed on January 17, 2012 in the Probate Court of Jefferson County, Alabama and with the Secretary of State of Alabama. Choctaw Telecommunications, LLC was formed by certain Secured and Unsecured creditors in

the Maritime Communications/Land Mobile, LLC Bankruptcy proceeding as a vehicle to assume the assets under a plan of Reorganization approved by the Bankruptcy Court.

Interrogatory No. 18: Identify the date on which Choctaw Holdings, LLC was formed and explain why it was formed.

Objection and Response to Interrogatory No. 18: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding the formation of Choctaw is irrelevant for purposes of the issues designated for hearing. Information regarding the formation of Choctaw Holdings, LLC is publicly available from the Secretary of State of Alabama. Nevertheless, without waiving its objections, Choctaw states that the Articles of Organization of Choctaw Holdings, LLC were filed on January 17, 2012 in the Probate Court of Jefferson County, Alabama and with the Secretary of State of Alabama. Choctaw Holdings, LLC was formed to hold any licensed assets of Choctaw Telecommunications, LLC.

Interrogatory No. 19: Identify the officers, directors, shareholders or members of Choctaw Telecommunications, LLC.

Objection and Response to Interrogatory No. 19: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding the formation of Choctaw is irrelevant for purposes of the issues designated for hearing. Nevertheless, without waiving its objections, Choctaw states that the officers, directors, shareholders or members of Choctaw Telecommunications, LLC are as follows:

Collateral Plus Fund I, LP 102 Woodmont Boulevard Nashville, TN 37205 615.292.7001	Member
Robert H. Hollis, III 116 Loftin Road	Member

Dothan, AL 36303
334.793.4444

Patrick B. Trammell
1500 1st Avenue North
Birmingham, AL 35203
205.250.8026

Managing Member

Watson and Downs Investments, LLC Member
488 Ross Clark Circle
Dothan, AL 36303
334.794.6721

Interrogatory No. 20: Identify the officers, directors, shareholders or members of Choctaw Holdings, LLC.

Objection and Response to Interrogatory No. 20: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the hearing nor reasonably calculated to lead to the discovery of admissible evidence. Information regarding the formation of Choctaw is irrelevant for purposes of the issues designated for hearing. Nevertheless, without waiving its objections, Choctaw states that the sole member of Choctaw Holdings, LLC is Choctaw Telecommunications, LLC.

Interrogatory No. 21: For each Choctaw Investor, describe any relationship (whether business or personal) between that Choctaw Investor and Sandra DePriest that existed before the date it loaned the money to Maritime or any time thereafter through the present.

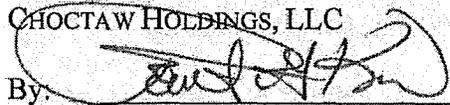
Objection to Interrogatory No. 21: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. Communications between the Choctaw Investors and Ms. DePriest regarding loan arrangements are irrelevant for purposes of the issues designated for hearing. Choctaw objects to this Interrogatory because it seeks information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope

of Choctaw's participation in this proceeding. This Interrogatory is unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*.

Interrogatory No. 22: For each Choctaw Investor, describe any relationship (whether business or personal) between that Choctaw Investor and Donald DePriest that existed before the date it loaned the money to Maritime or any time thereafter through the present.

Objection to Interrogatory No. 22: Choctaw objects to this Interrogatory because it calls for information that is neither relevant to the present hearing nor reasonably calculated to lead to the discovery of admissible evidence. Communications between Choctaw Investors and Mr. DePriest regarding loan arrangements are irrelevant for purposes of the issues designated for hearing. Choctaw objects to this Interrogatory because it seeks information that is confidential, including competitively sensitive business or commercial information, the probative value of which is outweighed by Choctaw's interest in preserving its confidentiality and the limited scope of Choctaw's participation in this proceeding. Choctaw also objects to the Interrogatory because it is unduly burdensome given the limited scope of Choctaw's participation in this proceeding, the pending Petition for Stay, and the pending request for relief under *Second Thursday*.

Respectfully submitted,
CHOCTAW TELECOMMUNICATIONS, LLC
CHOCTAW HOLDINGS, LLC

By: 

Robert G. Kirk
J. Wade Lindsay
Mary N. O'Connor

WILKINSON BARKER KNAUER, LLP
2300 N Street, N.W., Suite 700
Washington, D.C. 20037
(202) 783-4141

Their Attorneys

January 28, 2013

CERTIFICATE OF SERVICE

I, Paula Lewis, do hereby certify that on this 28th day of January 2013, the foregoing Choctaw Telecommunications, LLC and Choctaw Holdings, LCC Objections and Responses to the Enforcement Bureau's First Set of Interrogatories was served by email and first class mail, postage prepaid, on the following persons:

The Honorable Richard L. Sippel * Chief Administrative Law Judge Federal Communications Commission 445 12th Street, S.W., Room 1-C768 Washington, DC 20554	Sandra DePriest Maritime Communications/Land Mobile LLC 218 North Lee Street Suite 318 Alexandria, Virginia 22314
Pamela A. Kane * Brian Carter Investigations and Hearing Division Enforcement Bureau Federal Communications Commission 445 12 th Street, S.W., Room 4-C3350 Washington, DC 20554	Jeffrey L. Sheldon Levine, Blaszak, Block & Boothby, LLP 2001 L Street, NW, Suite 900 Washington, DC 20036 Counsel for Puget Sound Energy, Inc.
Dennis C. Brown 8124 Cooke Court Suite 201 Manassas, VA 20109 Counsel for Maritime Communications/Land Mobile LLC	Charles A. Zdebski Gerit F. Hull Eckert Seamans Cherin & Mellott, LLC 1717 Pennsylvania Avenue, N.W. Washington, D.C. 20006 Counsel for Duquesne Light Co.
Jack Richards Wesley Wright Keller & Heckman LLP 1001 G Street, N.W. Suite 500 West Washington, D.C. 20001 Counsel for Atlas Pipeline – Mid Continent LLC; DCP Midstream, LP; Enbridge Energy Co., Inc.; EnCana Oil and Gas (USA), Inc.; and Jackson	Matthew J. Plache Albert J. Catalano Catalano & Plache, PLLC 3221 M Street, N.W. Washington, D.C. 20007 Counsel for Dixie Electric Membership Corp. Counsel for Pinnacle Wireless Corp.

<p>Paul J. Feldman Harry F. Cole Fletcher, Heald & Hildreth, P.L.C. 1300 N. 17th Street – 11th Floor Arlington, VA 22209 Counsel for Southern California Regional Rail Authority</p>	<p>James Ming Chen The Havener Law Firm, LLC 2904 Beaumont Road Louisville, KY 40205 Counsel for Warren Havens and SkyTel</p>
<p>Robert J. Keller Law Offices of Robert J. Keller, P.C. P.O. Box 33428 Washington, D.C. 20033 Counsel for Maritime Communications/Land Mobile LLC</p>	



Paula Lewis

* Also served by hand delivery.