

Exhibit 2								
Filer Name	Title of Document	Date Filed with FCC	Docket No.	Assignment Application File No.	Public Interest Statement to Assignment Application: Did or Did Not Assert AMTS is Only Spectrum Option	Language in each CII entitie's Public Interest Statement is different from each one's assertion in docket 13-85, as to why it should get Footnote 7 type relief now. See cites below in quotes from their Public Interest Statements. No mention of being so critical that assignee needs extraordinary relief to obtain the spectrum and that AMTS is only solution.	Footnote 7 relief requested. Yes or No.	Footnote 7 Language in document (Cites)
Southern California Regional Rail Authority	13-85 05-30-2013 Southern California Regional Rail Authority 7022419440. RESPONSE OF SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY	05/30/2013	13-85				Yes	Page 2. 3. ...But despite their seeming aversion to granting Second Thursday relief here, both the Enforcement Bureau ("Bureau") and Council Tree Investors, Inc. ("Council Tree") appear to endorse prompt and favorable action on the SCRRA Applications pursuant to the "Footnote 7" approach referenced in Footnote 7 to the Hearing... Page 3. As SCRRA pointed out in its initial comments in response to the Public Notice, one factor of overriding public interest importance is the need to promote safety-of-life considerations. The Communications Act itself specifically directs the Commission to "promot[e] safety of life and property". 47 U.S.C. §151. In the instant case, grant of the above- captioned applications – and particularly the applications (and related waiver requests) to which SCRRA is a party – will unquestionably advance precisely such considerations, as Congress itself has recognized in mandating the deployment of spectrum-based Positive Train Control technology.
Southern California Regional Rail Authority	13-85 05-09-2013 Southern California Regional Rail Authority 7022311050. COMMENTS OF SOUTHERN CALIFORNIA REGIONAL-RAIL AUTHORITY	05/09/2013	13-85				Yes	Page 16: WHEREFORE, for the reasons stated, Southern California Regional Rail Authority hereby urges the Commission to immediately take such action as may be necessary to grant the SCRRA Applications, whether pursuant to Second Thursday or Footnote 7.
Southern California Regional Rail Authority	Form 603 Assignment Application between SCRRA and MCLM	3/11/10		0004144435	Did (but not true, see e.g. Skytel reply and Haven's reply in docket 13-85, and their Exhibits 1.1 and 1.2, and also other SkyTel entities' filings in dockets 10-83, 11-71 and 11-79)		No	
Maritime Communications/Land Mobile, LLC, Debtor-in-Possession	13-85 05-30-2013 Maritime Communications Land Mobile, LLC, Debtor-in-Possession 7022419606. REPLY COMMENTS AND OPPOSITION TO PETITIONS	05/30/2013	13-85					No reference to Footnote 7 of HDO.
Choctaw	13-85 05-30-2013 Choctaw 7022419542. REPLY COMMENTS AND OPPOSITION TO PETITIONS. TO DENY	05/31/2013	13-85	No			Yes	Page 33. PENDING APPLICATIONS SHOULD BE GRANTED EXPEDITIOUSLY PURSUANT TO FOOTNOTE 7 OF THE HDO
CII Companies	13-85 05-30-2013 CII Companies 7022419423. REPLY COMMENTS OF CRITICAL INFRASTRUCTURE COMPANIES	05/30/2013	13-85				Yes.	See page 5, Section III. Grant their petitions for reconsideration that requested similar relief as footnote 7.
CII Companies	13-85 05-09-2013 CII Companies 7022311033. COMMENTS OF CRITICAL INFRASTRUCTURE COMPANIES	05/09/2013	13-85				Yes.	See page 14, Section III.C. regarding grant of their pending petitions for reconsideration that requested similar relief as footnote 7.
Shenandoah Valley Electric Cooperative	13-85 05-09-2013 Shenandoah Valley Electric Cooperative 7022311014. COMMENTS OF SHENANDOAH VALLEY ELECTRIC COOPERATIVE	05/09/2013	13-85				No	None

Enbridge Energy Company, Inc.	Form 603 Assignment Application between Filer and MCLM	8/30/11		0004610535	Did Not	Yes, different. E.g. "The spectrum which Enbridge will acquire will be used to increase the safety and efficiency of its operations in the State of Texas."	No
Dixie Electric Membership Corporation, Inc.	Form 603 Assignment Application between Filer and MCLM	12/8/10		0004507921	Did Not	Yes, different. E.g. "To maintain and improve the reliability of its service and to accommodate new services, such as SmartGrid, DEMCO requires additional radio facilities. DEMCO has agreed to acquire the necessary FCC authority from Maritime Communications/Land Mobile, LLC (MCLM)."	No
EnCana Oil & Gas (USA), Inc.	Form 603 Assignment Application between Filer and MCLM	6/10/09		0003388394	Did Not	Yes, different. E.g. "EnCana believes that its lease of a subset of the AMTS frequencies in the Ft. Worth and East Texas areas from MCLM, LLC will further the public interest by placing this spectrum in use to support these critical energy-producing operations."	No
Duquesne Light Company	Form 603 Assignment Application between Filer and MCLM	4/21/10		0004193328	Did Not	Yes, different. E.g. "To protect the safety of the lives of its personnel and to protect the safety of property of inestimable value, DLC requires improved radio communications. Experience has shown that only radio spectrum in the VHF range, such as AMTS, can provide communications which are adequate to support DLC's operation in the rural area."	No
Jackson County Rural Membership Electric Cooperative	Form 603 Assignment Application between Filer and MCLM	8/9/10		0004310060	Did Not	Yes, different. E.g. "Jackson requires additional spectrum to improve the efficiency of its operations and to accommodate an increasing demand for its services. Accordingly, acceptance of the instant notification will be in the public interest."	No
Atlas Pipeline - Mid Continent LLC	Form 603 Assignment Application between Filer and MCLM	3/2/2011, amended 4/18/2012		0004526264	Did Not	Yes, different. E.g. "To maintain and improve the reliability of its service and to accommodate new services, Atlas requires additional SCADA radio facilities. Atlas has agreed to acquire the necessary FCC authority from Maritime Communications/Land Mobile, LLC (MCLM) and has filed application file number 0004526264 for consent to the acquisition." and "Natural gas is an increasingly essential energy resource. Atlas's pipeline service is an essential element of America's energy future. The efficiency and safety of Atlas's critical infrastructure industry requires the improved data communications capacity which this spectrum will provide."	No

**DESCRIPTION OF TRANSACTION
AND PUBLIC INTEREST STATEMENT**

Maritime Communications/Land Mobile, LLC (“MC/LM”) and Southern California Regional Rail Authority (“SCRRA”), hereby seek Commission consent to geographically partition a portion of the license area covered by AMTS Station WGQF318 (the “Partitioned License”) and assign that Partitioned License from MC/LM to SCRRA.

SCRRA is a joint powers governmental agency formed to develop a regional transit service to reduce the congestion on highways and improve mobility throughout the Southern California region. It operates the Metrolink railroad service, providing the people of Southern California a safe, reliable and environmentally friendly commute option. Currently, Metrolink operates seven separate train lines serving 55 train stations, and has 512 operating route miles (including shared miles) of track. On an average weekday, Metrolink serves over 40,000 riders, and runs 149 trains.

Through this application and associated filings, MC/LM and SCRRA are requesting:

1. The assignment from MC/LM to SCRRA of a partitioned geographical portion of MC/LM’s AMTS Pacific A-Block license. The geographical portion to be assigned to SCRRA covers the entirety of six counties in Southern California that coincide with Metrolink’s service area. The geographic area is defined by county borders, in accordance with applicable FCC rules.
2. The modification of the Partitioned License as requested by MC/LM in a Form 601 application being filed concurrently with this assignment application. The modification application seeks, pursuant to Section 20.9(b)(1) of the Commission’s rules, to convert the Partitioned License to private mobile radio service. It is respectfully requested that the Commission grant MC/LM’s Form 601 application prior to, or simultaneously with, this assignment application, so that the proposed modification may be executed simultaneously with the assignment of the Partitioned License.
3. A waiver of certain rules in Part 80 to permit SCRRA to use the spectrum in a manner consistent with the requirements of positive train control (“PTC”). The specific waivers requested and the reasons why grant of such waivers is in the public interest are set out in an attachment to this assignment application.

Subsequent to the grant of MC/LM’s Form 601 modification application and this application, but prior to consummation of the underlying transaction, MC/LM will submit a Form 601 to seek

cancellation of its incumbent, site-based AMTS license (KAE889). This will result in the elimination of any interference issues under Section 80.385(b)(1) of the Commission's rules.

A grant of this assignment application and the associated filings would serve the public interest by facilitating public safety in the operation of rail traffic in Southern California, by providing spectrum necessary for SCRRA to use PTC in connection with its Metrolink train service. Public safety is the primary concern for any operator of a train system, and robust, reliable, advanced telecommunications is a critical tool for insuring safe operations. Congress recognized this when it enacted the Rail Safety Improvement Act of 2008 (the "Safety Act"), which mandates development and implementation of PTC on "Class I" railroads by December 31, 2015.¹ PTC systems use radio frequencies to monitor train activity, prevent train collisions and worker injuries, and enhance public safety. Information is transmitted regarding that train's location and related route data, along with additional information regarding where the train may travel safely. The integrated onboard system then automatically monitors the train's speed and location with respect to the train's area authorized for travel, also known as "authority." Positive train control systems will manage track congestion and improve safety, in part by supervising and enforcing "movement authorities" and speed limits. They will also continuously monitor and report train diagnostics, issue alarms (*e.g.*, broken rails, incorrect switch alignments), and monitor radio transmissions from "wayside" systems, among other functions.

SCRRA is subject to the PTC mandate, and it is aggressively pursuing an implementation strategy to meet an earlier deadline of 2012. However, that federal mandate also requires PTC systems to be interoperable with other railroad carriers. In order to achieve that interoperability, SCRRA must use spectrum that facilitates shared operations with other major rail operators in Southern California -- Union Pacific and BNSF -- with whom Metrolink shares tracks. Both Union Pacific and BNSF are members of the PTC-220 consortium,² and thus they will use 220 MHz spectrum on their PTC systems with which Metrolink's PTC system must interoperate. However, Union Pacific and BNSF have informed Metrolink that there will not be sufficient capacity on the PTC-220 spectrum in Southern California to accommodate Metrolink's operations. It is therefore necessary for SCRRA to obtain enough suitable spectrum in the working range of the 220 MHz band in order to implement an interoperable PTC system as required. SCRRA has conducted extensive spectrum research and has engaged engineers and other technical consultants in order to identify appropriate frequencies on which to deploy its PTC system, and the only viable option was to purchase a partitioned portion of an existing

¹ See Rail Safety Improvement Act of 2008, Pub. L. No. 110-432, 122 Stat. 4848 (2008).

² PTC-220, LLC is the licensee for a number of nationwide and regional licenses in the 220 MHz band, to be used for PTC operations.

AMTS geographic-area license.³

Grant of this assignment application will also advance the Commission's spectrum efficiency and flexible use goals, as well as encourage intensive use of the AMTS spectrum. In streamlining AMTS service rules, the Commission noted that the rule changes would "promote more efficient use of maritime spectrum...."⁴ When it afforded AMTS licensees with additional operational flexibility to provide service to units on land in 2007, the Commission also stated that its actions would "facilitate more efficient use of VPC and AMTS spectrum; and provide an additional means to meet growing demand for spectrum by PLMR licensees and end users, including public safety and critical infrastructure industry (CII) entities."⁵

SCRRA recognizes that the original purpose of the AMTS spectrum was to provide service to maritime users. However, repurposing this limited amount of spectrum to non-maritime use will not harm maritime users in Southern California, since, as demonstrated in the Waiver Request attached to this assignment application, there are many other maritime licensees operating in that area that can serve them.

For the reasons set forth above, grant of the proposed assignment and partition would serve the public interest and necessity.

³ V/ETMS, the version of PTC that Metrolink must implement in order to interoperate with Union Pacific and Burlington Northern Santa Fe railroads, requires a block of several hundred megahertz of spectrum within this range in the railroad's operating territory. The only services within 217-222 MHz known to have enough spectrum available to support this need are AMTS, IVDS, and the 220 MHz band (with the license held by PTC-220 LLC). PTC-220 LLC will only have enough spectrum to meet their own needs in congested areas such as Los Angeles, where a large number of freight trains operate. Thus, PTC-220 will not have enough excess spectrum to also support a high density commuter operation such as Metrolink. IVDS has more stringent (4 Watt) mobile transmit power limitations than AMTS, and furthermore, IVDS spectrum in the Los Angeles area does not appear to be available for sale at the time. Accordingly, grant of this application will not only serve the public interest, it will also serve the public "necessity", as stated in Section 310(d) of the Communications Act.

⁴ *Amendment of the Commission's Rules Concerning Maritime Communications*, Second Memorandum Opinion and Order and Fifth Report and Order, 17 FCC Red 6685 (2002) at para. 2.

⁵ *MariTEL, Inc. and Mobex Network Services, LLC Petitions for Rule Making to Amend the Commission's Rules to Provide Additional Flexibility for AMTS And VHF Public Coast Station Licensees*, Report and Order, 22 FCC Red 8971 (2007) at para. 1.

NEXT DOCUMENT

Public Interest Statement

EnCana Oil and Gas (USA), Inc. (“EnCana”) operations are focused on exploiting long-life unconventional natural gas formations in the Jonah field in southwest Wyoming, the Piceance Basin in northwest Colorado and the East Texas, Fort Worth and Maverick Basins in Texas. The majority of the production in the United States division is from the four key resource plays at Jonah, Piceance, East Texas and Fort Worth. Together, these four key resource areas accounted for approximately 87 percent of the total U.S. natural gas production in 2007. In 2007, EnCana's U.S. natural gas production averaged 1,345 million cubic feet per day (MMcf/d).

EnCana believes that its lease of a subset of the AMTS frequencies in the Ft. Worth and East Texas areas from MCLM, LLC will further the public interest by placing this spectrum in use to support these critical energy-producing operations.

NEXT DOCUMENT

PUBLIC INTEREST STATEMENT

Jackson County REMC (Jackson) is a member-owned rural electric cooperative. Jackson serves some 20,000 members over more than 2800 miles of line, including service to good farming areas as well as to hilly areas of southern Indiana. Jackson requires additional spectrum to improve the efficiency of its operations and to accommodate an increasing demand for its services. Accordingly, acceptance of the instant notification will be in the public interest.

NEXT DOCUMENT

Public Interest Statement

Dixie Electric Membership Corporation (DEMCO) supplies reliable electric service to over 97,000 locations throughout the Ascension, East Baton Rouge, East Feliciana, Livingston, St. Helena, Tangipahoa, and West Feliciana parishes of Louisiana. To maintain and improve the reliability of its service and to accommodate new services, such as SmartGrid, DEMCO requires additional radio facilities. DEMCO has agreed to acquire the necessary FCC authority from Maritime Communications/Land Mobile, LLC (MCLM).

Service to the consumers of DEMCO begins with a modern system of transmission and distribution facilities with the capacity and reliability to turn the wheels of the largest industrial user. The system includes eight metering points for wholesale power and 34 substations for system reliability. The electrical system is continually monitored by a Supervisory Control and Data Acquisition system (SCADA) to detect system failures. In 2009, DEMCO maintained over 9,533 miles of energized lines: 227 miles of transmission facilities, 6,574 miles of overhead construction and 2,732 miles of underground cable.

The public interest will be well served by grant of MCLM's application which will allow DEMCO to meet the needs of its nearly 100 thousand users which rely on uninterrupted electric power service.

NEXT DOCUMENT

PUBLIC INTEREST STATEMENT

Enbridge, Inc. (Enbridge) transports energy, operating the world's longest, most sophisticated crude oil and liquids transportation system. Enbridge has a growing involvement in the natural gas transmission and midstream businesses, and is expanding its interests in renewable and green energy technologies including wind and solar energy, hybrid fuel cells and carbon dioxide sequestration. The spectrum which Enbridge will acquire will be used to increase the safety and efficiency of its operations in the State of Texas. Accordingly, grant of the instant application will be in the public interest.

NEXT DOCUMENT

Public Interest Statement

Atlas Pipeline Mid-Continent LLC (Atlas) gathers and processes natural gas over a pipeline network of more than two thousand miles. To maintain and improve the reliability of its service and to accommodate new services, Atlas requires additional SCADA radio facilities. Atlas has agreed to acquire the necessary FCC authority from Maritime Communications/Land Mobile, LLC (MCLM) and has filed application file number 0004526264 for consent to the acquisition. In the interim, Atlas will operate under a lease from MCLM.

Natural gas is an increasingly essential energy resource. Atlas's pipeline service is an essential element of America's energy future. The efficiency and safety of Atlas's critical infrastructure industry requires the improved data communications capacity which this spectrum will provide.

The public interest will be well served by acceptance of the instant notification.

NEXT DOCUMENT

PUBLIC INTEREST STATEMENT

Maritime Communications/Land Mobile, LLC (MCLM) and Duquesne Light Company (DLC) hereby explain why grant of the instant application for disaggregation of spectrum from AMTS station WHG750 is in the public interest.

DLC is a public utility engaged in the transmission and distribution of electric energy to more than one half million customers in southwestern Pennsylvania. DLC is prepared to undertake a substantial capital improvement of its facilities in a deeply rural portion of its service area. To protect the safety of the lives of its personnel and to protect the safety of property of inestimable value, DLC requires improved radio communications. Experience has shown that only radio spectrum in the VHF range, such as AMTS, can provide communications which are adequate to support DLC's operation in the rural area. For all these reasons, MCLM and DLC respectfully submit that grant of the instant disaggregation application will be in the public interest.