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September 17, 2013

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Verizon Petition for Declaratory Ruling, Docket No. ISP-PDR-20130906-00005**

Dear Ms. Dortch,

Enclosed please find additional information in connection with Verizon's September 6, 2013, Petition for Declaratory Ruling (the "Petition").

Exhibit 1 contains a list of those entities identified in Appendix A to the Petition that hold common carrier licenses and their associated FRNs and for which Verizon seeks the declaratory ruling. For purposes of this Petition, please use my contact information as the point of contact for each of the entities in Appendix A.<sup>1</sup>

Exhibits 2 and 3 contain additional organizational charts relating to Verizon Communications Inc. and to the entities identified in Appendix A to the Petition. For the purposes of completeness, these charts may include additional entities not included in the list in Exhibit 1.

Charts 1 and 2 of Exhibit 2 identify the Cellco ownership chain. This chain shows the existing 55 percent interest in Cellco that is currently and will post-transaction continue to be held by Verizon Communications as well as the 45 percent interest in Cellco that Verizon

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<sup>1</sup> The Petition was filed pursuant to 47 U.S.C. § 310(b)(4) of the Communications Act of 1934 on behalf of the post-transaction Verizon Communications Inc. subsidiary licensees holding common carrier radio licenses. Upon reviewing the Verizon subsidiaries, we have not identified any that would require forbearance under 47 U.S.C. § 310(b)(3). However, to the extent the Commission believes that 47 U.S.C. § 310(b)(3) is also applicable to certain licensees, Verizon asks that it be granted forbearance from the provisions of section 310(b)(3) in accordance with the Commission's foreign ownership forbearance order. *See In the Matter of Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licensees under section 310(b)(4) of the Communications Act of 1934, as Amended*, First Report and Order, FCC 12-93 (Rel. Aug. 17, 2012).

Communications is acquiring. The charts also show the intermediate entities for each ownership stream. Chart 3 of Exhibit 2 shows the ownership for those Appendix A entities which have been, and post-transaction will continue to be, directly or indirectly owned by Verizon Communications Inc. (the “Pre-existing Verizon Licensees”).

Exhibit 3 shows the organizational charts for Cellco subsidiaries and affiliate entities in which Vodafone pre-transaction has an ownership interest that will be transferred to Verizon Communications Inc. pursuant to the transaction (“Pre-existing Cellco Licensees”).<sup>2</sup>

Please contact me if you need any additional information.

Very truly yours,

A handwritten signature in black ink that reads "Katharine Saunders". The signature is written in a cursive, flowing style.

Katharine R. Saunders

cc: Troy Tanner  
Francis Gutierrez  
Susan O'Connell

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<sup>2</sup> Additionally, there are three subsidiary licensees in which Alltel's voting rights were placed into trust following the Alltel transaction; Verizon is not currently seeking removal of that trust. See Applications of Atlantic Holdings LLC and Cellco Partnership d/b/a Verizon Wireless for Transfer of Control, *Memorandum Opinion and Order and Declaratory Ruling*, 23 FCC Rcd. 17444, 17545-46 (2008).

Company Name	FRN
AirTouch Cellular	0006146468
Allentown SMSA Limited Partnership	0003299781
Alltel Central Arkansas Cellular Limited Partnership	0001722008
Alltel Communications Investments, Inc.	0007935307
ALLTEL COMMUNICATIONS OF ARKANSAS RSA #12 CELLULAR LIMITED PARTNERSHIP	0003803004
ALLTEL COMMUNICATIONS OF LACROSSE LIMITED PARTNERSHIP	0004549143
ALLTEL COMMUNICATIONS OF MISSISSIPPI RSA #2, INC.	0004548020
Alltel Communications of Nebraska, Inc.	0002377869
ALLTEL COMMUNICATIONS OF NORTH CAROLINA LIMITED PARTNERSHIP	0001773001
Alltel Communications of Petersburg, Inc.	0020537171
ALLTEL COMMUNICATIONS OF SAGINAW MSA L.P.	0004251179
Alltel Communications Southwest Holdings, Inc.	0020537163
Alltel Communications Wireless of Louisiana, Inc.	0018794966
Alltel Communications Wireless, Inc.	0020532149
Alltel Communications, LLC	0018437624
ALLTEL NORTHERN ARKANSAS RSA LIMITED PARTNERSHIP	0001721083
Alltel Telelink, Inc.	0003803020
Anderson CellTelCo	0004268926
APPLETON OSHKOSH NEENAH MSA, LP	0004152963
ARKANSAS RSA #2 (SEARCY COUNTY) CELLULAR LIMITED PARTNERSHIP	0004989638
Athens Cellular, Inc.	0001545474
Bell Atlantic Mobile of Asheville, Inc.	0003595105
Bell Atlantic Mobile of Rochester, LP	0003402666
BELL ATLANTIC MOBILE SYSTEMS OF ALLENTOWN, INC.	0003301512
Binghamton MSA Limited Partnership	0001840230
Bismarck MSA Limited Partnership	0001606532
California RSA No. 4 Limited Partnership	0001838671
Cellco Partnership	0003290673
Cellular Inc. Network Corporation	0001607795
Cellular, Inc. Financial Corporation	0010354843
CHARLESTON-NORTH CHARLESTON MSA LIMITED PARTNERSHIP	0002531291
Chicago SMSA LP	0002846962
Colorado RSA No. 3 Limited Partnership	0001572403
Dallas MTA, LP	0001658970
Danville Cellular Telephone Company Limited Partnership	0003594868
Dubuque MSA Limited Partnership	0002842599
Duluth MSA Limited Partnership	0001574425
FAYETTEVILLE MSA LIMITED PARTNERSHIP	0001840255
Fresno MSA Limited Partnership	0001842954
Gadsden CellTelCo Partnership	0001573039
Gila River Cellular General Partnership	0001607183
Gold Creek Cellular of Montana Limited Partnership	0001627702
GTE Mobilnet of California Limited Partnership	0003579380
GTE Mobilnet of Florence, Alabama Incorporated	0001573518
GTE Mobilnet of Fort Wayne Limited Partnership	0003577608
GTE Mobilnet of Indiana Limited Partnership	0003579364
GTE Mobilnet of Indiana RSA #3 Limited Partnership	0001640697
GTE Mobilnet of Indiana RSA #6 Limited Partnership	0001640705
GTE Mobilnet of Santa Barbara Limited Partnership	0003577624
GTE Mobilnet of South Texas Limited Partnership	0003579406
GTE Mobilnet of Terre Haute Limited Partnership	0003577582
GTE Mobilnet of Texas RSA #17 Limited Partnership	0003293941
GTE Southwest Incorporated (d/b/a Verizon Southwest)	0001680263
GTE Wireless of the Midwest Incorporated	0003578580
Idaho 6-Clark Limited Partnership	0001607886

Company Name	FRN
Idaho RSA 3 Limited Partnership	0001837137
Idaho RSA No. 2 Limited Partnership	0001572346
Illinois RSA 1 Limited Partnership	0001837111
Illinois RSA 6 and 7 Limited Partnership	0002842334
Illinois SMSA Limited Partnership	0002840718
Indiana RSA #1 Limited Partnership	0003293966
Indiana RSA 2 Partnership	0002837078
Iowa 8-Monona Limited Partnership	0001608009
Iowa RSA 10 LLC	0020567178
Iowa RSA 5 Limited Partnership	0001837301
Iowa RSA No. 4 Limited Partnership	0001837285
JACKSON CELLULAR TELEPHONE CO. INC.	0003985371
Kentucky RSA No. 1 Partnership	0001836709
Lafayette Cellular Telephone Company	0001545771
Los Angeles SMSA Limited Partnership	0002963817
MCI Communications Services, Inc. (d/b/a Verizon Business Services)	0004335592
MCImetro Access Transmission Services LLC (d/b/a Verizon Access Transmission Services)	0004999405
MICHIGAN RSA #9 LIMITED PARTNERSHIP	0001712918
MIDWEST WIRELESS COMMUNICATIONS, L.L.C.	0018437947
MIDWEST WIRELESS IOWA L.L.C.	0018437905
MIDWEST WIRELESS WISCONSIN L.L.C.	0002622041
Missouri RSA 2 Limited Partnership	0019468784
Missouri RSA 4 Limited Partnership	0019468800
MISSOURI RSA NO. 15 LIMITED PARTNERSHIP	0002533610
Modoc RSA Limited Partnership	0002967776
MOHAVE CELLULAR LIMITED PARTNERSHIP	0005010590
Muskegon Cellular Partnership	0005412259
MVI CORP.	0001580547
New Hampshire RSA 2 Partnership	0003299922
New Mexico RSA 3 Limited Partnership	0001838697
New Mexico RSA 6-I Partnership	0001838655
New Mexico RSA No. 5 Limited Partnership	0001838713
New Par	0003010816
New York RSA 2 Cellular Partnership	0001836584
New York RSA No. 3 Cellular Partnership	0003398716
New York SMSA Limited Partnership	0003473220
North Central RSA 2 of North Dakota Limited Partnership	0001608280
North Dakota 5-Kidder Limited Partnership	0001607985
North Dakota RSA No. 3 Limited Partnership	0001572429
Northeast Pennsylvania SMSA Limited Partnership	0003250123
Northern New Mexico Limited Partnership	0001604966
NORTHWEST ARKANSAS RSA LIMITED PARTNERSHIP	0001837178
Northwest Dakota Cellular of North Dakota Limited Partnership	0001608306
NYNEX Mobile Limited Partnership 1	0005005525
NYNEX Mobile Limited Partnership 2	0003300795
NYNEX Mobile of New York, LP	0001840214
OKLAHOMA RSA NO. 4 SOUTH PARTNERSHIP	0001720127
Omaha Cellular Telephone Company	0005005533
Orange County-Poughkeepsie Limited Partnership	0003300811
PASCAGOULA CELLULAR PARTNERSHIP	0004524211
Pennsylvania 3 Sector 2 Limited Partnership	0002147551
Pennsylvania 4 Sector 2 Limited Partnership	0002147494
Pennsylvania RSA 1 Limited Partnership	0002837151
Pennsylvania RSA No. 6 (I) Limited Partnership	0004821765
Pennsylvania RSA No. 6 (II) Limited Partnership	0003290350

Company Name	FRN
PETERSBURG CELLULAR PARTNERSHIP	0004516381
Pittsburgh SMSA Limited Partnership	0003290335
Pittsfield Cellular Telephone Company	0003290418
Portland Cellular Partnership	0003682887
RCC Minnesota, Inc.	0018087619
RCTC WHOLESALE CORPORATION	0001746957
Redding MSA Limited Partnership	0001723964
Rockford MSA Limited Partnership	0001840537
RSA 7 Limited Partnership	0001572445
RURAL CELLULAR CORPORATION	0003715919
Sacramento Valley Limited Partnership	0002972149
San Antonio MTA, L.P.	0001658962
Seattle SMSA Limited Partnership	0001581305
Sioux City MSA Limited Partnership	0001609411
Southern Indiana RSA Limited Partnership	0001837269
Southwestco Wireless LP	0003290525
Springfield Cellular Telephone Company	0003012515
St. Joseph CellTelCo	0005005541
St. Lawrence Seaway RSA Cellular Partnership	0003477916
Syracuse SMSA Limited Partnership	0003472230
TEXAS RSA 11B LIMITED PARTNERSHIP	0004175246
TEXAS RSA 7B2 LIMITED PARTNERSHIP	0002837037
Topeka Cellular Telephone Company, Inc.	0005068713
Tuscaloosa Cellular Partnership	0001573104
TYLER/LONGVIEW/MARSHALL MSA LIMITED PARTNERSHIP	0002845253
Upstate Cellular Network	0003407764
Verizon California Inc.	0001536424
Verizon Delaware LLC	0003271798
Verizon Florida LLC	0001824804
Verizon Maryland LLC	0002166825
Verizon New England Inc.	0003628971
Verizon New Jersey Inc.	0003316692
Verizon New York Inc.	0003469442
Verizon North LLC	0020249777
Verizon Pennsylvania LLC	0003273505
Verizon Virginia LLC	0002073203
Verizon Washington, DC Inc.	0002109213
Verizon Wireless (VAW) LLC	0003800307
Verizon Wireless of the East LP	0007609324
Verizon Wireless Personal Communications LP	0001659069
Verizon Wireless Telecom Inc.	0005798061
Verizon Wireless Tennessee Partnership	0006209373
Verizon Wireless Texas LLC	0004447371
Vermont RSA Limited Partnership	0005391651
Virginia 10 RSA Limited Partnership	0002056943
VIRGINIA RSA 2 LIMITED PARTNERSHIP	0006147607
Virginia RSA 5 Limited Partnership	0001837210
Wasatch Utah RSA No. 2 Limited Partnership	0001572387
Waterloo MSA Limited Partnership	0002844546
WISCONSIN RSA #1 LIMITED PARTNERSHIP	0005224746
WISCONSIN RSA #2 PARTNERSHIP	0006492631
WISCONSIN RSA #6 PARTNERSHIP, LLP	0005225859
WISCONSIN RSA NO. 8 LIMITED PARTNERSHIP	0004082681
WWC HOLDING CO., INC.	0018437582
WWC License L.L.C.	0018437699

Company Name	FRN
WWC Texas RSA Limited Partnership	0001565563
Wyoming 1-Park Limited Partnership	0001608157

# Exhibit 2 Chart 1

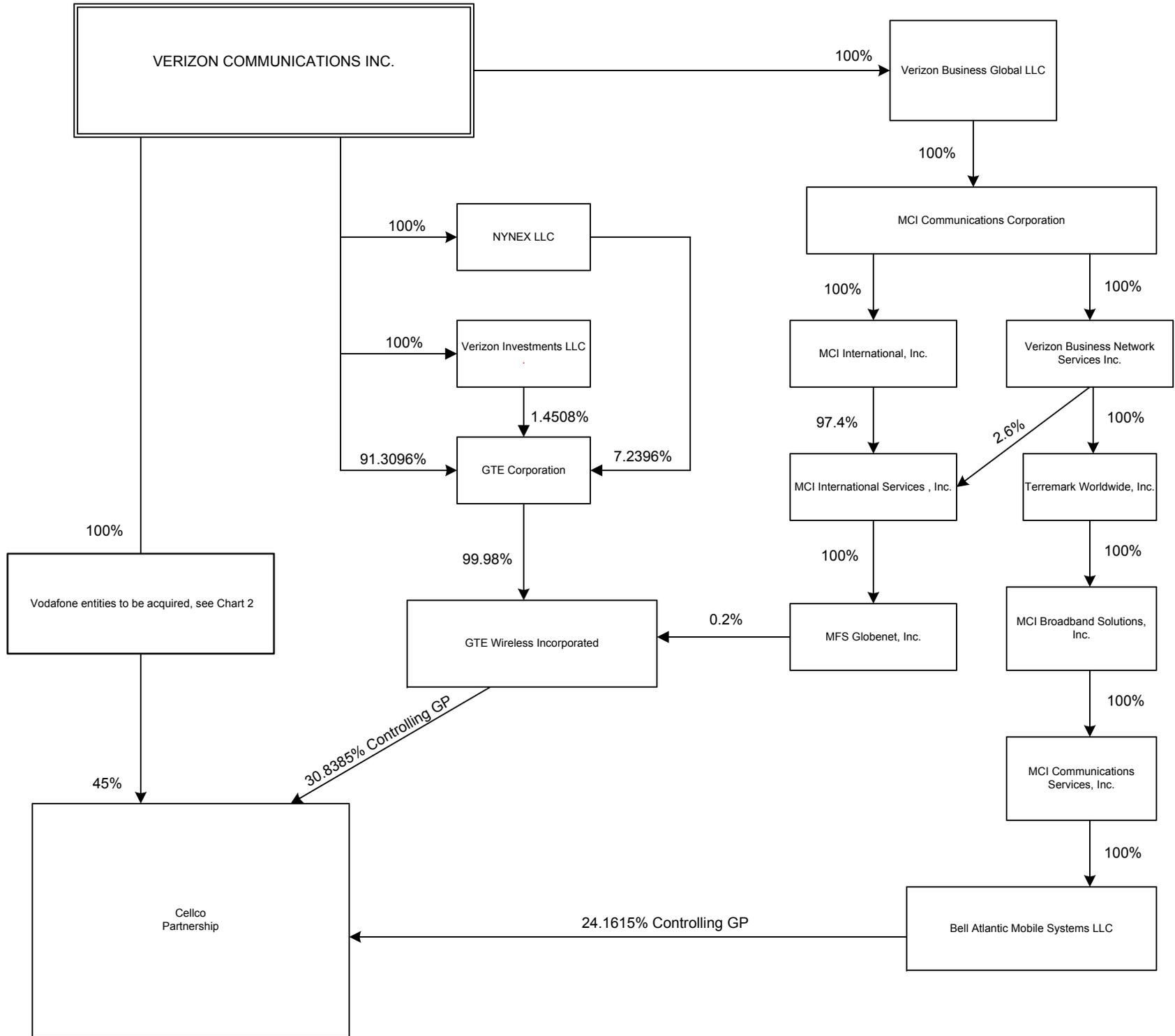
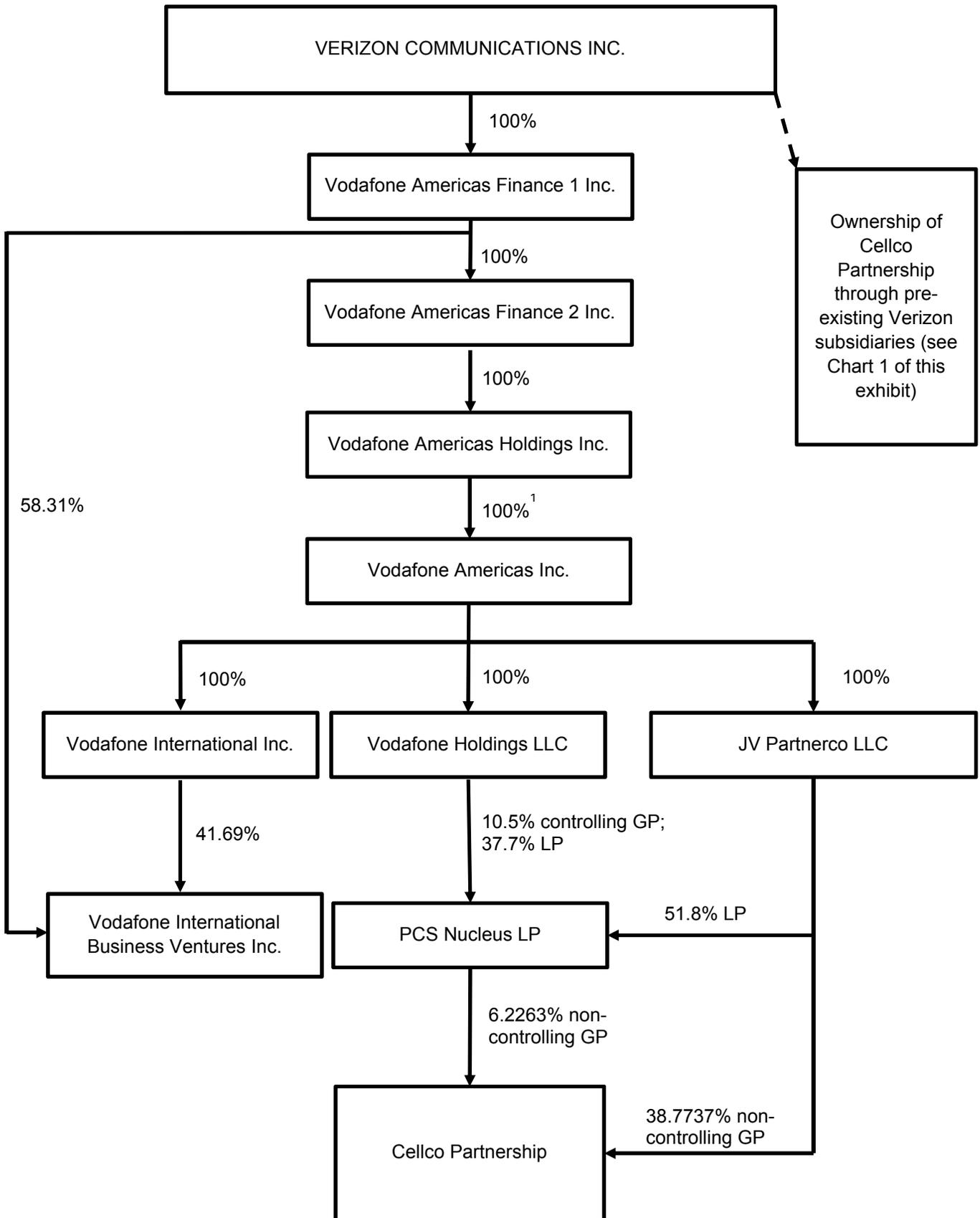


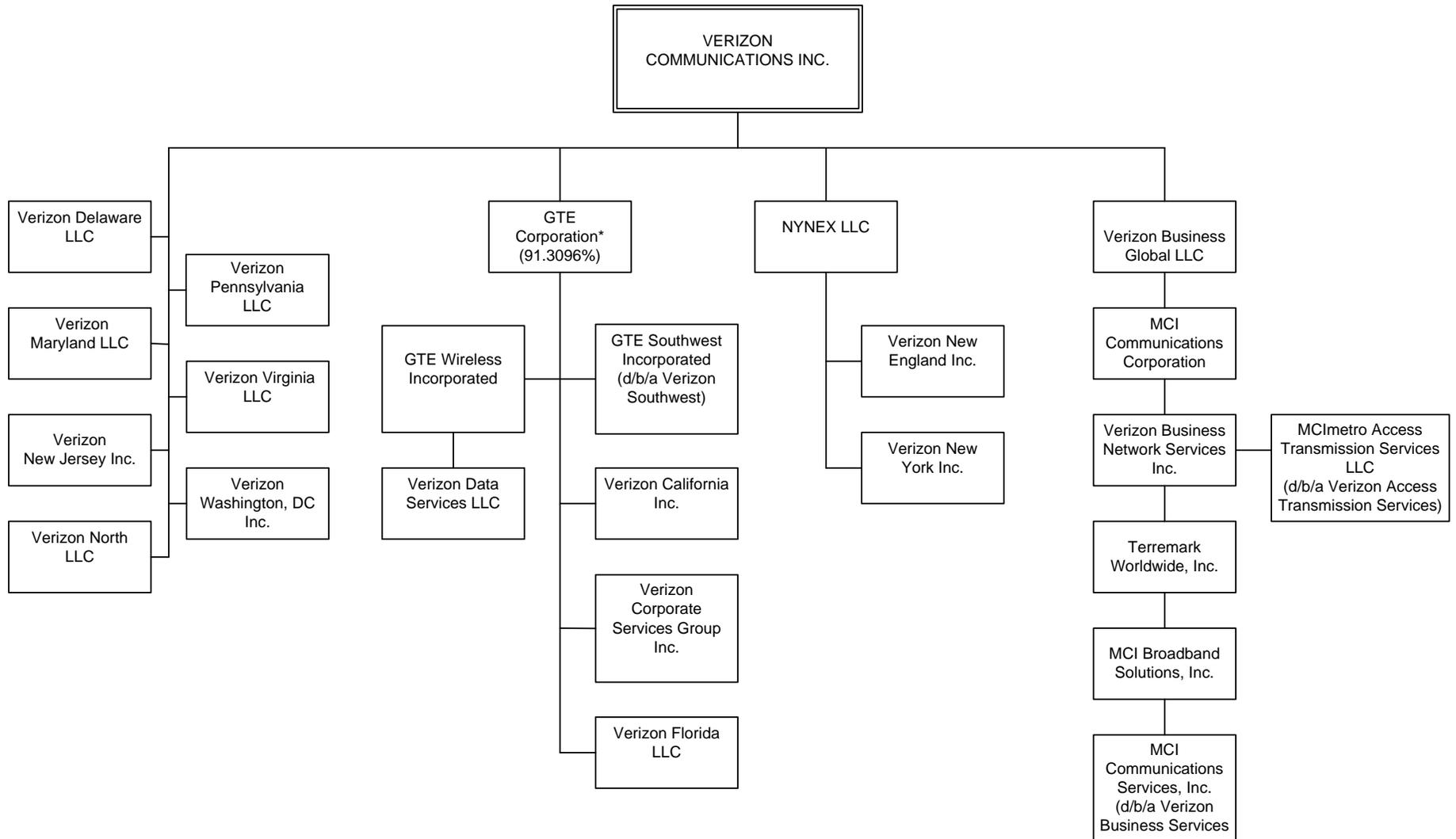
Exhibit 2  
Chart 2



<sup>1</sup> This figure has been rounded to the nearest percent. Comcast MO SPC II, LLC, a company incorporated in Delaware, owns preferred shares equal to less than one half of one percent of the issued and outstanding equity.

# Exhibit 2

## Chart 3

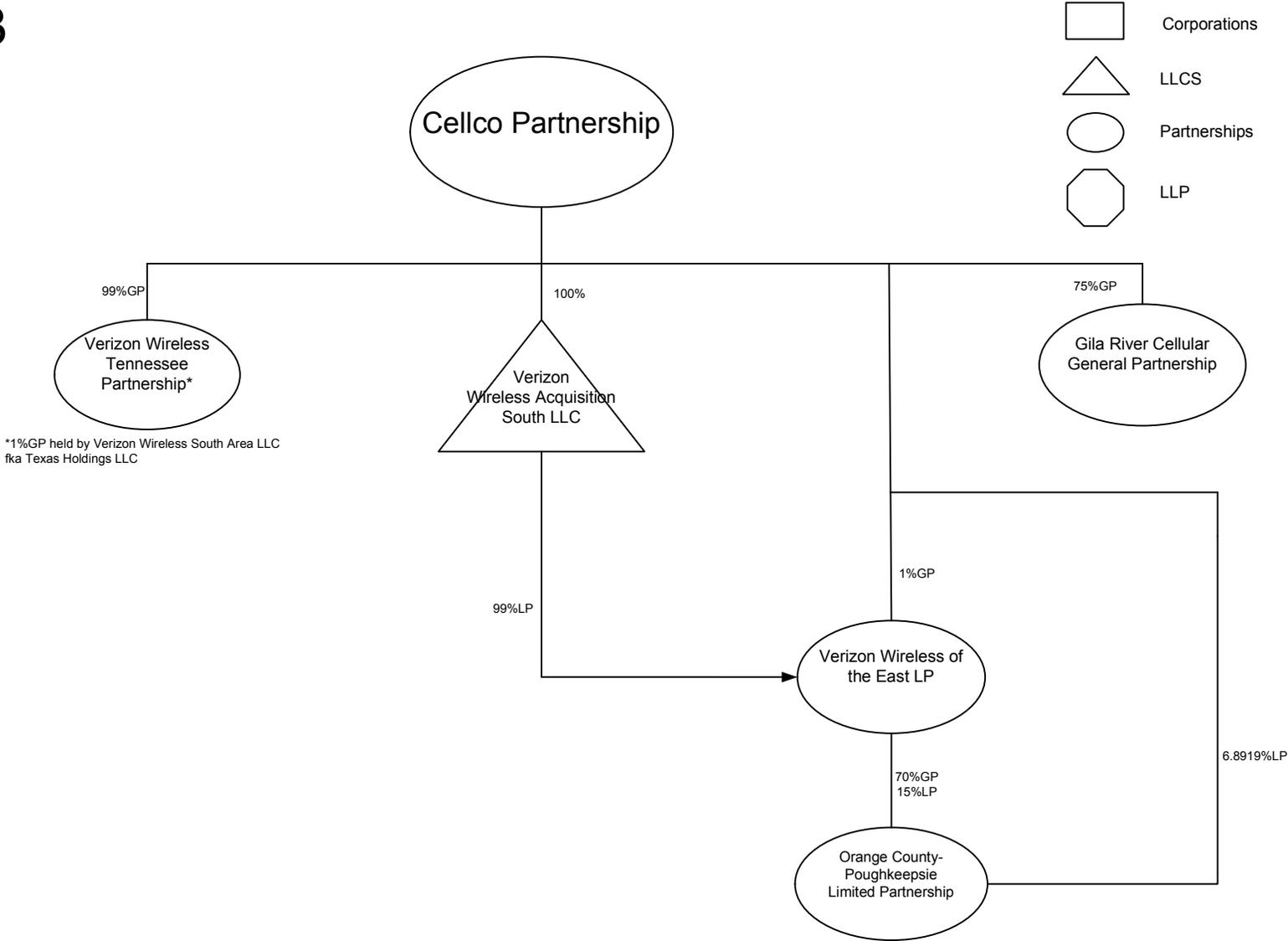


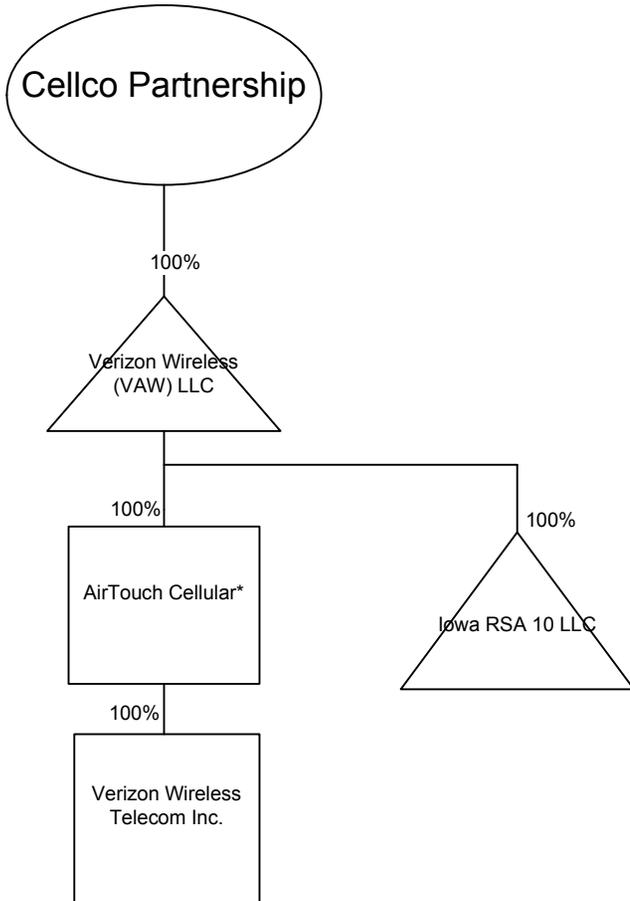
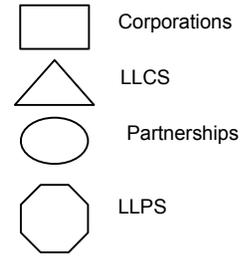
All ownership interests depicted are 100% unless otherwise indicated.

\*Ownership of GTE Corporation is as follows: 91.3096% by Verizon Communications Inc.; 7.2396% by NYNEX LLC; and 1.4508% by Verizon Investments LLC\*\*

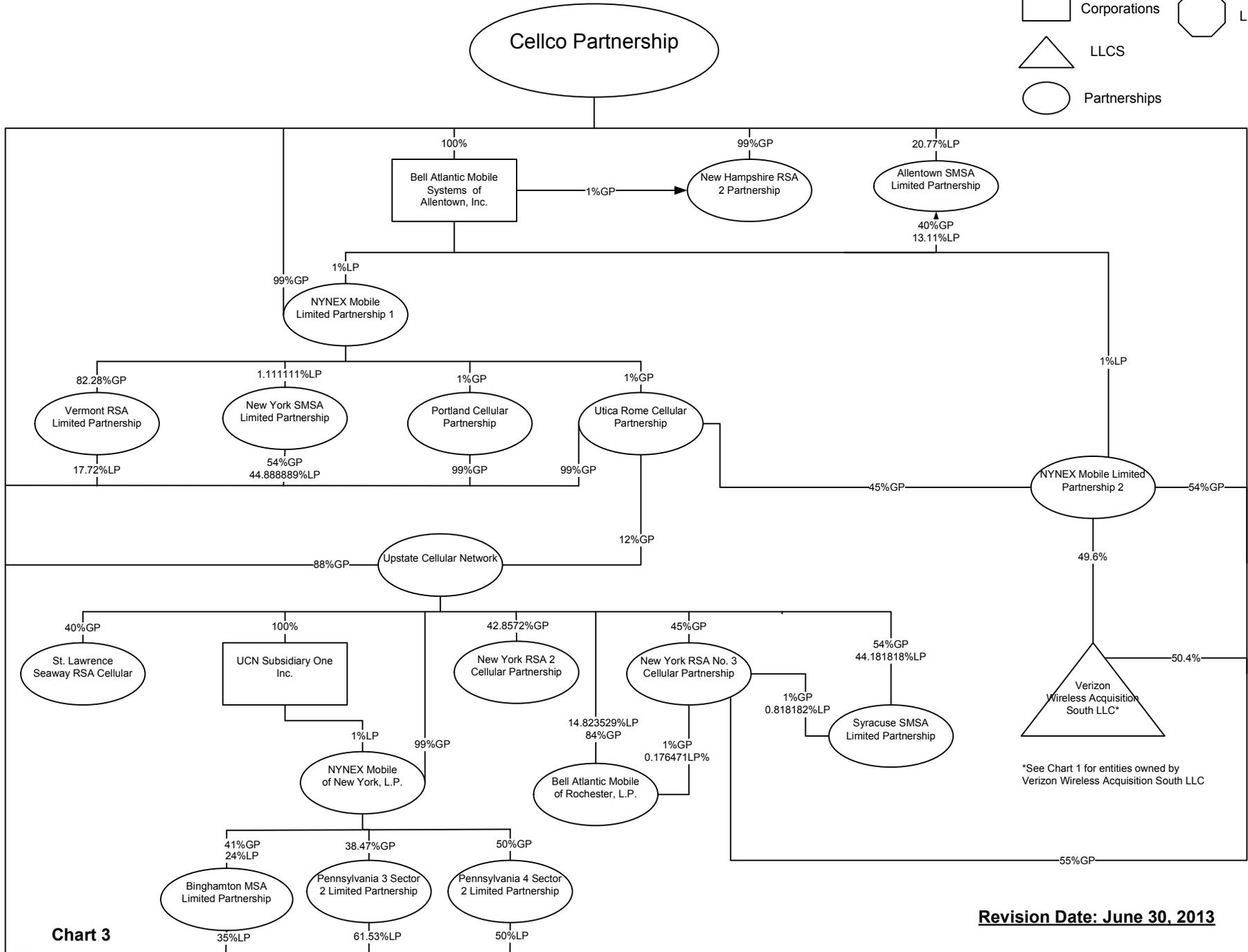
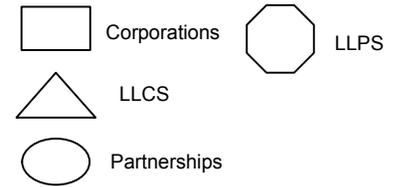
\*\*Verizon Investments LLC is owned 100% by Verizon Communications Inc.

# Exhibit 3





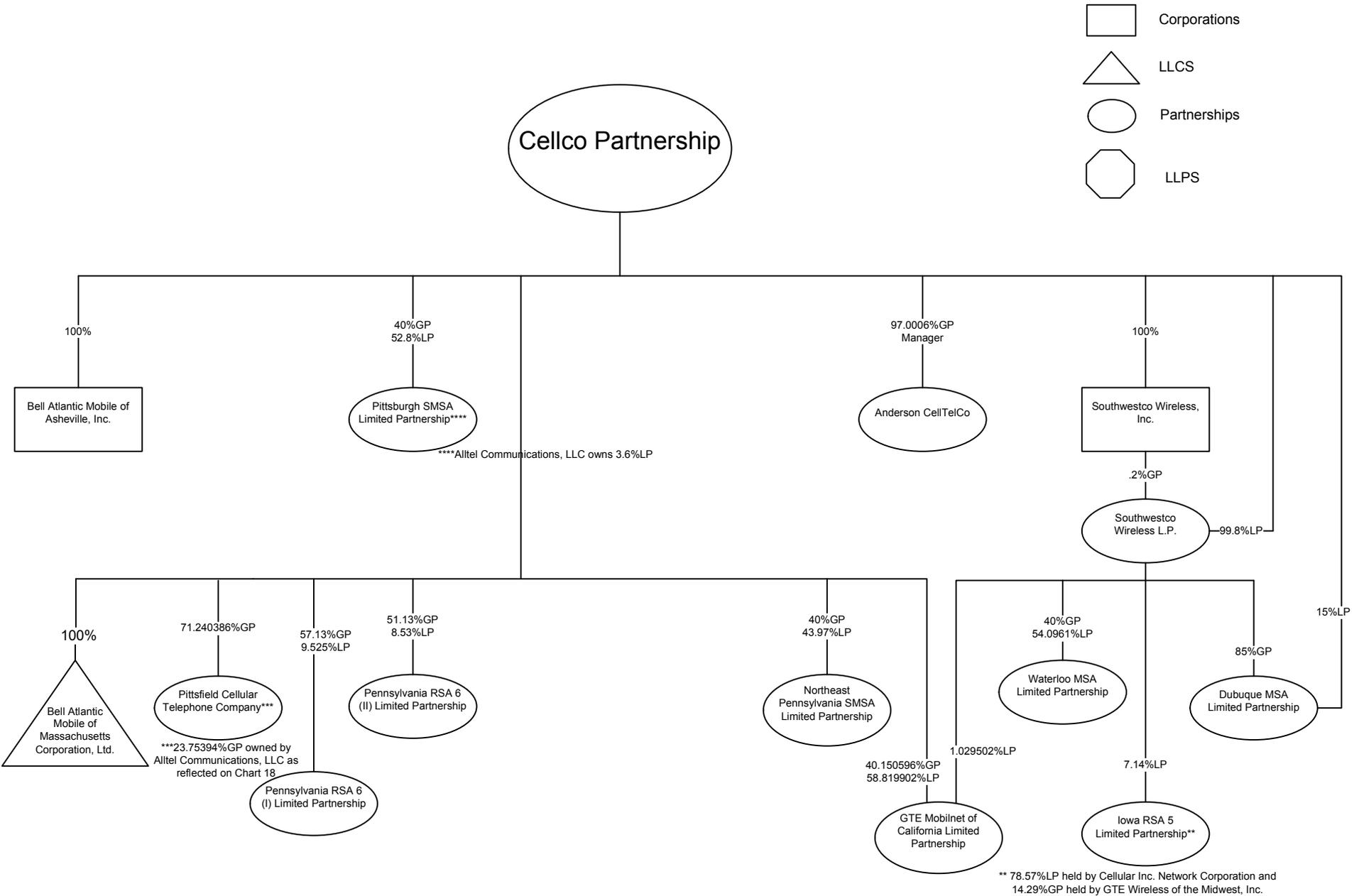
*\*See Charts 2, 5 & 15 for all entities owned by AirTouch*



\*See Chart 1 for entities owned by Verizon Wireless Acquisition South LLC

**Chart 3**

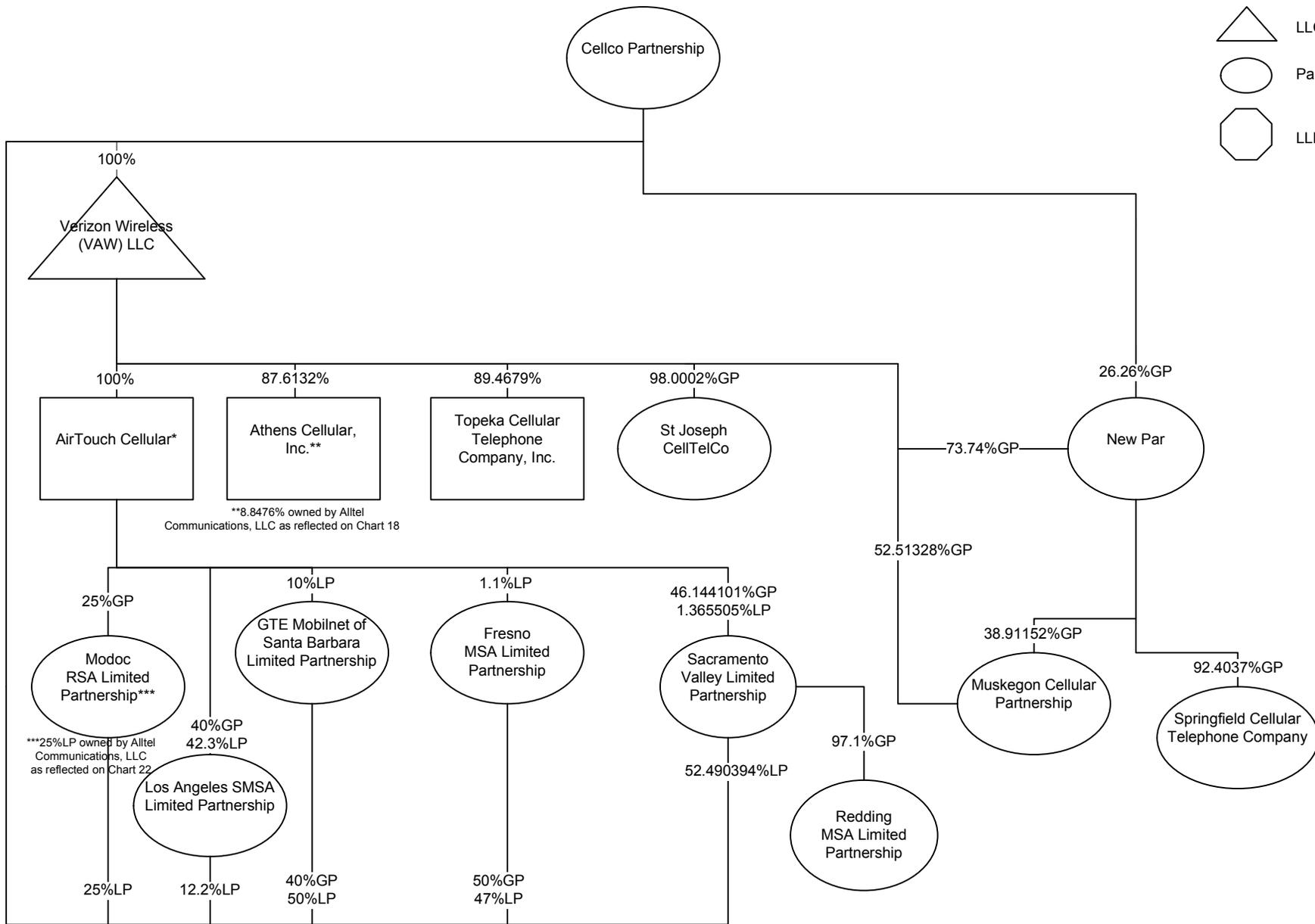
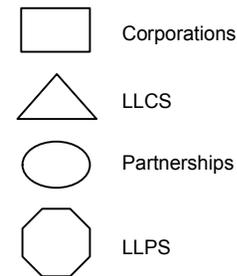
**Revision Date: June 30, 2013**



-  Corporations
-  LLCS
-  Partnerships
-  LLPS

**Chart 4**

**Revision Date: June 30, 2013**



\*See chart 2, 5 & 15 for all entities owned by AirTouch Cellular

**Chart 5**

**Revision Date: June 30, 2013**

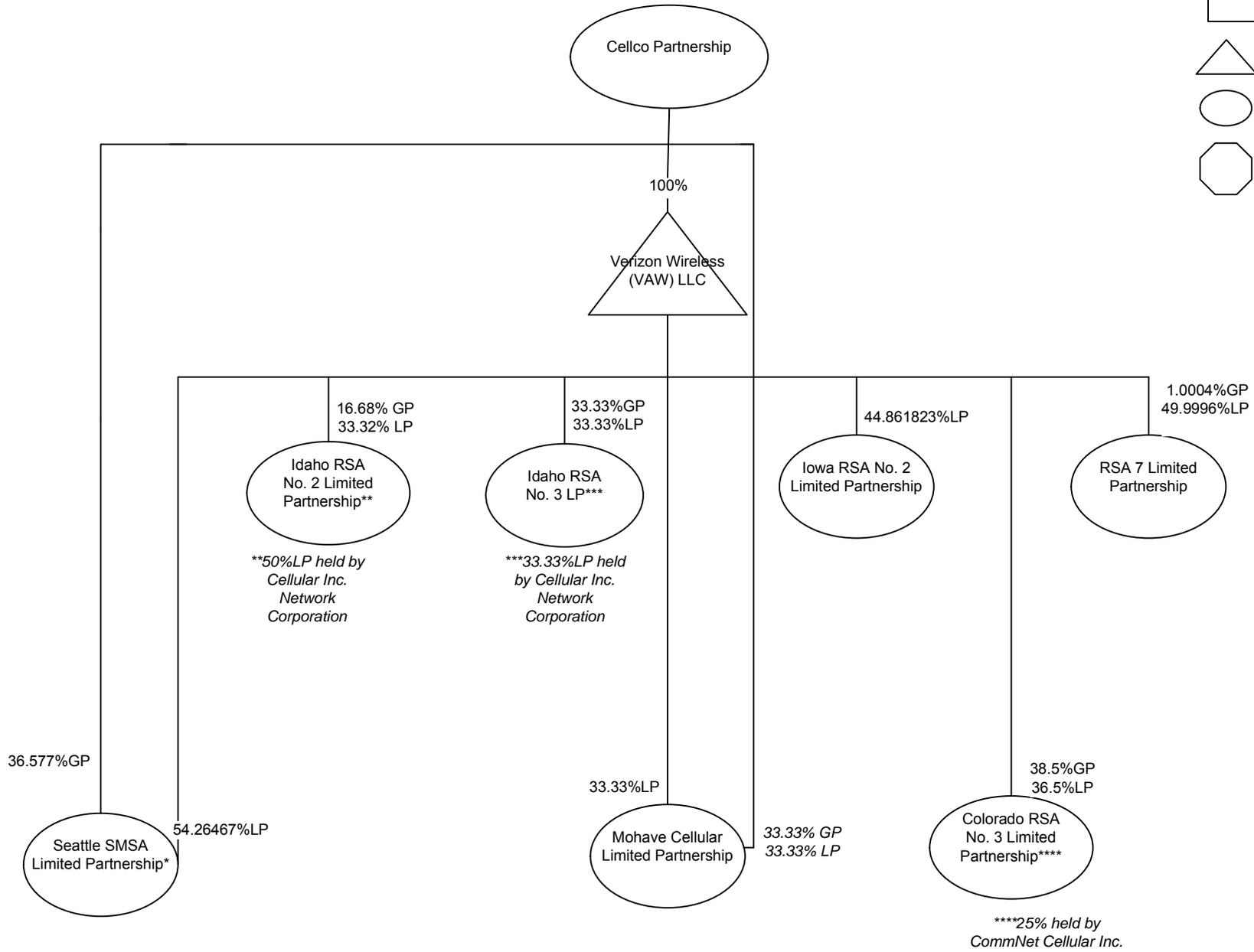
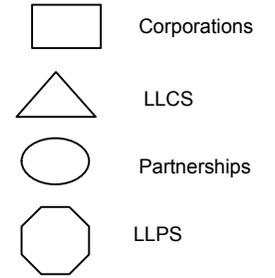


Chart 6

Revision Date: June 30, 2013

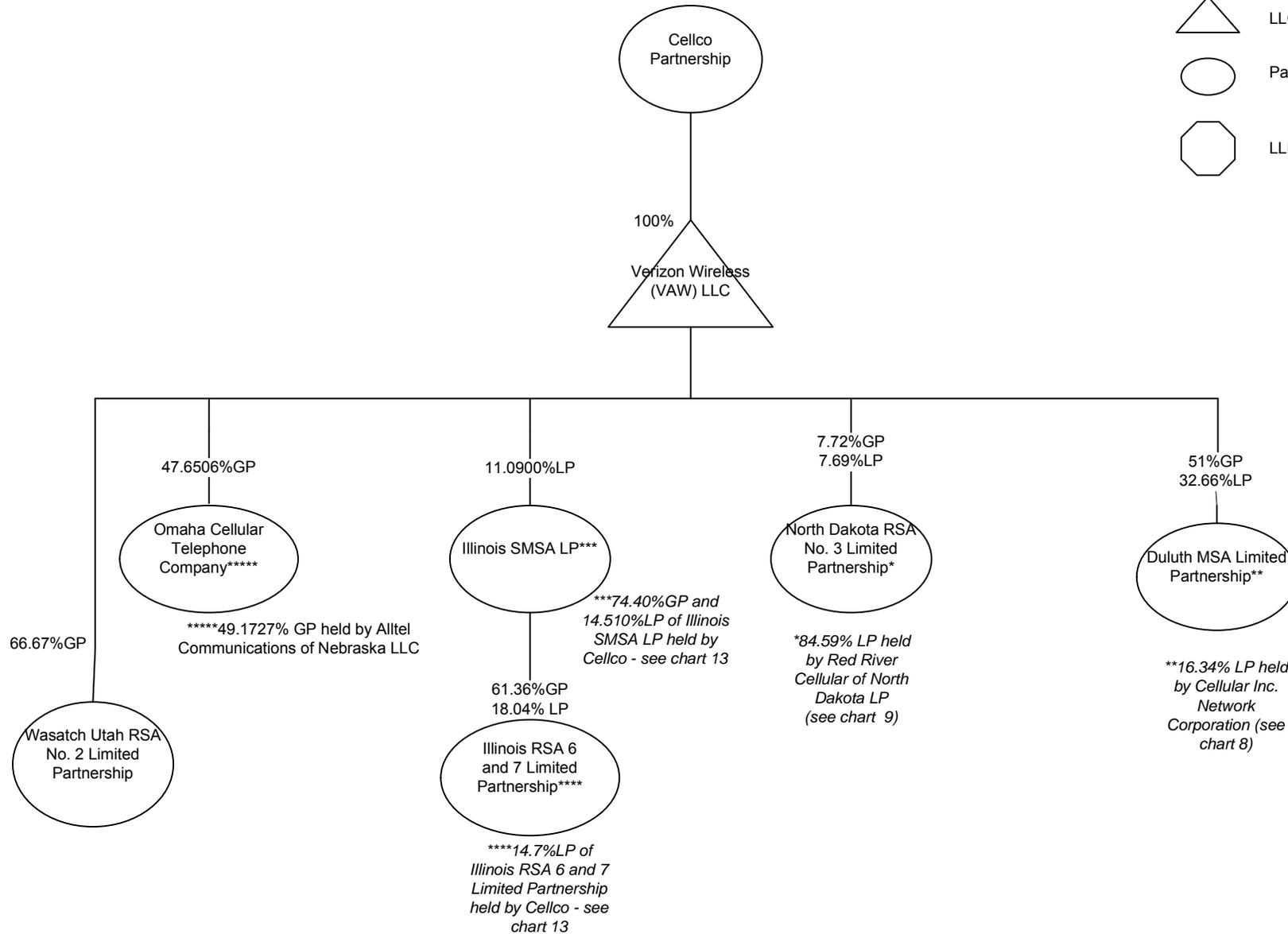
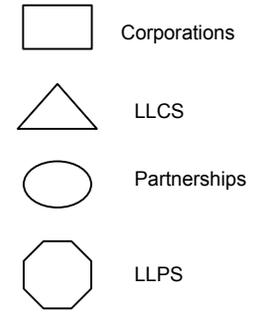


Chart 7

Revision Date: June 30, 2013

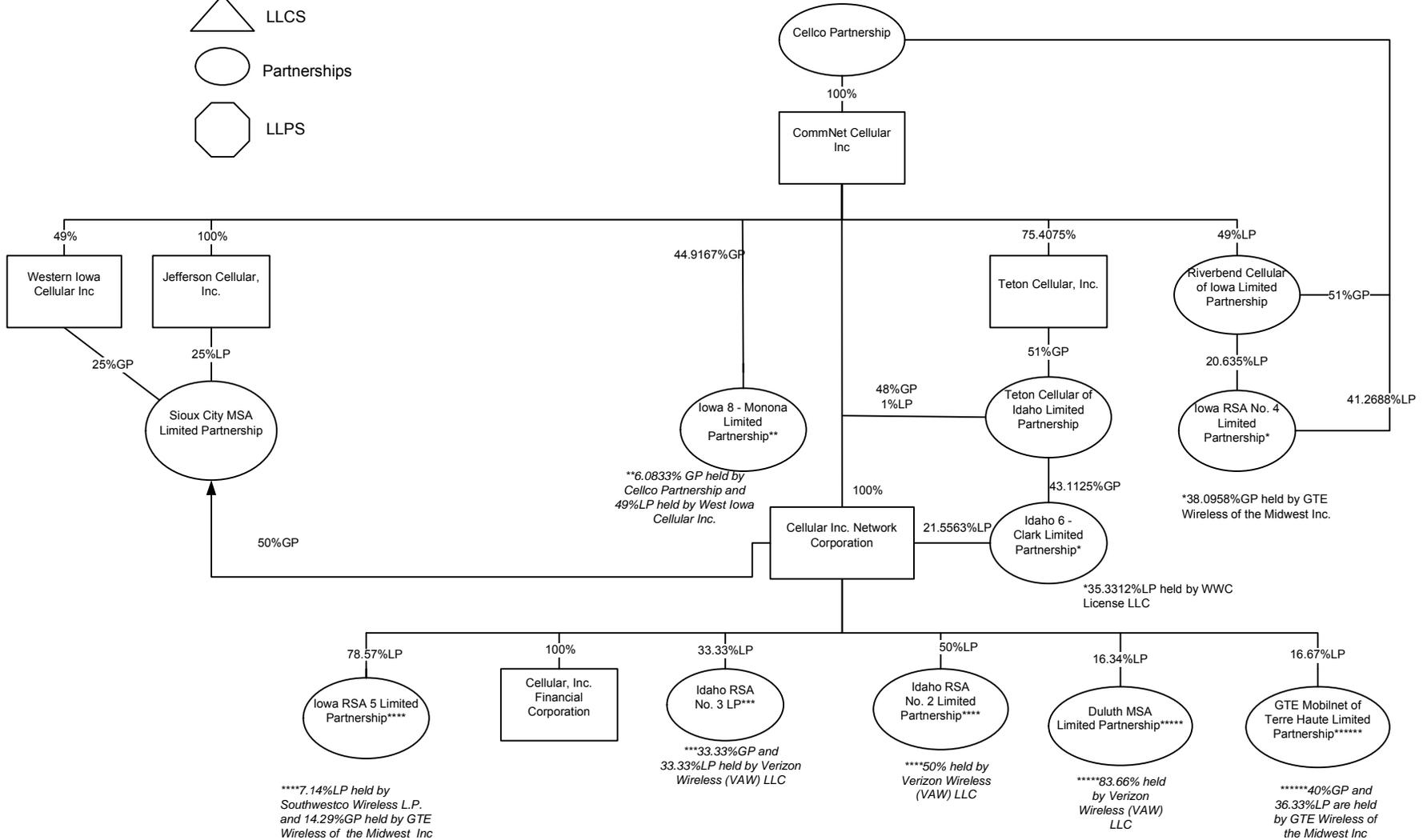
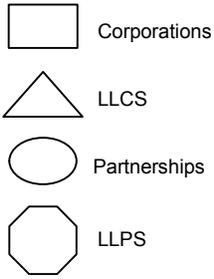


Chart 8

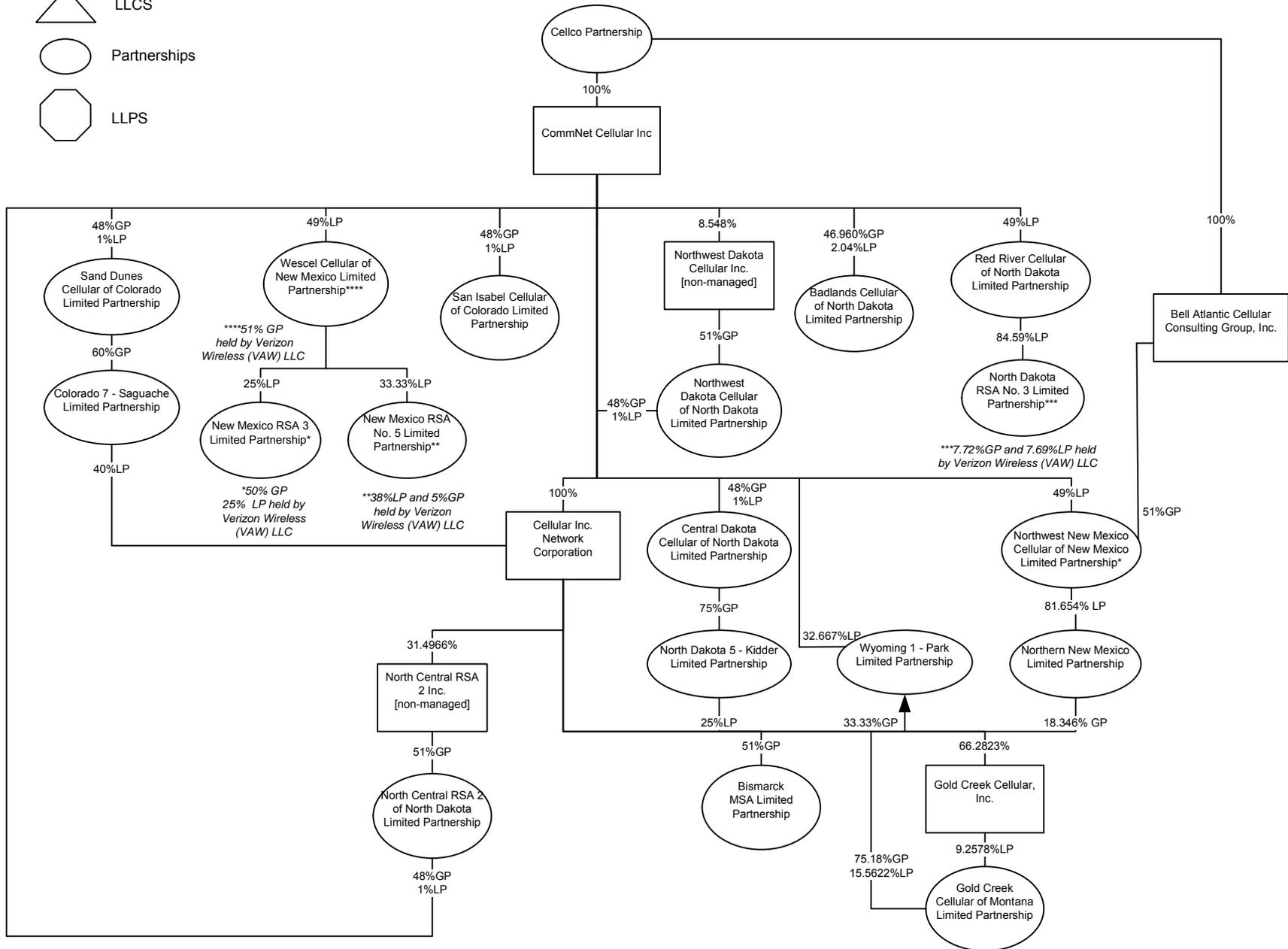
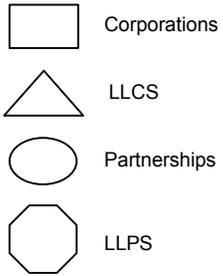
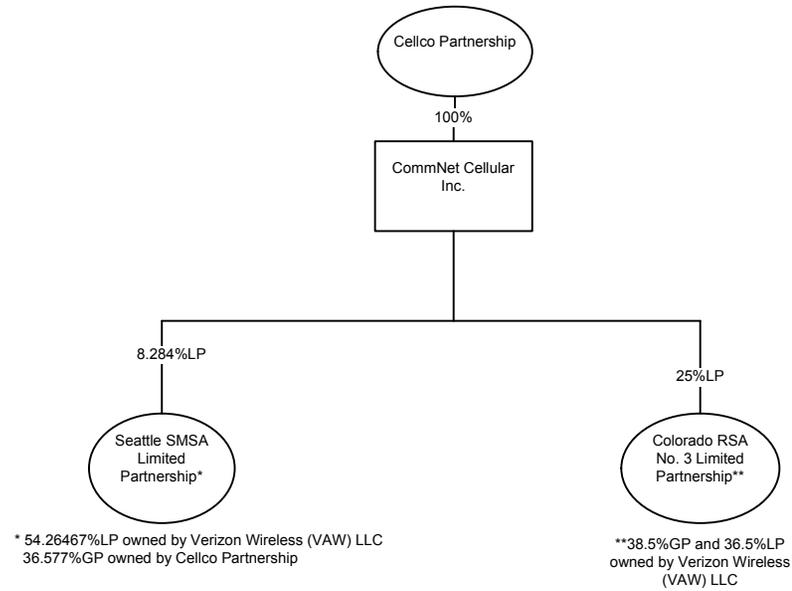
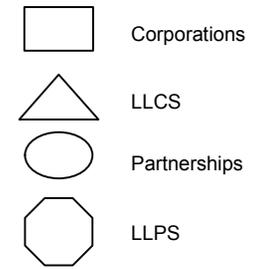
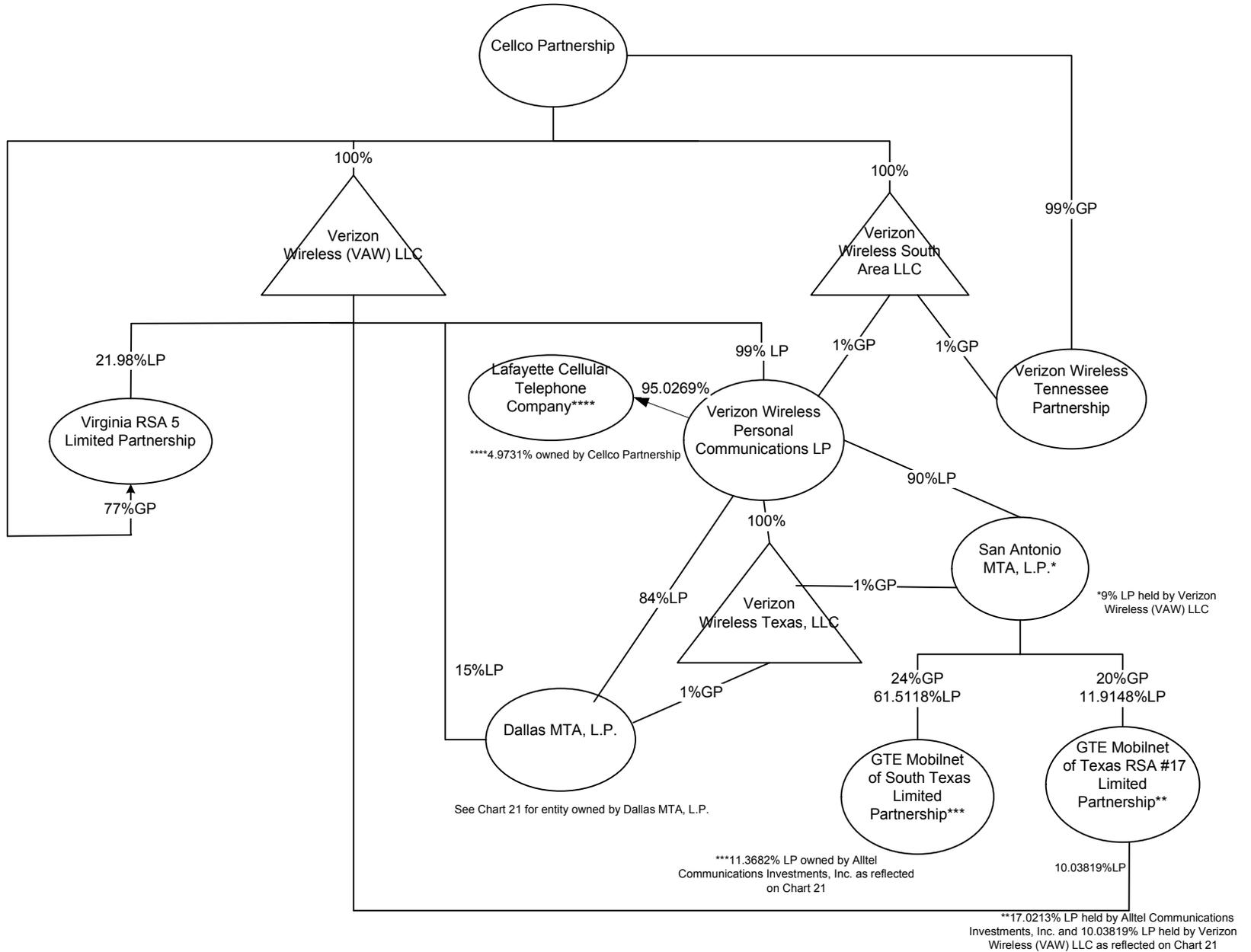
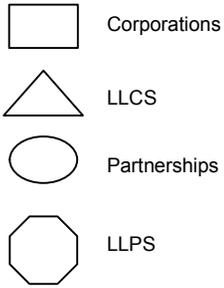


Chart 9

Revision Date: June 30, 2013





**Revision Date: June 30, 2013**

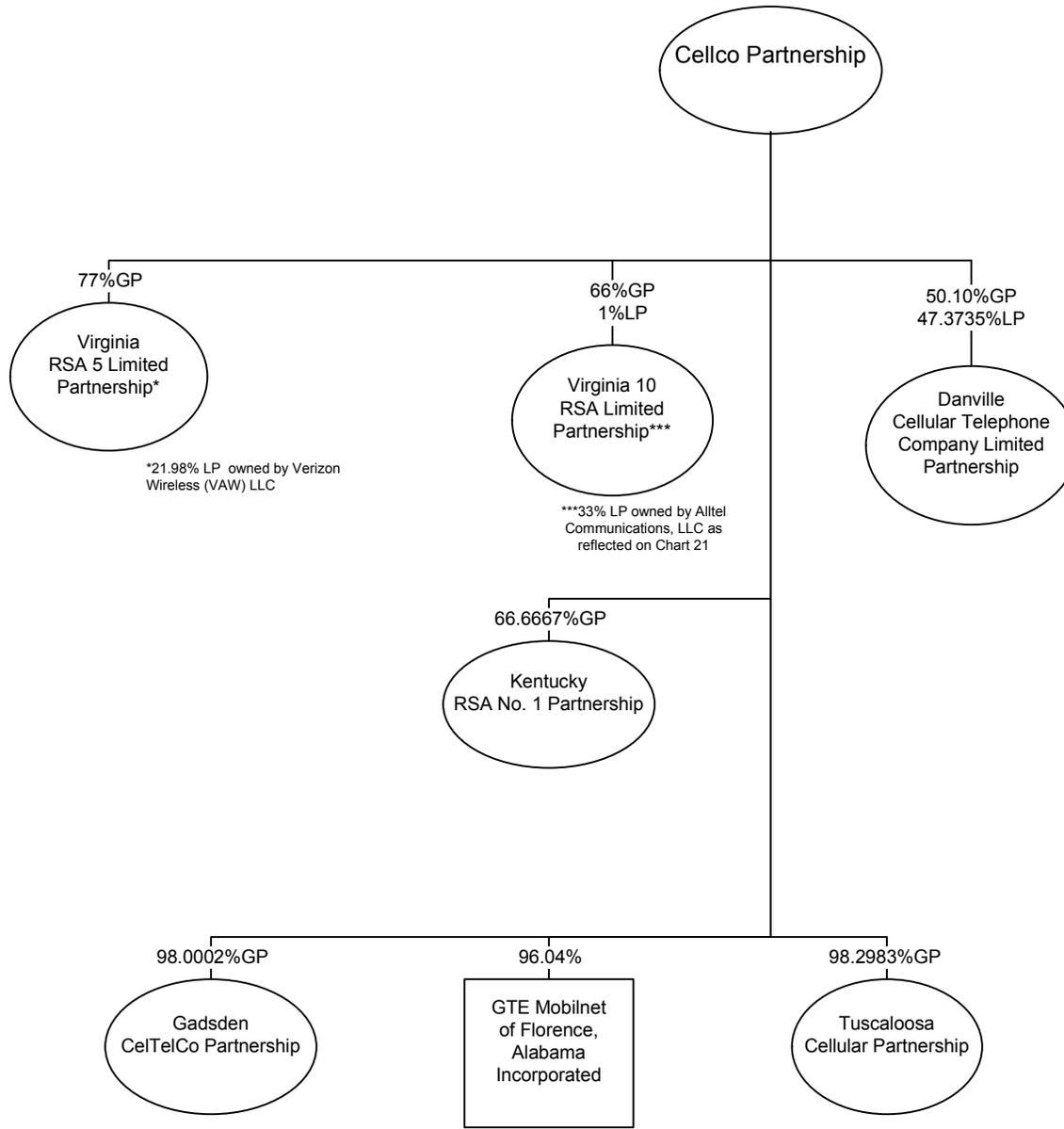
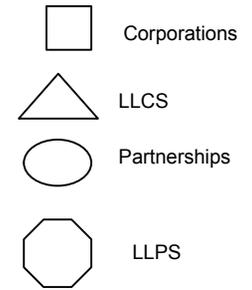
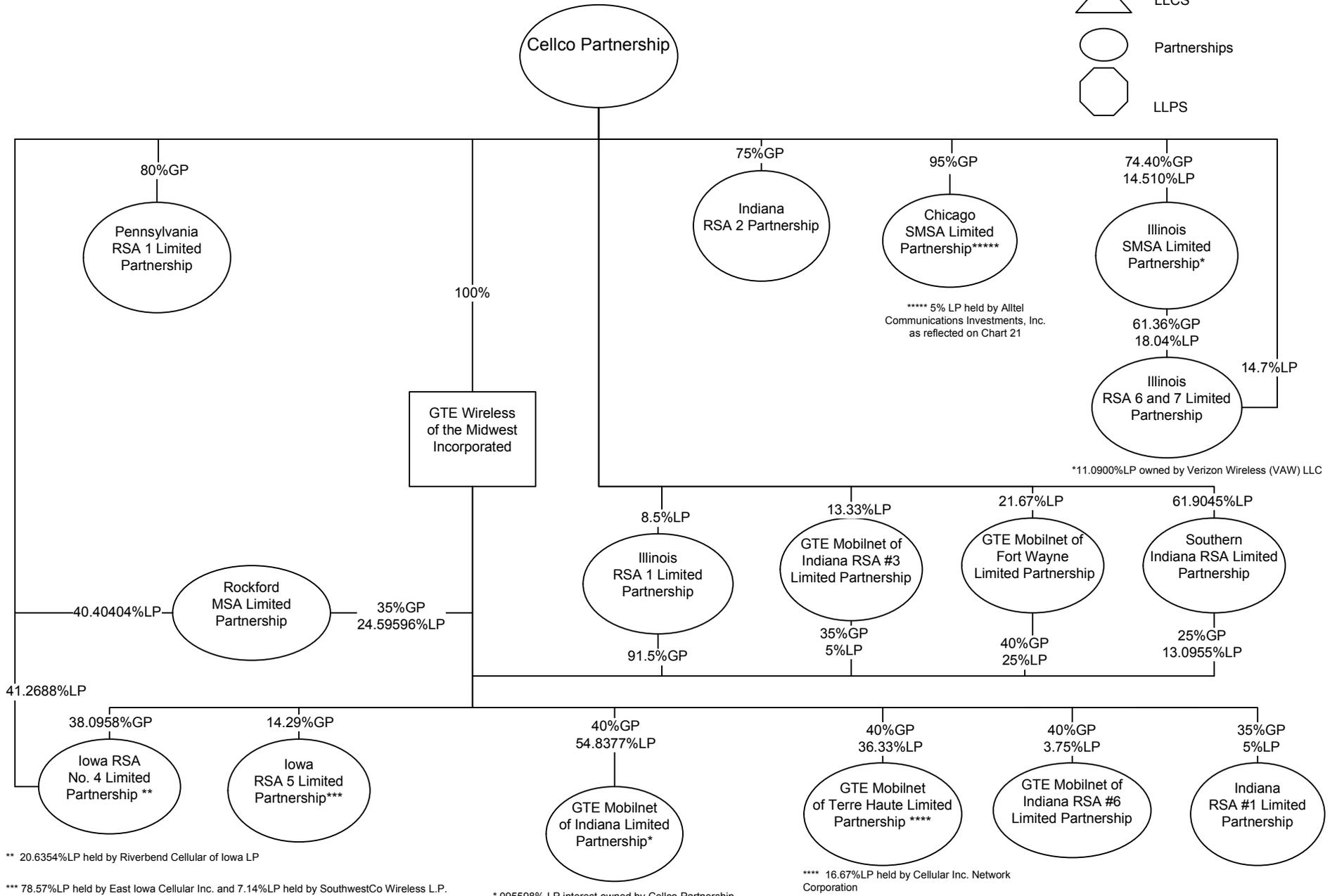
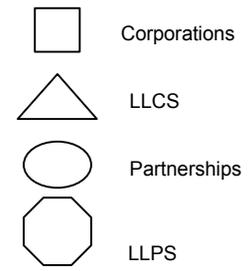


Chart 12

Revision Date: June 30, 2013



\*\* 20.6354% LP held by Riverbend Cellular of Iowa LP

\*\*\* 78.57% LP held by East Iowa Cellular Inc. and 7.14% LP held by SouthwestCo Wireless L.P.

\*.095598% LP interest owned by Cellco Partnership

\*\*\*\* 16.67% LP held by Cellular Inc. Network Corporation

**Chart 13**

**Revision Date: June 30, 2013**

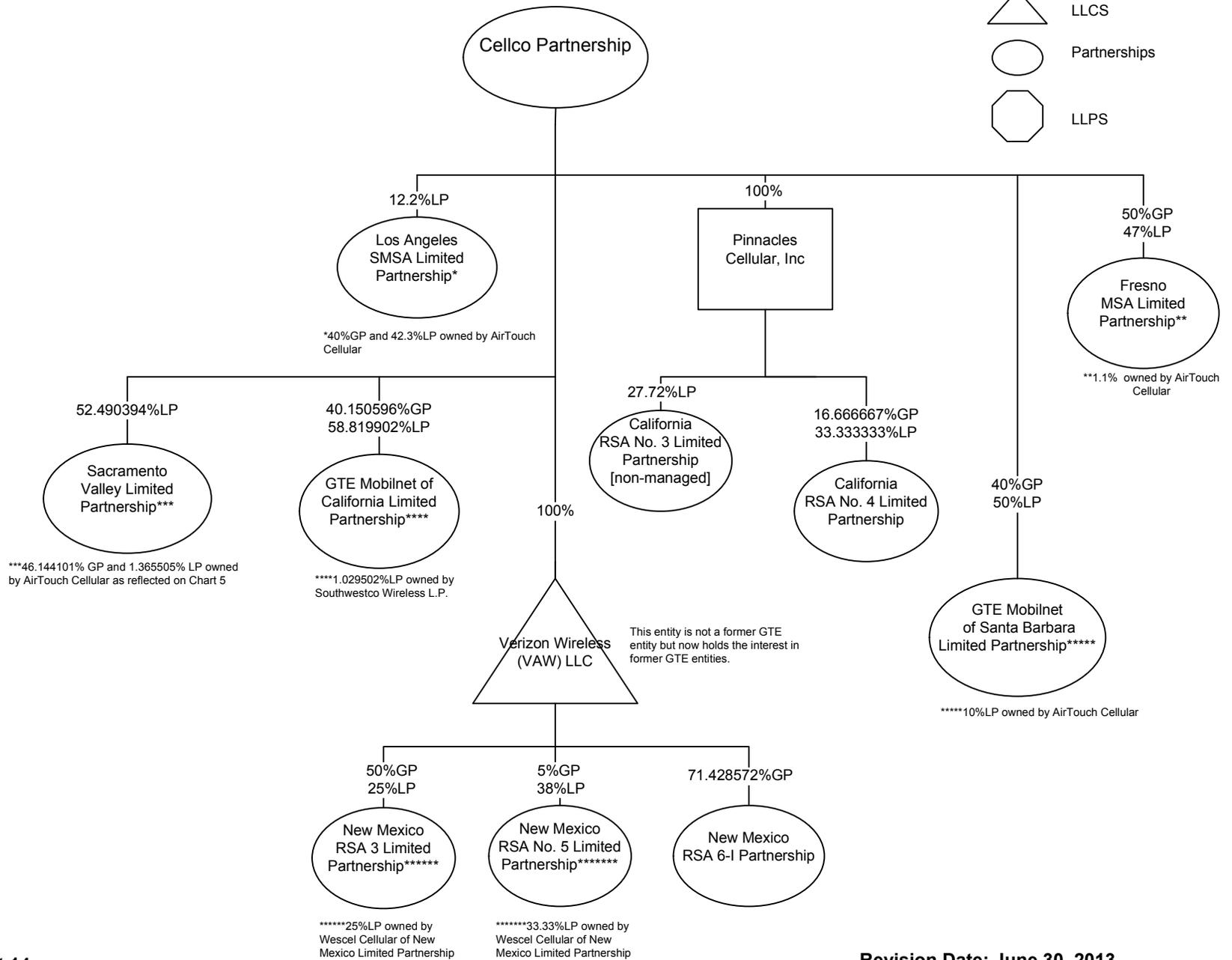
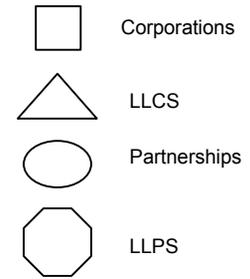
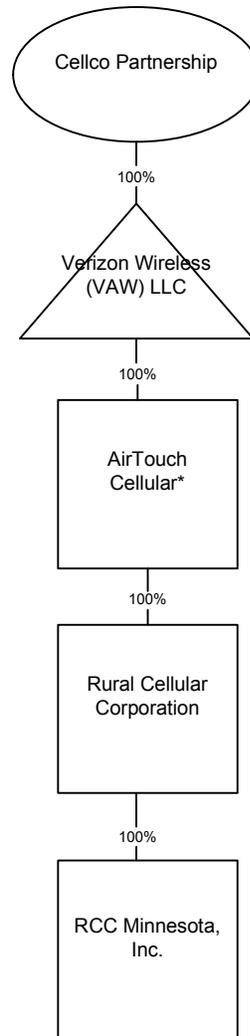
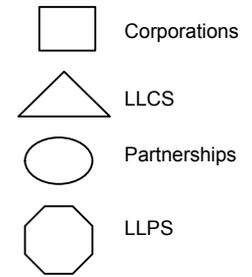


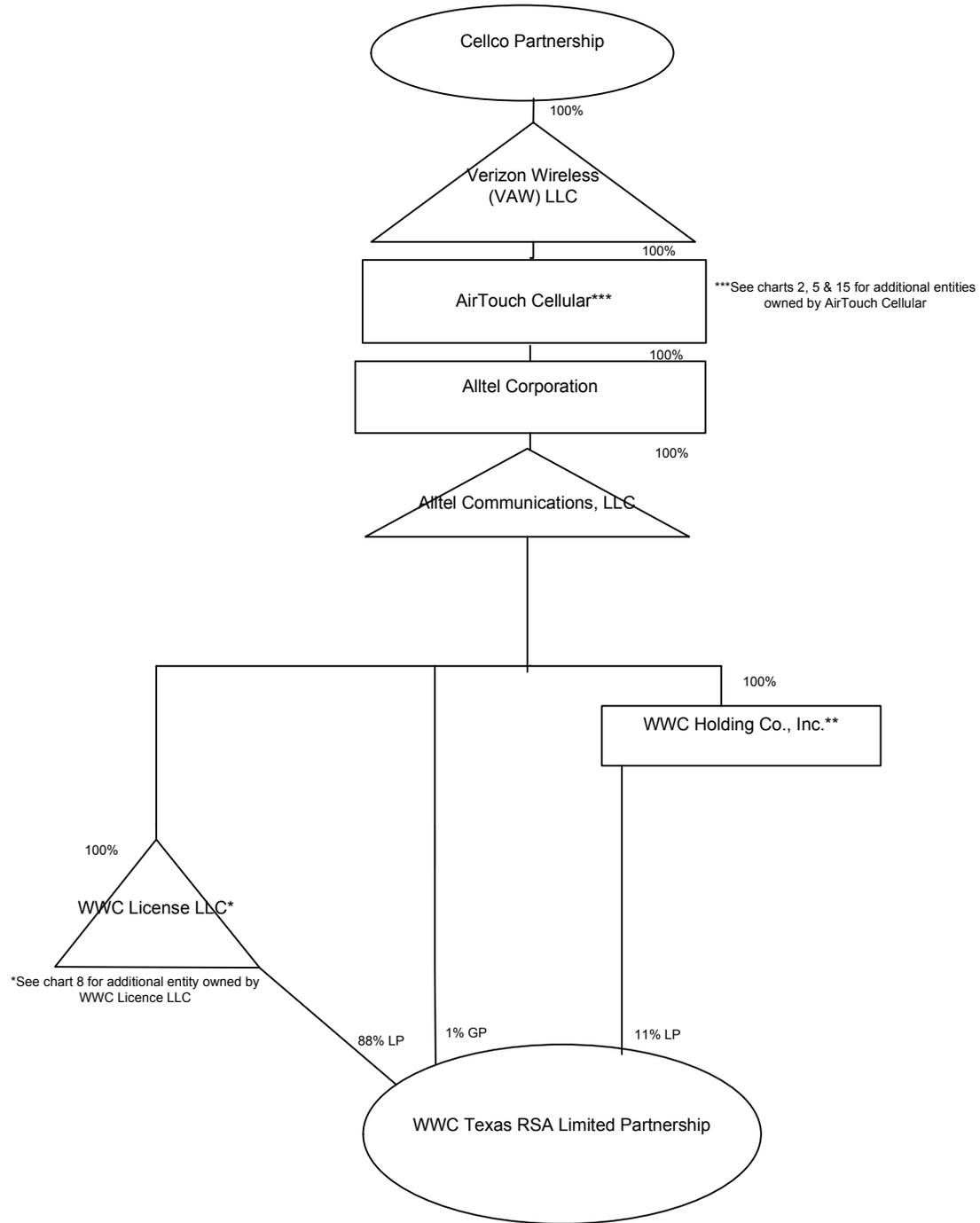
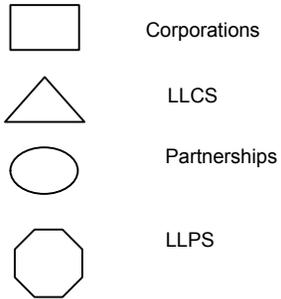
Chart 14

Revision Date: June 30, 2013

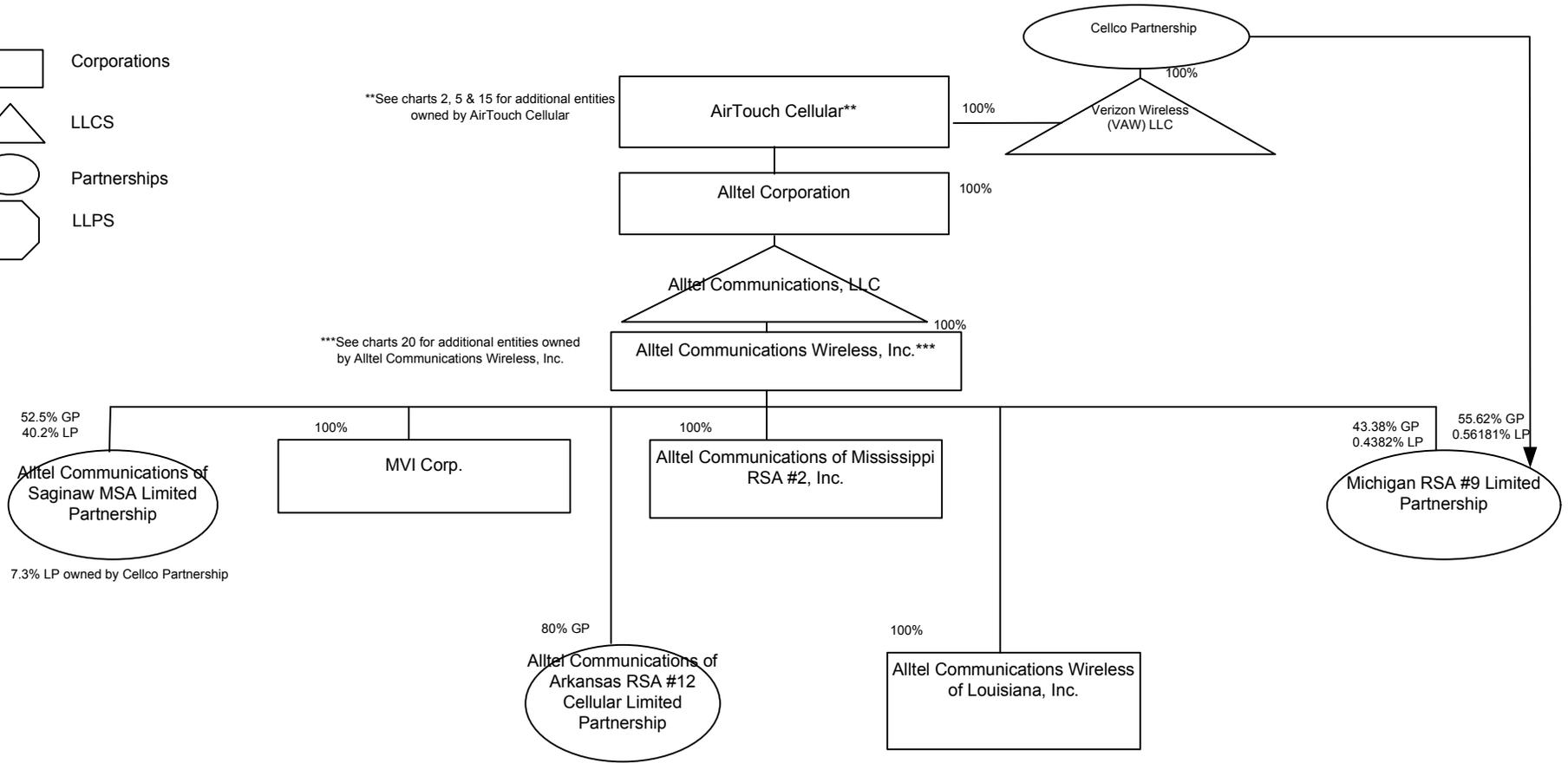
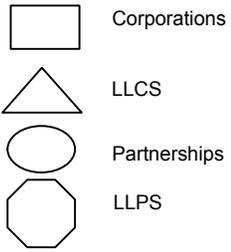


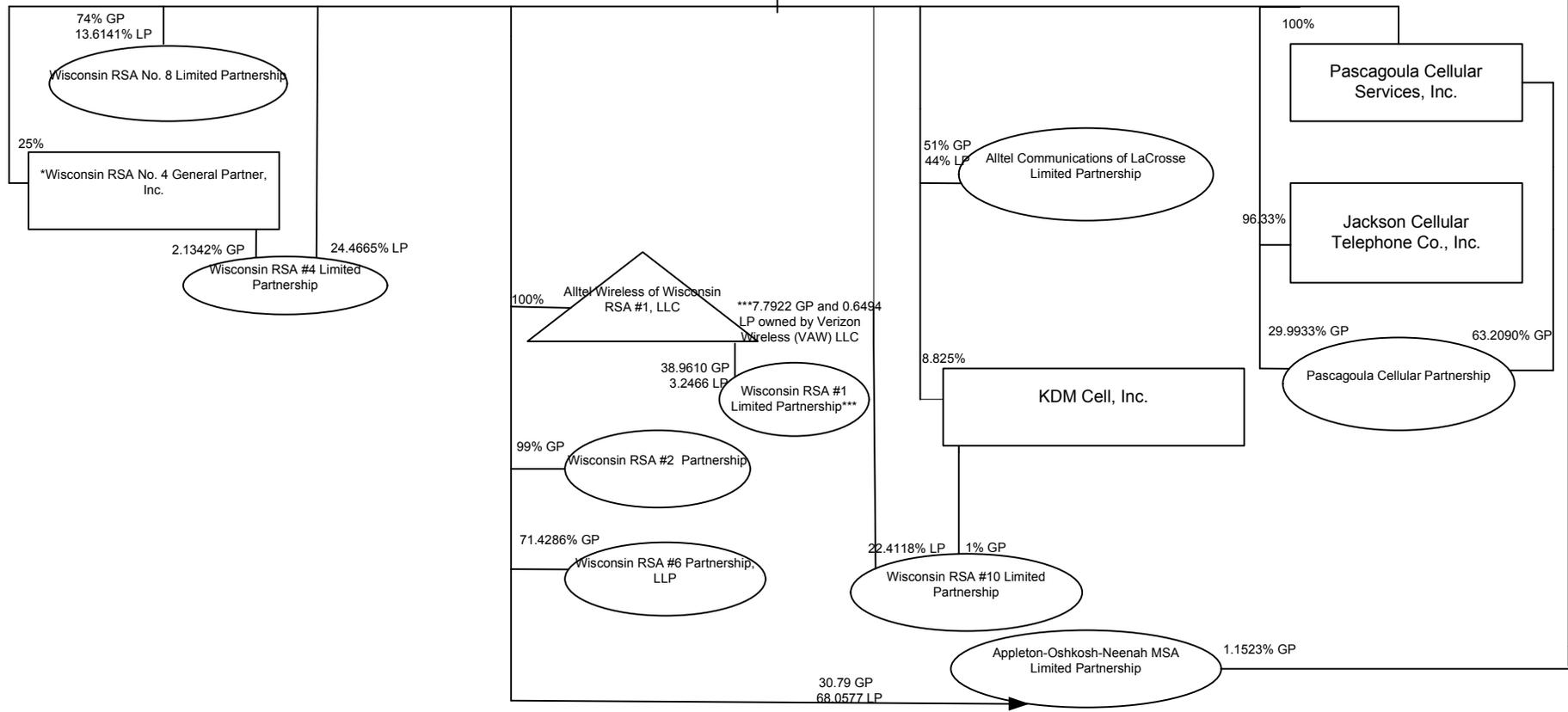
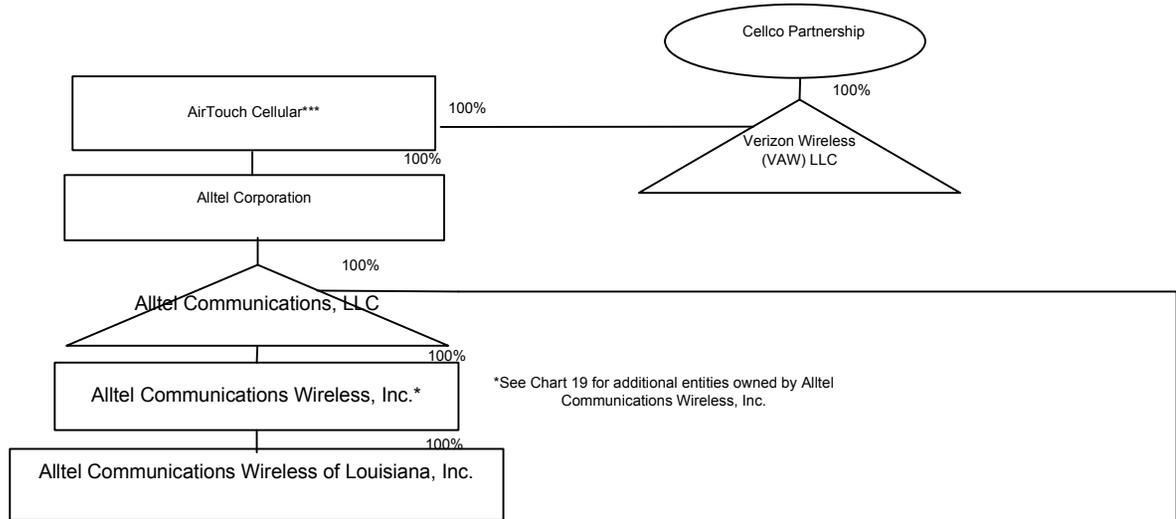
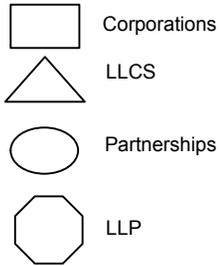
\* See charts 2 & 5 for all entities owned by AirTouch Cellular

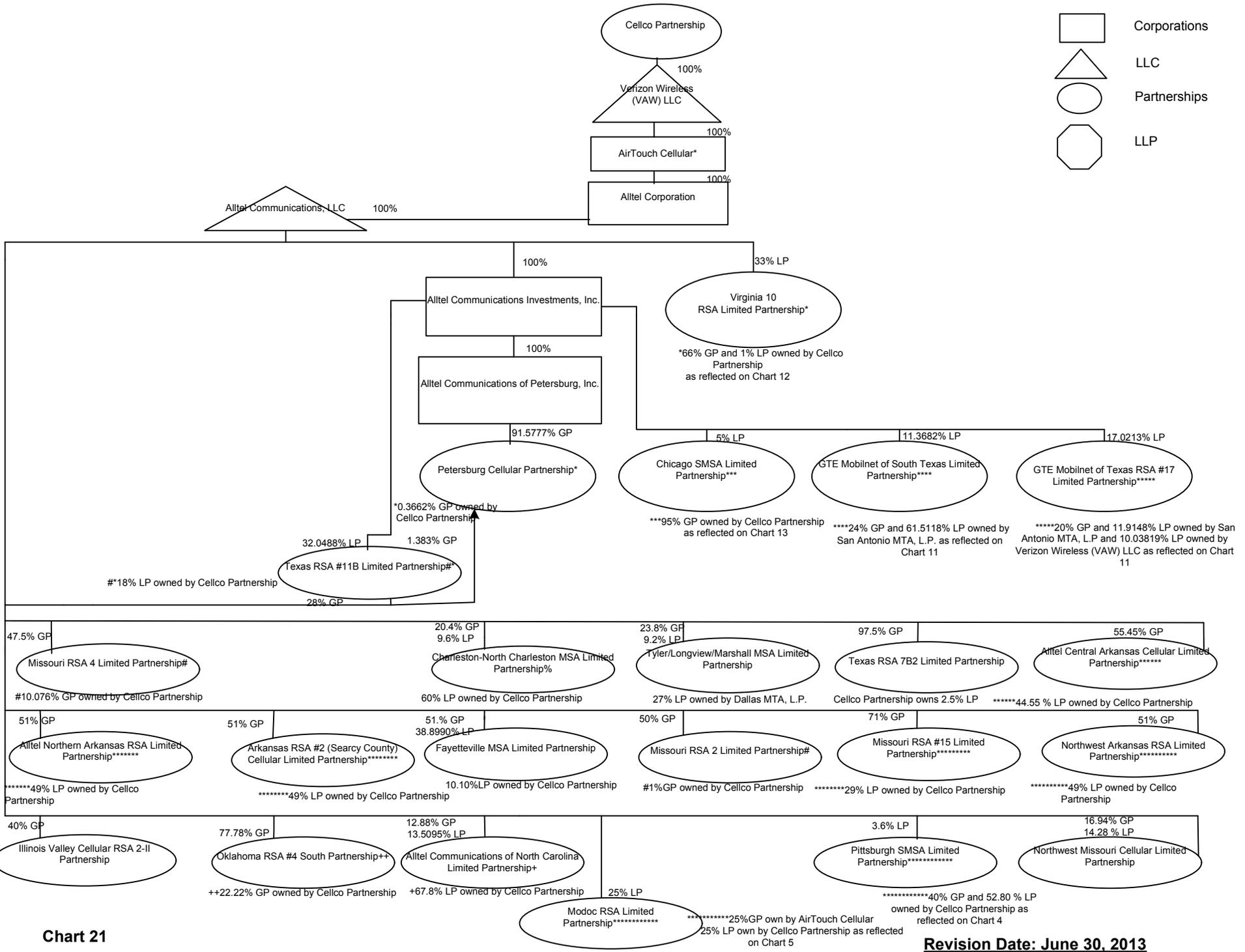
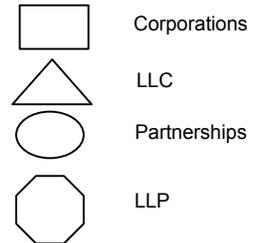












**Chart 21**

**Revision Date: June 30, 2013**