

Declaration of Robert T. Smith

I, Robert T. Smith, state that I have assisted in the preparation of and have reviewed a final draft of the response of Maritime Communications/Land Mobile, LLC to the Enforcement Bureau's interrogatories served on Maritime on February 28, 2012, in Federal Communications Commission EB Docket No. 11-71; that I am generally familiar with the factual matters addressed in said response; and that the factual assertions made in the response are, to the best of my knowledge, information, and belief, are 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 13th day of March, 2012.


Robert T. Smith

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of March, 2012, I caused copies of the foregoing pleading to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

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EXHIBIT 8

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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 Authorizations)	
in the Wireless Radio Services;)	
)	
Applicant with ENCANA OIL AND GAS (USA), INC.;)	Application File Nos.
DUQUESNE LIGHT COMPANY; DCP)	0004030479, 0004144435,
MIDSTREAM, LP; JACKSON COUNTY RURAL)	0004193028, 0004193328,
MEMBERSHIP ELECTRIC COOPERATIVE; PUGET)	0004354053, 0004309872,
SOUND ENERGY, INC.; ENBRIDGE ENERGY)	0004310060, 0004314903,
COMPANY, INC.; INTERSTATE POWER AND)	0004315013, 0004430505,
LIGHT COMPANY; WISCONSIN POWER AND)	0004417199, 0004419431,
LIGHT COMPANY; DIXIE ELECTRIC)	0004422320, 0004422329,
MEMBERSHIP CORPORATION, INC.; ATLAS)	0004507921, 0004153701,
PIPELINE—MID CONTINENT, LLC; DENTON)	0004526264, 0004636537,
COUNTY ELECTRIC COOPERATIVE, INC., DBA)	and 0004604962
COSERV ELECTRIC; AND SOUTHERN)	
CALIFORNIA REGIONAL RAIL AUTHORITY)	
)	
For Commission Consent to the Assignment of Various)	
Authorizations in the Wireless Radio Services)	

To: Marlene H. Dortch, Secretary
Attn: The Honorable Richard L. Sippel, Chief Administrative Law Judge

SUPPLEMENTAL RESPONSES PER ORDER FCC 12M-38

This filing is being made on behalf of Maritime Communications/Land Mobile, LLC (Maritime) in compliance with numbered item 2 in the Presiding Judge's Order (FCC 12M-38; rel. August 2, 2012).

Reference is made to the attachment to the Order, a document prepared by the Enforcement Bureau and styled "Maritime's Interrogatory Deficiencies on Operating Status as of 8/1/2012 – Discovery the Enforcement Bureau Still needs on Issue G."

Maritime raises two preliminary points: First, Maritime does not accept the Bureau's characterization or title for its request; to the contrary, Maritime has provided extensive information on these stations and their operational status in its previous responses to discovery requests and in other filings. Second, it is Maritime's understanding, based on the discussion at the August 1, 2012, prehearing conference, that the attachment sets forth the remaining alleged deficiencies in connection with the Bureau's pending motion to compel.

Maritime offers the following supplemental responses based on the Bureau's document as attached to the Order.

CATEGORY A

The Bureau lists as "Category A" what it says are "Stations For Which Maritime Has Not Provided Any Operational Information." The Bureau's specific requests are set forth below in italics, following by Maritime's numbered further supplemental and/or clarifying responses.

A.1. As to each Call Sign and Location [listed under Category A in the Bureau's table], is it currently operating and offering any type of service?

1. Call Sign KAE889 Locations 3 and 13, are now, and have been since 2008, under lease to the Evergreen School District. Call Sign KAE889, Locations 4, 20, 30, 34 and 48, are now and have been since March 2010, under lease to Puget Sound Energy, Inc. Call Sign WHG750 is now, and has been since February 2010, under lease to Duquesne Light Company. Call Sign WRV374 Locations 15 and 25, are now and have been since 2005, under lease to Pinnacle Wireless, Inc. Call Sign WRV374 Locations 12 & 39 are now and have been since 2003 subject to a spectrum lease with Central Communications Network ("CCN") which later defaulted on its obligations to Maritime. This is discussed further in paragraphs 5 and 6, below. These lessees may over the term of the lease construct and operate "fill-in" stations within the contour footprint of Maritime's authorized incumbent stations. Maritime may not operate from

its licensed location lest it interfere with operations of the lessee. Nevertheless, Maritime reserves the right to resume operations from the authorized locations at such time as the spectrum leases expire or are otherwise terminated.

2. Call Sign WRV374 Location 31 (Baltimore, MD), is subsumed within Call Sign WQGF315, Maritime's geographic (auctioned) AMTS license for the Mid-Atlantic region (Market No. AMT002), and will be voluntarily deleted from the authorization. This facility was inadvertently omitted from the joint stipulations.

3. No service is currently being provided to AMTS users via any of the other facilities on the Bureau's Category A list. Further information regarding the operational status of these facilities is explained below.

4. As reported in prior interrogatory responses, Call Signs WHG703, WHG709, WHG712, WHG714, WHG715, WHG719, WHG720, WHG721, WHG723, WHG725, WHG726, WHG733, WHG734, WHG735, WHG737, WHG741, WHG743, WHG746, WHG751, WHG752 and WRV374 Locations 14, 18, 26 33, 35 & 40 are "operational," meaning that equipment is at the location and the facility is capable of providing AMTS service, even though Maritime currently has no active AMTS customers. Maritime previously reported that it did not know the operational status of Call Signs WHV733 Locations 2, 3 & 5 and WRV374 Location 20. Maritime has since verified that its equipment remains at these locations, and Maritime now also categorizes these facilities as "operational." Maritime does not now and never has intended to permanently cease operations of or otherwise abandon these stations.¹

¹ This information is intended as a factual report and is not a concession of any legal point. It is Maritime's position that these stations are deemed to be "in service" for purposes of Section 1.955(a)(3) of the FCC Rules, notwithstanding the lack of current AMTS subscribers, and/or that any discontinuance of service is temporary, not permanent for purposes of Section 1.955(a)(3).

5. As reported in prior interrogatory responses, Maritime does not know the current operational status of Call Signs KAE889 Locations 6 & 12, WHG702, WHV733 Location 1, WHV843 Location 6, and WRV374 Locations 8, 16, 23 & 34. Maritime previously reported that it did not know the operational status of Call Signs KAE889 Locations 22 & 46, WHG708, WHG710, WHV740, WHV843, and WRV374 Locations 19 & 22. Maritime has since determined that it no longer has operational equipment at these locations, and Maritime now categorizes these facilities as “non-operational.” Regarding Call Sign WRV374 Locations 12 & 39 that are subject to a spectrum lease with CCN, Maritime does not know the current status of the licensed facilities or the fill-in stations constructed by CCN pursuant to the lease. (See paragraph 6, below, for additional information.) As to both the “unknown” and “non-operational” facilities, Maritime does not now and never has intended to permanently cease operations of or otherwise abandon these stations²

A.2. As to any Call Sign and Location [listed under Category A in the Bureau's table] ,... is it currently operating, the date operations ceased and the reason why[?]

6. As stated in prior interrogatory responses, Call Sign WRV374 Locations 12 and 39 are subject to a spectrum lease with CCN that was entered into in 2003 and runs until 2014. CCN defaulted on the lease and Maritime has obtained a \$900,000 monetary judgment against CCN which it has attempted, unsuccessfully thus far, to collect. As reported in previous interrogatory responses, CCN constructed at least 14 fill-in sites within the authorized footprint of the leased stations and loaded them with customers. CCN has apparently abandoned operations under this lease, but Maritime does not know precisely when. Maritime has never

² This information is intended as a factual report and is not a concession of any legal point. It is Maritime's position that, for purposes of Section 1.955(a)(3) of the FCC Rules, even if it is determined that “service” has been “discontinued” on these facilities, such discontinuance is temporary and not permanent.

cancelled the lease. CCN remains in business as a Motorola two way radio sales and service shop and a Sprint Nextel dealer. Maritime hopes to either collect on its judgment and resume services itself, or enforce the lease with CCN; either scenario is possible when MCLM or its successor-in-interest emerges from Chapter 11. As discussed in the preceding response, Call Signs KAE889 Locations 3, 4, 13, 20, 30, 34 & 48, WHG750, and WRV374 Locations 15 & 25 are subject to currently effective spectrum leases pursuant to the Commission's *Secondary Markets* policy³ Finally, as also stated in the preceding response, Call Sign WRV374 Location 31 (Baltimore MD) will be voluntarily deleted from the authorization and is therefore no longer relevant under Issue G.

7. As to the remaining facilities listed in the Bureau's Category A table, Maritime ceased providing AMTS service to end user subscribers as of December 31, 2007. The reason for this was a steady decline in demand for traditional maritime and land mobile communications services via AMTS, and a lack of service revenues, coupled with Maritime's extensive efforts to re-purpose the spectrum for higher and better uses. In particular, Maritime engaged consultants between 2006 and 2008 who researched the feasibility of deploying AMTS spectrum for many new purposes, including: AIS-B Coast Guard vessel tracking, emergency alert nationwide systems, XM Satellite radio's terrestrial wireless transmissions; container tracking in ports and along waterways, Smart Grid, Positive Train Control, and interoperable communications for public safety in conjunction with Maritime's Critical RF subsidiary's technology. Maritime has

³ This information is intended as a factual report and is not a concession of any legal point. It is Maritime's position that, for purposes of Section 1.955(a)(3) of the FCC Rules, a facility subject to spectrum lease pursuant to the Commission's *Secondary Markets* policy— *Principles for Promoting the Efficient Use of Spectrum by Encouraging the Development of Secondary Markets*, WT Docket No. 00-230, *Policy Statement*, 15 FCC Rcd 24178 (2000); *Report and Order and Further Notice of Proposed Rulemaking*, 18 FCC Rcd 20604 (2003); *Second Report and Order, Order on Reconsideration, and Second Further Notice of Proposed Rulemaking*, 19 FCC Rcd 17503 (2004)—is considered to be in "service." See also footnotes 1 & 2, above.

continued efforts it had already begun to repurpose the spectrum to other permitted uses with greater promise of market demand and operational success; this effort is evidenced by the pending sales before the FCC for Smart Grid by customers such as Duquesne Power and Light, data control of pipelines by oil and gas users like EnCana Oil and Gas (USA), Inc., and Enbridge Energy Company, Inc., and Positive Train Control by users such as Southern California Regional Rail Authority. Precisely because it did not intend to permanently abandon these authorizations, Maritime left the legacy, analog equipment in place and, to the extent it was financially able, maintained its site lease and utility payments. Maritime does not now and never has intended to permanently cease operations of, or otherwise abandon, these stations.⁴

A.3. As to each Call Sign and Location [listed under Category A in the Bureau's request], has it been operating and offering any type of service since Maritime's acquisition in 2005? If not, why not?

8. At the time of Maritimes acquisition of the incumbent licenses (December 31, 2005), Call Sign WRV374 Locations 15 and 25 was under lease to Pinnacle Wireless and Call Sign WRV374 Locations 12 & 39 was under lease to CCN. Further details regarding operation of those facilities are discussed in the preceding responses. As also stated in the preceding responses, Call Sign WRV374 Location 31 (Baltimore MD) will be voluntarily deleted from the authorization and is therefore no longer relevant under Issue G.

9. As to the remaining facilities listed in the Bureau's Category A table, at the time of Maritime's acquisition of the incumbent licenses, these stations were operating as part of systems providing maritime and/or land mobile communications services to AMTS subscribers. As previously explained, over the course of the next two years, demand for these services steadily declined as cellular systems became ubiquitous and inexpensive, and as commercial satellite systems such as Globalstar took hold in the long-haul transportation markets for

⁴ See footnote 2, above.

towboats and barges. As of December 31, 2007, Maritime was no longer providing service to AMTS customers via these stations. Maritime does not now and never has intended to permanently cease operations of or otherwise abandon these stations.⁵

CATEGORY B

The Bureau lists as "Category B" Call Signs WHG711 and WHG747 as "Stations For Which Maritime Has Not Provided any Reasons for Service Interruption or Confirmed Earlier Operation." The Bureau's specific requests are set forth below in italics, following by Maritime's further supplemental and/or clarifying responses.

B.1. Was this facility operating and offering any type of service between Maritime's acquisition in 2005 and the Service Suspension Date? If so, what were the dates of operation? If not, why not?

10. The response in paragraph number 9, above, also applies to Call Signs WHG711 and WHG747.

B.2. Why did operations cease by the Service Suspension Date?

11. See the response in paragraph 9, above. The "Service Suspension Dates" actually refer to dates on which these facilities became "non-operational" (see paragraphs 4 and 5, above). Call Sign WHG711 became non-operational in 2008 due to cancellation of the site lease. Call Sign WHG747 became non-operational in May 2010 due to cancellation of electric utilities.

B.3. Have operations resumed? If not, why not?

12. Service has not resumed due to several factors, including insufficient market demand for traditional analog AMTS service, financial difficulties of Maritime due largely to the huge costs of successfully defending itself in California, New Jersey, at the FCC, and elsewhere against the endless litigation brought by Mr. Havens, and the eventual bankruptcy of Maritime.

⁵ See footnote 2, above.

Maritime does not now and never has intended to permanently cease operations of or otherwise abandon these stations.⁶

CATEGORY C

The Bureau lists as “Category C” what it characterizes as “Stations for Which Maritime Has Not Confirmed Earlier Operation.” The Bureau’s specific requests are set forth below in italics, following by Maritime’s further supplemental and/or clarifying responses.

C.1. Was this facility operating and offering any type of service between Maritime’s acquisition in 2005 and the Service Suspension Date? If so, what were the dates of operation? If not, why not?

13. The response in paragraph numbers 9 and 10, above, also applies to the facilities listed in the Bureau’s Category C table, except that Call Signs WGH707 and WHG754 were “non-operational” (see paragraphs 4 and 5, above) at the time of Maritime’s acquisition. As reported in previous interrogatory responses, Call Sign WHG707 became non-operational in 2005. It was also previously reported that Call Sign WHG754 became non-operational in 2011, but this appears to be a clerical error. The tower along the coast of Texas was apparently lost in a hurricane around the year 2000, prior to the acquisition by Maritime.

C.2. Have operations resumed? If not, why not?

14. Service has not resumed due to several factors, including insufficient market demand for AMTS service, financial difficulties of Maritime, and the eventual bankruptcy of Maritime. Maritime does not now and never has intended to permanently cease operations of or otherwise abandon these stations.⁷

⁶ See footnote 2, above.

⁷ See footnote 2, above.

SITE MANAGER CONTACTS

The Order also directed Maritime to “include identification of known point of contact persons” for the Maritime site locations. Maritime will produce this information in a separate filing, subject to confidentiality under the *Protective Order* (FCC 11M-21; rel. July 20, 2011) in this proceeding.

VERIFICATION

Mr. Robert T. Smith, Maritime’s staff engineer, in the principal person with knowledge of the matters discussed herein, and undersigned counsel has consulted with him in the preparation of this document. Mr. Smith is currently out of the office and on the road and will therefore have limited opportunity to carefully review the final version of this document. As soon as Mr. Smith returns to Clarksville, Indiana (location of his Maritime office) and reviews the final version of this document, Maritime will submit his sworn verification together with any minor corrections that may be necessary.

Respectfully Submitted,



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Dated: August 9, 2012

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EXHIBIT 9

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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 Authorizations)	
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Applicant with ENCANA OIL AND GAS (USA), INC.;)	Application File Nos.
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COSERV ELECTRIC; AND SOUTHERN)	
CALIFORNIA REGIONAL RAIL AUTHORITY)	
)	
For Commission Consent to the Assignment of Various)	
Authorizations in the Wireless Radio Services)	

AMENDED AND FURTHER SUPPLEMENTAL
RESPONSE TO INTERROGATORIES

Maritime Communications/Land Mobile, LLC (“Maritime”) hereby respectfully serves this amended and further supplemental response to the *Joint Interrogatories to Maritime Relating to Nonconstruction and Discontinuance of Site-Based Operations*.

Except as otherwise specifically stated herein, this submission supplements and/or clarifies Maritime’s initial response as served on February 6, 2012. This submission supersedes and replaces entirely the supplemental and further supplemental responses as served by Maritime on February 8, 2012, and 28, 2012, respectively. Revised Tables 1 and 2 appended hereto

supersede and replace entirely prior versions included in the initial, supplemental, and further supplemental responses.

Maritime has done its best under very difficult circumstances to provide as much responsive information as it can. As previously and repeatedly explained, Maritime has extremely limited personnel and financial resources—only three employees and no funds available to pay for additional support—and yet is attempting to deal as best it can with this proceeding as well as other administrative, legal, and litigation matters on multiple fronts. In this regard, it is noted that Interrogatory Nos. 11, 12, 14 & 15 seek, *inter alia*, specific time frames for certain past events. In many cases, Maritime does not know this information and may not be able to determine it, and has so stated in these amended and supplemental responses. Maritime is continuing its effort to determine the time periods to the extent that it can, but was not able to do so in time for inclusion in this filing. By close of business on Monday, March 19, 2012 (earlier if possible), Maritime will provide the Bureau with any additional specific time frames it has been able to determine in response to the referenced interrogatories.

5. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station was placed in operation and specify the date when the station was placed in operation.*

The “completion of construction” and “placement into operation” occur simultaneously. Maritime understands that in the AMTS, unlike other services, there is no requirement that a station be actively providing service to any minimum number of subscriber units to be deemed “constructed” or “in operation.” Accordingly, each facility was placed into operation on the date construction was completed. This means that as of that date the station was built, fully operational, and capable of handling two-way traffic, regardless of whether it was actively serving any customer units at the time.

As for those locations listed on Revised Table 2, appended hereto, that indicate construction completion dates in 2001 or later, Maritime makes this statement based, *inter alia*, the knowledge and recollection of Maritime employees who were involved at the time as employees of Mobex. As for the other locations, please refer to Maritime’s response to Interrogatory No. 25 of *Enforcement Bureau’s First Set of Interrogatories to*

Maritime Relating to Nonconstruction and Discontinuance of Site-Based Operations as served by Maritime on March 13, 2012.

To the extent Maritime has been able to document a specific construction completion date, the date is indicated in Revised Table 2 together with a reference to the document production number or Bates page number on which the date is based.

8. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization with a Station for which Maritime has end user customers who are actually paying for and using AMTS services.*

Maritime does not currently have direct end users for AMTS services as such. Pursuant to the Commission's secondary market policies, Maritime leases AMTS spectrum within the authorized footprint service area of its incumbent station licenses to certain entities. Maritime leases spectrum pursuant to the following incumbent facilities:

- Station KAE889, Locations 3 and 6, to the Evergreen School District
- Station KAE889, Locations 4, 20, 30, 34, and 48, to Puget Sound Energy
- Station WRV374, Locations 15 and 25, to Pinnacle Wireless
- Station WRV374, Locations 12 and 39, to CCN
- Station WHG750 to Duquesne Light

In addition to these incumbent locations expressly subject to spectrum leases, Maritime's operations are restricted at other incumbent locations due the need to provide interference protection to lessees of spectrum under geographic licenses. Specific instances are discussed in Maritime's Response to Interrogatories served on March 13, 2012.

11. *Of the authorizations identified in response to Interrogatory No. 10, above, identify any period of time for which any Station was not interconnected.*

Except as otherwise stated in the next paragraph, all stations were interconnected until sometime in 2007. Maritime does not know the exact time in 2007 when interconnection was removed. None of the stations has been interconnected since that time.

Stations KA98625 and WHW848 have never been interconnected. Stations WFN and WRD58 previously had operator-assisted access to the PSTN until sometime in approximately 2002. To the best of Maritime's knowledge, Station WHX877 was never interconnected. Maritime has not yet constructed, and therefore has not established interconnection for, any facilities pursuant to the geographic licenses (WQGF315, WQGF316, WQGF317, and WQGF318).

13. *As to each authorization identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station is currently operating. As to each such authorization, state whether the Station has been in continuous operation and, if not, explain why not.*

For purposes of these interrogatory responses, Maritime considers a station to be operating if: (a) it is fully constructed, operational, and capable of handling two way traffic, regardless of whether it is currently serving end users; and/or (b) the use of spectrum authorized by the licenses has been leased to a third party within the authorized footprint of the station. Table 2, appended hereto, indicates that operational status of the stations. That listing indicates, by the designators L and O, those stations that are currently operational pursuant to spectrum lease or otherwise.

To the best of Maritime's knowledge, and except as specifically disclosed in Revised Table 2, all of the incumbent AMTS were continuously operational from the time of initial construction to at least January of 2006.¹ Maritime has never intentionally terminated operations at any of these stations. Nevertheless, stations may have become temporarily nonoperational at various times after early 2006 due to a combination of factors as previously explained (primarily, inability to meet site lease payments and other obligations). In many instances, notwithstanding these financial difficulties, the stations remained operational—i.e., the facilities remained in place, connected, and fully operational—notwithstanding any financial delinquencies.

It has always been, and remains, Maritime's intention to regularize operations at its stations as financial conditions permit. Thus, in many instances Maritime has renegotiated delinquent or terminated site leases and visited certain sites to verify the operational status of the stations and perform any needed repairs or maintenance. In several of these instances, Maritime discovered that the landlord had left the stations intact. Nevertheless, because of these circumstances described above and various other factors explained and discussed in prior responses to discovery requests, Maritime does not affirmatively know the status of stations that it has not been able to visit in the recent past. Accordingly, for many of the stations on the list, the code U indicates that the status is unknown to Maritime at this time.

Maritime has nonetheless made a good faith effort, within the scope of its limited financial resources, to determine as best it can, the operational status of the listed stations, short of having to physically visit the sites in question, and where it has been able to verify such temporary discontinuance has used a status code of T on Revised Table 2, where # indicates (where known) the reason for temporary discontinuance as explained in the key at the end of the listing.

¹ In Revised Table 2, Maritime indicates (by the use of the status code "T") those incumbent stations that are currently in temporary nonoperational status. While it is believed most of these stations became nonoperational since early 2006 (and some of them very recently) a few of them may have become nonoperational prior to that time. As explained elsewhere, Maritime is attempting, to the best of its ability, to determine more precise time periods and will provide whatever additional information it can to the Bureau as soon as possible.

Finally, the stations listed with the codes G or G1 on Revised Table 2 are licenses for authority that is now wholly subsumed within the scope of Maritime's geographic licenses, and their status is therefore irrelevant to the resolution of issue (g). Because of this, and also given Maritime's extremely limited resources, Maritime has not attempted to verify the status of these facilities.

14. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station has ever discontinued operating for any reason for a continuous period of one year or more. As to each such authorization, (a) specify the date(s) when the Station discontinued operating and, if applicable, when it resumed operating; and (b) explain fully why the Station discontinued operating for a period of one year or more.*

Supplemental Response: For purposes of this response, Maritime considers an "operating" station to be one meeting the conditions set forth in the first paragraph of the response to Interrogatory No. 13, above. Maritime stands by its previous objection to any implication that one year, or any other time period, has any absolute relevance to the designated issue. Maritime also does not concede that the lack of current, active end users or transmissions at a particular location constitutes permanent discontinuance.

Except as otherwise disclosed in the response to Interrogatory No. 14, below, Maritime is not able to provide a discrete, exact timeframe during which particular stations were not operating. Maritime has never made an intentional decision to discontinue operations at any particular station, so that in most cases there was no event promoting the recording of any particular date, except as otherwise disclosed herein. In some cases facilities may have been rendered non-operational, not by Maritime's actions or intent, but by factors and circumstances beyond its control, e.g., termination of utilities for non-payment, removal of facilities by landlords, etc. Such discontinuances are not permanent. Maritime has always intended to cure any monetary delinquencies when able, and has in fact reestablished and resumed operations after periods of temporary discontinuance.

Maritime currently lacks the financial resources and staff to visit or otherwise verify the specific operational status of each of its locations to determine where, when, and for how long there may have been such unintentional, temporary discontinuances. To the extent it has information regarding the operational status of the stations, this is provided in the response to Interrogatory 15, below.

15. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station is currently off the air and not operating. As to each such authorization, explain why and for how long it has been off the air and not operating.*

Please refer to response to Interrogatory No. 14, above, and Revised Table 2.

16. *With respect to each authorization identified in response to Interrogatory No. 1, above, describe the coverage area provided by any Station that was constructed.*

The coverage area for each station is the predicted 38 dB μ contour calculated in accordance with the Commission's applicable standards for this service.

18. *Identify all persons who, on behalf of Maritime, were involved in the following in any manner, at any time, and to any extent whatsoever:*

- a. *constructing any Station associated with any authorization identified in response to Interrogatory No. 1, above;*
- b. *placing in operation any Station associated with any authorization identified in response to Interrogatory No. 1, above;*
- c. *operating or maintaining any Station associated with any authorization identified in response to Interrogatory No. 1, above;*
- d. *discontinuing operations of any Station associated with any authorization identified in response to Interrogatory No. 1, above; and/or*
- e. *entering into any contracts, agreements, arrangements or understanding related to the purchase or lease of equipment and/or of real estate and/or the hiring of personnel involved in the construction and/or placing into operation of any Station associated with any authorization identified in response to Interrogatory No. 1, above.*

Such persons are listed below together with, when available, last known contact information,

Current Maritime personnel: John Reardon (operations manager), Robert T. Smith (engineer), and Sharon Watkins (bookkeeper).

Former Regionet principals and/or personnel:

Fred Daniel (formerly Orion Telecom)
29 Harcourt
Newport Coast CA 92657

Paul vander Heyden (aka Paul Vanderheijden)
Scuderia Topolino
981B Trinity Road
Raleigh, NC 27607
919 842-3880

Gordon Day (Day Wireless)
4700 SE International Way
Milwaukie, OR, 97222
503-659-1240

Former Watercom principals and/or personnel:

John G. Smith
502-592-7074
Jgs4@insightbb.com

David Poe
Engineering Manager
Meade County RECC
1351 Highway 79
Brandenburg, Kentucky 40108
Tel: 270-422-2911

Dwayne Kinard (no information at this time)

Former Mobex principals and/or personnel:

John Reardon, Robert T. Smith, and Sharon Watkins (currently with Maritime)

David Predmore
14037 Baneberry Circle
Manassas, VA 20112

Nancy Krajcar (on information and belief, currently a Teacher in the Mount Diablo Unified School District, California)

Paul vander Heyden (listed in a prior section, above)

Will Greene (no information at this time)

Scott Preston
High Street Partners
222 Severn Avenue
Building 14, Suite 100
Annapolis, MD 21403
410-858-4568

Motorola personnel:

Ken Notter, Motorola
847-576-4322 (work)
630-546-2682

John E. Jaderholm
Senior Business Development Manager
Government & Commercial Markets
System Solutions Team
1303 E. Algonquin Road, 4th Floor
Schaumburg, IL 60196
847-538-0767

Many current and former customers/lessees, including Central Communications Network, Inc., SCR, Inc., Day Wireless, Inc., and Pinnacle Wireless (a party to this proceeding).

An outside contractor was used to construct the initial Watercom system (those incumbent stations with call signs beginning "WHG"). The main contractor was a company called Tracor. On information and belief this is the government contracting firm that is now owned by GE. A subcontractor was US Tower, a firm based in Frederick, Maryland. As stated in a previous supplemental response, this was prior to the time any of the current employees were with the company and Maritime therefore does not have any further details beyond what may be in the documents already produced to the Bureau.

20. *With respect to each authorization identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station was constructed in accordance with the requirements of the relevant license, including geographic coordinates, antenna heights, and other technical parameters included on the license.*

All of them, except such minor variations as were reported to the Commission. For the locations listed on Revised Table 2 including a document production or Bates page number, any reported minor variations are included in the specifically referenced documents. For the other locations, to the best of Maritime's knowledge, but subject to the limitations explained in the response to Interrogatory No. 5, above, Maritime believes in good faith that the facilities were constructed in accordance with the authorizations.

Respectfully Submitted,



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Counsel for Maritime Communications/
Land Mobile, LLC

Email: rjk@telcomlaw.com
Telephone: 202.656.8490
Facsimile: 202.223.2121

Law Offices of Robert J. Keller, P.C.
PO Box 33428
Washington, D.C. 20033

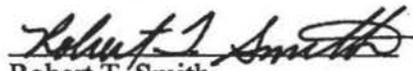
Dated: March 16, 2012

Declaration of Robert T. Smith

I, Robert T. Smith, state that I have assisted in the preparation of and have reviewed a final draft of the amended and supplemental response of Maritime Communications/Land Mobile, LLC to the Joint Interrogatories to Maritime Relating to Nonconstruction and Discontinuance of Site-Based Operations in Federal Communications Commission EB Docket No. 11-71; that I am generally familiar with the factual matters addressed in said response; and that the factual assertions made in the response are, to the best of my knowledge, information, and belief, are 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 16th day of March, 2012.


Robert T. Smith

Revised Table 1 – Page 1 of 2

HDO.A	Call Sign	Original Grant Date	Current Exp. Date	Most Recent Renewal		Previous Renewal
				File Number	Renewed	
1	WQGF315	07-Sep-05	29-Dec-16	N/A	N/A	N/A
2	WQGF316	07-Sep-05	29-Dec-16	N/A	N/A	N/A
3	WQGF317	07-Sep-05	29-Dec-16	N/A	N/A	N/A
4	WQGF318	07-Sep-05	29-Dec-16	N/A	N/A	N/A
5	KA98265	?	07-Aug-12	0000982201	06-Aug-02	?
6	KAE889	1999	07-Sep-14	0001768691	28-Dec-04	N/A
7	KCE278	15-Jul-99	14-Jul-13	0001370847	28-Dec-04	N/A
8	KPB531	15-Jul-99	14-Jul-13	0001370848	28-Dec-04	N/A
9	KUF732	15-Jul-99	14-Jul-13	0001370850	28-Dec-04	N/A
10	WFN	?	13-May-13	0001264766	27-May-03	?
11	WHG693	1991 or earlier?	10-Dec-12	0001082495	02-Jul-03	R998766
12	WHG701	1991 or earlier?	10-Dec-12	0001082496	02-Jul-03	R998720
13	WHG702	1991 or earlier?	10-Dec-12	0001082497	02-Jul-03	R998765
14	WHG703	1991 or earlier?	10-Dec-12	0001082498	02-Jul-03	R998764
15	WHG705	1991 or earlier?	10-Dec-12	0001082499	02-Jul-03	R998763
16	WHG706	1991 or earlier?	10-Dec-12	0001082500	02-Jul-03	R998762
17	WHG707	1991 or earlier?	10-Dec-12	0001082501	02-Jul-03	R998761
18	WHG708	1991 or earlier?	10-Dec-12	0001082502	02-Jul-03	R998719
19	WHG709	1991 or earlier?	10-Dec-12	0001082503	02-Jul-03	R998760
20	WHG710	1991 or earlier?	10-Dec-12	0001082504	02-Jul-03	R998759
21	WHG711	1991 or earlier?	10-Dec-12	0001082505	02-Jul-03	R998758
22	WHG712	1991 or earlier?	10-Dec-12	0001082506	02-Jul-03	R998757
23	WHG713	1991 or earlier?	10-Dec-12	0001082507	02-Jul-03	R998756
24	WHG714	1991 or earlier?	10-Dec-12	0001082508	02-Jul-03	R998755
25	WHG715	1991 or earlier?	10-Dec-12	0001082509	02-Jul-03	R998718
26	WHG716	1991 or earlier?	10-Dec-12	0001082510	02-Jul-03	R998754
27	WHG717	1991 or earlier?	10-Dec-12	0001082511	02-Jul-03	R998753
28	WHG718	1991 or earlier?	10-Dec-12	0001082512	02-Jul-03	R998717
29	WHG719	1991 or earlier?	10-Dec-12	0001082513	02-Jul-03	R998752
30	WHG720	1991 or earlier?	10-Dec-12	0001082514	02-Jul-03	R998751
31	WHG721	1991 or earlier?	10-Dec-12	0001082515	02-Jul-03	R998750
32	WHG722	1991 or earlier?	10-Dec-12	0001082516	02-Jul-03	R998749
33	WHG723	1991 or earlier?	10-Dec-12	0001082517	02-Jul-03	R998748
34	WHG724	1991 or earlier?	10-Dec-12	0001082518	02-Jul-03	R998716
35	WHG725	1991 or earlier?	10-Dec-12	0001082519	02-Jul-03	R998747
36	WHG726	1991 or earlier?	10-Dec-12	0001082520	02-Jul-03	R998746
37	WHG727	1991 or earlier?	10-Dec-12	0001082521	02-Jul-03	R998745

Table 1 – Page 2 of 2

HDO.A	Call Sign	Original Grant Date	Current Exp. Date	Most Recent Renewal		Previous Renewal
				File Number	Renewed	
38	WHG728	1991 or earlier?	10-Dec-12	0001082522	02-Jul-03	R998744
39	WHG729	1991 or earlier?	10-Dec-12	0001082523	02-Jul-03	R998743
40	WHG730	1991 or earlier?	10-Dec-12	0001082524	02-Jul-03	R998715
41	WHG731	1991 or earlier?	10-Dec-12	0001082525	02-Jul-03	R998742
42	WHG732	1991 or earlier?	10-Dec-12	0001082526	02-Jul-03	R998741
43	WHG733	1991 or earlier?	10-Dec-12	0001082527	02-Jul-03	R998740
44	WHG734	1991 or earlier?	10-Dec-12	0001082528	02-Jul-03	R998714
45	WHG735	1991 or earlier?	10-Dec-12	0001082529	02-Jul-03	R998739
46	WHG736	1991 or earlier?	10-Dec-12	0001082530	02-Jul-03	R998738
47	WHG737	1991 or earlier?	10-Dec-12	0001082531	02-Jul-03	R998737
48	WHG738	1991 or earlier?	10-Dec-12	0001082532	02-Jul-03	R998736
49	WHG739	1991 or earlier?	10-Dec-12	0001082533	02-Jul-03	R998735
50	WHG740	1991 or earlier?	10-Dec-12	0001082534	02-Jul-03	R998713
51	WHG741	1991 or earlier?	10-Dec-12	0001082535	02-Jul-03	R998734
52	WHG742	1991 or earlier?	10-Dec-12	0001082536	02-Jul-03	R998733
53	WHG743	1991 or earlier?	10-Dec-12	0001082537	02-Jul-03	R998732
54	WHG744	1991 or earlier?	10-Dec-12	0001082538	02-Jul-03	R998731
55	WHG745	1991 or earlier?	10-Dec-12	0001082539	02-Jul-03	R998730
56	WHG746	1991 or earlier?	10-Dec-12	0001082540	02-Jul-03	R998712
57	WHG747	1991 or earlier?	10-Dec-12	0001082541	02-Jul-03	R998729
58	WHG748	1991 or earlier?	10-Dec-12	0001082542	02-Jul-03	R998728
59	WHG749	1991 or earlier?	10-Dec-12	0001082543	02-Jul-03	R998727
60	WHG750	1991 or earlier?	10-Dec-12	0001082544	02-Jul-03	R998726
61	WHG751	1991 or earlier?	10-Dec-12	0001082545	02-Jul-03	R998725
62	WHG752	1991 or earlier?	10-Dec-12	0001082546	02-Jul-03	R998724
63	WHG753	1991 or earlier?	10-Dec-12	0001082547	02-Jul-03	R998723
64	WHG754	1991 or earlier?	10-Dec-12	0001082548	02-Jul-03	R998722
65	WHV733	?	08-Nov-15	0002363519	30-Jan-07	?
66	WHV740	?	08-Nov-15	0002363520	30-Jan-07	?
67	WHV843	?	08-Nov-15	0002363521	30-Jan-07	?
68	WHW848	?	16-Jun-14	0001768693	11-Jun-04	?
69	WHX877	?	05-Jan-15	0001989848	31-Dec-04	?
70	WRD580	?	23-Sep-13	0001370851	05-Sep-03	?
71	WRV374	30-Nov-98	30-May-11*	0000443747	02-Jul-01	N/A

* current renewal pending, File No. 0004738157

Revised Table 2 – Page 1 of 5

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
KAE889	3	L			30-Sep-99	G_017253	CAMAS	CLARK	WA
	4	L			30-Sep-99	G_017417	RAINIER	THURSTON	WA
	6	U			30-Sep-99	G_017715	SALEM	MARION	OR
	8	G			29-May-99	G_017733	BAKERSFIELD	KERN	CA
	12	O					PHOENIX	JACKSON	OR
	13	L			20-Sep-99	G_018039	PORTLAND	MULTNOMAH	OR
	14	G			26-Feb-98		CORONA	ORANGE	CA
	20	L			29-May-99	G_018374	ORCAS ISLAND	SAN JUAN	WA
	22	U			20-Sep-99	G_018522	EUGENE	LANE	OR
	26	G			20-Sep-99	G_018660	SALINAS	MONTEREY	CA
	27	G					SAN RAFAEL	MARIN	CA
	28	G					WALNUT CREEK	CONTRA COSTA	CA
	30	L			20-Sep-99	G_018962	BREMERTON	JEFFERSON	WA
	33	G			29-May-99	G_019084	LOS GATOS	SANTA CLARA	CA
	34	L			20-Sep-99	G_019195	OLYMPIA	THURSTON	WA
	37	G			29-May-99	G_019323	MODESTO	STANISLAUS	CA
	39	G			29-May-99	G_019481	COALINGA	FRESNO	CA
	40	G			29-May-99	G_019538	PINE VALLEY	SAN DIEGO	CA
44	G			29-May-99	G_019703	PALMDALE	LOS ANGELES	CA	
46	L			20-Sep-99	G_019763	WOODBURN	MARION	OR	
48	L			20-Sep-99	G_019802	SEATTLE	KING	WA	
KCE278	1	G	15-Jul-99	14-Jul-01	25-Jun-01	G_019845 - G_019857	CHARLEVOIX	CHARLEVOIX	MI
	2	G	15-Jul-99	14-Jul-01			ROGERS CITY	PRESQUE ISLE	MI
KPB531	1	G	15-Jul-99	14-Jul-01	21-Jun-01	G_022475 - G_0220476	MUSKEGON	MUSKEGON	MI
	2	G	15-Jul-99	14-Jul-01	6-Jun-01	G_022535 - G_022538	MICHIGAN CITY	LA PORTE	IN
	3	G	15-Jul-99	14-Jul-01	6-Jun-01	G_022582	KENOSHA	KENOSHA	WI
	4	G	15-Jul-99	14-Jul-01	13-Jul-01	G_022669 - G_022671	MILWAUKEE	MILWAUKEE	WI
	5	G	26-May-00	26-May-02	17-May-02	G_022720	LAKE ZURICH	LAKE	IL
WHG693	1	G1, U				VENICE	PLAQUEMINES	LA	
WHG701	1	G1, T1				SANTA ROSA BEACH	WALTON	FL	
WHG702	1	G1, T1				THEODORE	MOBILE	AL	

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WHG703	1	G1, O					DELISLE	HARRISON	MS
WHG705	1	G1, T					AMELIA	ASSUMPTION	LA
WHG706	1	G1, T2					INTRACOASTAL CITY	VERMILION	LA
WHG707	1	G1, T1					PORT ARTHUR	JEFFERSON	TX
WHG708	1	G1, U					DICKINSON	GALVESTON	TX
WHG709	1	G1, O					BAY CITY	MATAGORDA	TX
WHG710	1	G1, U					ARANSAS PASS	SAN PATRICIO	TX
WHG711	1	G1, U					RIVIERA	KLEBERG	TX
WHG712	1	G1, O					JEFFERSON HEIGHTS	JEFFERSON	LA
WHG713	1	G1, T2					CARVILLE	IBERVILLE	LA
WHG714	1	G1, O					REDWOOD	WARREN	MS
WHG715	1	G1, O					WAYSIDE	WASHINGTON	MS
WHG716	1	G1, T2					LAKE CORMORANT	DESOTO	MS
WHG717	1	G1, T2					SAMBURG	OBION	TN
WHG718	1	G1, T2					ALTO PASS	UNION	IL
WHG719	1	G1, O					MADONNAVILLE	MONROE	IL
WHG720	1	G1, O					GRAFTON	JERSEY	IL
WHG721	1	G1, T					SAVERTON	RALLS	MO
WHG722	1	G1, T1					ADRIAN	HANCOCK	IL
WHG723	1	G1, O					REYNOLDS	ROCK ISLAND	IL
WHG724	1	G1, T2					MILES	JACKSON	IA
WHG725	1	G1, O					SHERRILL	DUBUQUE	IA
WHG726	1	G1, T					MIDWAY	MASSAC	IL
WHG727	1	G1, T2					HEBBARDSVILLE	HENDERSON	KY
WHG728	1	G1, 2					ELIZABETH	FLOYD	IN
WHG729	1	G1, T2					BEDFORD	TRIMBLE	KY
WHG730	1	G1, T2					INDEPENDENCE	KENTON	KY
WHG731	1	G1, T2					FAIRVIEW	ADAMS	OH
WHG732	1	G1, T2					LETITIA	GREENUP	KY
WHG733	1	G1, O					GREASY RIDGE	LAWRENCE	OH
WHG734	1	G1, O					MEREDOSIA	MORGAN	IL

Revised Table 2 (rev. 3) – Page 3 of 5

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WHG735	1	G1, O					HANNA CITY	PEORIA	IL
WHG736	1	G1, T2					TONICA	LA SALLE	IL
WHG737	1	G1, O					LOCKPORT	WILL	IL
WHG738	1	G1, T2					FORDS FERRY	CRITTENDEN	KY
WHG739	1	G1, T1					MOOLEYVILLE	BRECKINRIDGE	KY
WHG740	1	G1, T2					BASHAN	MEIGS	OH
WHG741	1	G1, O					BROWNSVILLE	MONROE	OH
WHG742	1	G1, T2					LANSING	ALLAMAKEE	IA
WHG743	1	G1, O					WITOKA	WINONA	MN
WHG744	1	G1, T2					DIAMOND BLUFF	PIERCE	WI
WHG745	1	G1, T1					LAUREL HILL	WEST FELICIANA	LA
WHG746	1	G1, O					PINE RIDGE	ADAMS	MS
WHG747	1	G1, T2					RENA LARA	COAHOMA	MS
WHG748	1	G1, T2					FULTON	LAUDERDALE	TN
WHG749	1	G1, T2					SHADYSIDE	BELMONT	OH
WHG750	1	G1, O					HOOKSTOWN	BEAVER	PA
WHG751	1	G1, O					AVALON BEACH	SANTA ROSA	FL
WHG752	1	G1, O					LAKE CHARLES	CALCASIEU	LA
WHG753	1	G1, T1					PORT LAVACA	CALHOUN	TX
WHG754	1	G1, T1					RAYMONDSVILLE	WILLACY	TX
WHV733	1	U					STOKES COUNTY	STOKES	NC
	2	U					HILLSBOROUGH	ORANGE	NC
	3	U					ROCKFISH	CUMBERLAND	NC
WHV740	2	U				AUGUSTA	RICHMOND	GA	
WHV843	1	U					CEASARS HEAD	GREENVILLE	SC
	5	U					GASTONIA	GASTON	NC
	6	U					LITTLE MOUNTAIN	NEWBERRY	SC
KA98265	Mobile	N/A			N/A	handhelds nr Mississippi & tributaries			
WFN	VHF/HF	U				VHF & HF Jeffersonville/Lanesville IN			
WHX877	HF	U				HF Jeffersonville IN			

Revised Table 2 (rev. 3) – Page 4 of 5

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WQGF315	Geo	A	07-Sep-05		N/A		AMT002 - Mid-Atlantic		
WQGF316	Geo	A	07-Sep-05		N/A		AMT004 - Mississippi River		
WQGF317	Geo	A	07-Sep-05		N/A		AMT005 - Great Lakes		
WQGF318	Geo	A	07-Sep-05		N/A		AMT006 - Southern Pacific		
WRD580	VHF/HF	U					VHF & HF @ Milton KY		
WHW848	1	G			N/A		itenrant/mobile		IN
WRV374	2	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MANASSAS	PR. WILLIAM	VA
	3	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	PHILADELPHIA	PHILADELPHIA	PA
	8	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MANGONIA PARK	PALM BEACH	FL
	12	L	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	ORLANDO	ORANGE	FL
	14	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	SELDEN	SUFFOLK	NY
	15	L	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	VERONA	ESSEX	NJ
	16	T	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	ALLENTOWN	LEHIGH	PA
	17	G	15-Jul-99	14-Jul-01	5-Jul-01	RJK_31	WINTERTHUR	NEW CASTLE	DE
	18	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	VALHALLA	WESTCHESTER	NY
	19	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MIAMI	MIAMI-DADE	FL
	20	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	RAYMOND	CUMBERLAND	ME
	22	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	SPAULDING	DUVAL	FL
	23	U	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	CHARLESTON	CHARLESTON	SC
	24	G	03-Feb-99	02-Feb-01	29-Nov-00	RJK_31	CONWAY	HORRY	SC
	25	L	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	PERRINVILLE	MONMOUTH	NJ
	26	O	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	SAVANNAH	CHATHAM	GA
	27	G	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	NAVASSA	BRUNSWICK	NC
	28	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	SUFFOLK	SUFFOLK	VA
	29	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	RICHMOND	RICHMOND	VA
	31	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	BALTIMORE		MD
33	O	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	NEW YORK	NEW YORK	NY	
34	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	FAJARDO	FAJARDO	PR	
35	O	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	REHOBETH	BRISTOL	MA	
36	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	NEW BERN	CARTERET	NC	
39	L	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	CLEARWATER	PINELLAS	FL	
40	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	HAMDEN	NEW HAVEN	CT	

Revised Table 2 (rev. 3) – Page 5 of 5

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
KUF732	1	G	15-Jul-99	14-Jul-01	30-Jun-01	G_022896	ROCHESTER	MONROE	NY
	2	G	24-Aug-99	23-Aug-01	6-Jun-01	G_022928 - G_022931	SYRACUSE	ONONDAGA	NY
	3	G	15-Jul-99	14-Jul-01	25-Jun-01	G_023050 - G_023052	TOLEDO	OTTAWA	OH
	4	G	15-Jul-99	14-Jul-01			DETROIT	WAYNE	MI
	5	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023143 - G_023145	BUFFALO	ERIE	NY
	6	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023222 - G_023224	ERIE	ERIE	PA
	7	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023254 - G_023256	CLEVELAND	CUYAHOGA	OH

Key to Status Codes

- G Station subsumed within geographic license obtained in auction; status of incumbent license not relevant.
- G1 Channel Block A as to all of the WHG licenses are subsumed within geographic license obtained in auction. Second code stated applies to Channel Block B.
- L Station subject to a spectrum lease.
- O Station constructed and operational; some rents and other obligations may be in arrears since bankruptcy.
- T Station temporarily off the air (T1 = loss of tower, site, etc.(various dates; T2 = utilities terminated for non-payment (2010 & early 2011)
- U Maritime not sure of current operational status.

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of March, 2012, I caused copies of the foregoing pleading to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

Pamela A. Kane, Deputy Chief
Brian Carter, Esquire
Investigations and Hearing Division
Enforcement Bureau
Federal Communications Commission
445 Twelfth Street NW – Room 4-C330
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1300 N Street – Eleventh Floor
Arlington, Virginia 22209



Robert J. Keller
Counsel for Maritime
Communications/Land Mobile, LLC

EXHIBIT 10

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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 Authorizations)	
in the Wireless Radio Services;)	
)	
Applicant with ENCANA OIL AND GAS (USA), INC.;)	Application File Nos.
DUQUESNE LIGHT COMPANY; DCP)	0004030479, 0004144435,
MIDSTREAM, LP; JACKSON COUNTY RURAL)	0004193028, 0004193328,
MEMBERSHIP ELECTRIC COOPERATIVE; PUGET)	0004354053, 0004309872,
SOUND ENERGY, INC.; ENBRIDGE ENERGY)	0004310060, 0004314903,
COMPANY, INC.; INTERSTATE POWER AND)	0004315013, 0004430505,
LIGHT COMPANY; WISCONSIN POWER AND)	0004417199, 0004419431,
LIGHT COMPANY; DIXIE ELECTRIC)	0004422320, 0004422329,
MEMBERSHIP CORPORATION, INC.; ATLAS)	0004507921, 0004153701,
PIPELINE—MID CONTINENT, LLC; DENTON)	0004526264, 0004636537,
COUNTY ELECTRIC COOPERATIVE, INC., DBA)	and 0004604962
COSERV ELECTRIC; AND SOUTHERN)	
CALIFORNIA REGIONAL RAIL AUTHORITY)	
)	
For Commission Consent to the Assignment of Various)	
Authorizations in the Wireless Radio Services)	

ERRATA AND ADDITIONAL INFORMATION REGARDING
AMENDED AND FURTHER SUPPLEMENTAL
RESPONSE TO INTERROGATORIES

Maritime Communications/Land Mobile, LLC (“Maritime”) hereby respectfully provides this errata and additional information regarding its *Amended and Further Supplemental Response to Interrogatories* that were served on March 16, 2012 (“*Amended Response*”).

As there in the *Amended Response*, Maritime was in the process of attempting insofar as able to determine more specific time periods related to its answers. In Revised Table 2, Maritime indicated that operations at a number of its station had been temporarily suspended, as indicate

by a "T" status code. (By way of errata, the attached version (rev. 4) of Revised Table 2 has corrected the status codes for WHG693, WHG702, WHG705, WHG721, WHG726, WHG728, and Loc. 16 of WRV374.) Table 3, below, provides the date that such operations were terminated.

Table 3 (Dates of Temporary Suspension of Operations)

Call Sign	Loc	Status	Temporarily Suspended	Reason for Suspension	City	County	ST
WHG693	1	G1, T1	2005	lost tower or site	VENICE	PLAQUEMINES	LA
WHG701	1	G1, T1	2004	lost tower or site	SANTA ROSA BEACH	WALTON	FL
WHG705	1	G1, T2	Apr 2010	utilities disconnected	AMELIA	ASSUMPTION	LA
WHG706	1	G1, T2	Mar 2009	utilities disconnected	INTRACOASTAL CITY	VERMILION	LA
WHG707	1	G1, T1	2005	lost tower or site	PORT ARTHUR	JEFFERSON	TX
WHG713	1	G1, T2	Jan 2011	utilities disconnected	CARVILLE	IBERVILLE	LA
WHG716	1	G1, T2	Sep 2010	utilities disconnected	LAKE CORMORANT	DESOTO	MS
WHG717	1	G1, T2	Aug 2010	utilities disconnected	SAMBURG	OBION	TN
WHG718	1	G1, T2	Apr 2010	utilities disconnected	ALTO PASS	UNION	IL
WHG722	1	G1, T1	May 2011	lost tower or site	ADRIAN	HANCOCK	IL
WHG724	1	G1, T2	Jan 2011	utilities disconnected	MILES	JACKSON	IA
WHG728	1	G1, T	Aug 2011	utilities disconnected	Elizabeth	FLOYD	IN
WHG727	1	G1, T2	May 2010	utilities disconnected	HEBBARDSVILLE	HENDERSON	KY
WHG729	1	G1, T2	Dec 2010	utilities disconnected	BEDFORD	TRIMBLE	KY
WHG730	1	G1, T2	Sep 2010	utilities disconnected	INDEPENDENCE	KENTON	KY
WHG731	1	G1, T2	Mar 2010	utilities disconnected	FAIRVIEW	ADAMS	OH
WHG732	1	G1, T2	Mar 2010	utilities disconnected	LETITIA	GREENUP	KY
WHG736	1	G1, T2	Oct 2011	utilities disconnected	TONICA	LA SALLE	IL
WHG738	1	G1, T2	Feb 2010	utilities disconnected	FORDS FERRY	CRITTENDEN	KY
WHG739	1	G1, T1	Aug 2011	lost tower or site	MOOLEYVILLE	BRECKINRIDGE	KY
WHG740	1	G1, T2	Jan 2010	utilities disconnected	BASHAN	MEIGS	OH
WHG742	1	G1, T2	May 2010	utilities disconnected	LANSING	ALLAMAKEYE	IA
WHG744	1	G1, T2	May 2010	utilities disconnected	DIAMOND BLUFF	PIERCE	WI
WHG745	1	G1, T1	2010	lost tower or site	LAUREL HILL	WEST FELICIANA	LA
WHG748	1	G1, T2	Jul 2010	utilities disconnected	FULTON	LAUDERDALE	TN
WHG749	1	G1, T2	Mar 2010	utilities disconnected	SHADYSIDE	BELMONT	OH
WHG753	1	G1, T1	Oct 2009	lost tower or site	PORT LAVACA	CALHOUN	TX
WHG754	1	G1, T1	Aug 2011	lost tower or site	RAYMONDSVILLE	WILLACY	TX

With regard to interconnection, Maritime terminated interconnection capability at all of its stations sometime in the mid to latter part of 2007 after having been advised by regulatory counsel that it was no longer required. None of the stations has been interconnected since that time. Facilities operated by spectrum lessees, however, may be interconnected.

Finally, it has come to the attention of undersigned counsel that tables appended to the *Amended Response* were inadvertently omitted from the paper copies as served by mail. (The tables were, however, in the electronically filed version and in the electronic courtesy copies.) A copy of the Amended Response, including the tables, will be served along with this filing.

Respectfully Submitted,



Robert J. Keller
Counsel for Maritime Communications/
Land Mobile, LLC

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Telephone: 202.656.8490
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Law Offices of Robert J. Keller, P.C.
PO Box 33428
Washington, D.C. 20033

Dated: March 19, 2012

Revised Table 2 – Page 1 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
KAE889	3	L			30-Sep-99	G_017253	CAMAS	CLARK	WA
	4	L			30-Sep-99	G_017417	RAINIER	THURSTON	WA
	6	U			30-Sep-99	G_017715	SALEM	MARION	OR
	8	G			29-May-99	G_017733	BAKERSFIELD	KERN	CA
	12	O					PHOENIX	JACKSON	OR
	13	L			20-Sep-99	G_018039	PORTLAND	MULTNOMAH	OR
	14	G			26-Feb-98		CORONA	ORANGE	CA
	20	L			29-May-99	G_018374	ORCAS ISLAND	SAN JUAN	WA
	22	U			20-Sep-99	G_018522	EUGENE	LANE	OR
	26	G			20-Sep-99	G_018660	SALINAS	MONTEREY	CA
	27	G					SAN RAFAEL	MARIN	CA
	28	G					WALNUT CREEK	CONTRA COSTA	CA
	30	L			20-Sep-99	G_018962	BREMERTON	JEFFERSON	WA
	33	G			29-May-99	G_019084	LOS GATOS	SANTA CLARA	CA
	34	L			20-Sep-99	G_019195	OLYMPIA	THURSTON	WA
	37	G			29-May-99	G_019323	MODESTO	STANISLAUS	CA
	39	G			29-May-99	G_019481	COALINGA	FRESNO	CA
	40	G			29-May-99	G_019538	PINE VALLEY	SAN DIEGO	CA
44	G			29-May-99	G_019703	PALMDALE	LOS ANGELES	CA	
46	L			20-Sep-99	G_019763	WOODBURN	MARION	OR	
48	L			20-Sep-99	G_019802	SEATTLE	KING	WA	
KCE278	1	G	15-Jul-99	14-Jul-01	25-Jun-01	G_019845 - G_019857	CHARLEVOIX	CHARLEVOIX	MI
	2	G	15-Jul-99	14-Jul-01			ROGERS CITY	PRESQUE ISLE	MI
KPB531	1	G	15-Jul-99	14-Jul-01	21-Jun-01	G_022475 - G_0220476	MUSKEGON	MUSKEGON	MI
	2	G	15-Jul-99	14-Jul-01	6-Jun-01	G_022535 - G_022538	MICHIGAN CITY	LA PORTE	IN
	3	G	15-Jul-99	14-Jul-01	6-Jun-01	G_022582	KENOSHA	KENOSHA	WI
	4	G	15-Jul-99	14-Jul-01	13-Jul-01	G_022669 - G_022671	MILWAUKEE	MILWAUKEE	WI
	5	G	26-May-00	26-May-02	17-May-02	G_022720	LAKE ZURICH	LAKE	IL
WHG693	1	G1, T1				VENICE	PLAQUEMINES	LA	
WHG701	1	G1, T1				SANTA ROSA BEACH	WALTON	FL	
WHG702	1	G1, U				THEODORE	MOBILE	AL	

Revised Table 2 – Page 2 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WHG703	1	G1, O					DELISLE	HARRISON	MS
WHG705	1	G1, T2					AMELIA	ASSUMPTION	LA
WHG706	1	G1, T2					INTRACOASTAL CITY	VERMILION	LA
WHG707	1	G1, T1					PORT ARTHUR	JEFFERSON	TX
WHG708	1	G1, U					DICKINSON	GALVESTON	TX
WHG709	1	G1, O					BAY CITY	MATAGORDA	TX
WHG710	1	G1, U					ARANSAS PASS	SAN PATRICIO	TX
WHG711	1	G1, U					RIVIERA	KLEBERG	TX
WHG712	1	G1, O					JEFFERSON HEIGHTS	JEFFERSON	LA
WHG713	1	G1, T2					CARVILLE	IBERVILLE	LA
WHG714	1	G1, O					REDWOOD	WARREN	MS
WHG715	1	G1, O					WAYSIDE	WASHINGTON	MS
WHG716	1	G1, T2					LAKE CORMORANT	DESOTO	MS
WHG717	1	G1, T2					SAMBURG	OBION	TN
WHG718	1	G1, T2					ALTO PASS	UNION	IL
WHG719	1	G1, O					MADONNAVILLE	MONROE	IL
WHG720	1	G1, O					GRAFTON	JERSEY	IL
WHG721	1	G1, O					SAVERTON	RALLS	MO
WHG722	1	G1, T1					ADRIAN	HANCOCK	IL
WHG723	1	G1, O					REYNOLDS	ROCK ISLAND	IL
WHG724	1	G1, T2					MILES	JACKSON	IA
WHG725	1	G1, O					SHERRILL	DUBUQUE	IA
WHG726	1	G1, O					MIDWAY	MASSAC	IL
WHG727	1	G1, T2					HEBBARDSVILLE	HENDERSON	KY
WHG728	1	G1, T2					ELIZABETH	FLOYD	IN
WHG729	1	G1, T2					BEDFORD	TRIMBLE	KY
WHG730	1	G1, T2					INDEPENDENCE	KENTON	KY
WHG731	1	G1, T2					FAIRVIEW	ADAMS	OH
WHG732	1	G1, T2					LETITIA	GREENUP	KY
WHG733	1	G1, O					GREASY RIDGE	LAWRENCE	OH
WHG734	1	G1, O					MEREDOSIA	MORGAN	IL

Revised Table 2 – Page 3 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WHG735	1	G1, O					HANNA CITY	PEORIA	IL
WHG736	1	G1, T2					TONICA	LA SALLE	IL
WHG737	1	G1, O					LOCKPORT	WILL	IL
WHG738	1	G1, T2					FORDS FERRY	CRITTENDEN	KY
WHG739	1	G1, T1					MOOLEYVILLE	BRECKINRIDGE	KY
WHG740	1	G1, T2					BASHAN	MEIGS	OH
WHG741	1	G1, O					BROWNSVILLE	MONROE	OH
WHG742	1	G1, T2					LANSING	ALLAMAKEE	IA
WHG743	1	G1, O					WITOKA	WINONA	MN
WHG744	1	G1, T2					DIAMOND BLUFF	PIERCE	WI
WHG745	1	G1, T1					LAUREL HILL	WEST FELICIANA	LA
WHG746	1	G1, O					PINE RIDGE	ADAMS	MS
WHG747	1	G1, T2					RENA LARA	COAHOMA	MS
WHG748	1	G1, T2					FULTON	LAUDERDALE	TN
WHG749	1	G1, T2					SHADYSIDE	BELMONT	OH
WHG750	1	G1, O					HOOKSTOWN	BEAVER	PA
WHG751	1	G1, O					AVALON BEACH	SANTA ROSA	FL
WHG752	1	G1, O					LAKE CHARLES	CALCASIEU	LA
WHG753	1	G1, T1					PORT LAVACA	CALHOUN	TX
WHG754	1	G1, T1					RAYMONDSVILLE	WILLACY	TX
WHV733	1	U					STOKES COUNTY	STOKES	NC
	2	U					HILLSBOROUGH	ORANGE	NC
	3	U					ROCKFISH	CUMBERLAND	NC
WHV740	2	U				AUGUSTA	RICHMOND	GA	
WHV843	1	U					CEASARS HEAD	GREENVILLE	SC
	5	U					GASTONIA	GASTON	NC
	6	U					LITTLE MOUNTAIN	NEWBERRY	SC
KA98265	Mobile	N/A			N/A	handhelds nr Mississippi & tributaries			
WFN	VHF/HF	U				VHF & HF Jeffersonville/Lanesville IN			
WHX877	HF	U				HF Jeffersonville IN			

Revised Table 2 – Page 4 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WRV374	2	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MANASSAS	PR. WILLIAM	VA
	3	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	PHILADELPHIA	PHILADELPHIA	PA
	8	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MANGONIA PARK	PALM BEACH	FL
	12	L	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	ORLANDO	ORANGE	FL
	14	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	SELDEN	SUFFOLK	NY
	15	L	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	VERONA	ESSEX	NJ
	16	U	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	ALLENTOWN	LEHIGH	PA
	17	G	15-Jul-99	14-Jul-01	5-Jul-01	RJK_31	WINTERTHUR	NEW CASTLE	DE
	18	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	VALHALLA	WESTCHESTER	NY
	19	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	MIAMI	MIAMI-DADE	FL
	20	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	RAYMOND	CUMBERLAND	ME
	22	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	SPAULDING	DUVAL	FL
	23	U	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	CHARLESTON	CHARLESTON	SC
	24	G	03-Feb-99	02-Feb-01	29-Nov-00	RJK_31	CONWAY	HORRY	SC
	25	L	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	PERRINVILLE	MONMOUTH	NJ
	26	O	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	SAVANNAH	CHATHAM	GA
	27	G	03-Feb-99	02-Feb-01	31-Jan-01	RJK_31	NAVASSA	BRUNSWICK	NC
	28	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	SUFFOLK	SUFFOLK	VA
	29	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	RICHMOND	RICHMOND	VA
	31	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	BALTIMORE		MD
33	O	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	NEW YORK	NEW YORK	NY	
34	U	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	FAJARDO	FAJARDO	PR	
35	O	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	REHOBETH	BRISTOL	MA	
36	G	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	NEW BERN	CARTERET	NC	
39	L	30-Nov-98	29-Nov-00	29-Nov-00	RJK_31	CLEARWATER	PINELLAS	FL	
40	O	15-Jul-99	14-Jul-01	6-Jun-01	RJK_31	HAMDEN	NEW HAVEN	CT	
WQGF315	Geo	A	07-Sep-05		N/A		AMT002 - Mid-Atlantic		
WQGF316	Geo	A	07-Sep-05		N/A		AMT004 - Mississippi River		
WQGF317	Geo	A	07-Sep-05		N/A		AMT005 - Great Lakes		
WQGF318	Geo	A	07-Sep-05		N/A		AMT006 - Southern Pacific		

Revised Table 2 – Page 5 (per 03/19/2012 Errata)

Call Sign	Loc	Status	Date Granted	Construction Deadline	Construction Completed	Doc. Ref.	City	County	ST
WRD580	VHF/HF	U					VHF & HF @ Milton KY		
WHW848	1	G			N/A		Itinerant/mobile		IN
KUF732	1	G	15-Jul-99	14-Jul-01	30-Jun-01	G_022896	ROCHESTER	MONROE	NY
	2	G	24-Aug-99	23-Aug-01	6-Jun-01	G_022928 - G_022931	SYRACUSE	ONONDAGA	NY
	3	G	15-Jul-99	14-Jul-01	25-Jun-01	G_023050 - G_023052	TOLEDO	OTTAWA	OH
	4	G	15-Jul-99	14-Jul-01			DETROIT	WAYNE	MI
	5	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023143 - G_023145	BUFFALO	ERIE	NY
	6	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023222 - G_023224	ERIE	ERIE	PA
	7	G	15-Jul-99	14-Jul-01	30-Jun-01	G_023254 - G_023256	CLEVELAND	CUYAHOGA	OH

Key to Status Codes

- G Station subsumed within geographic license obtained in auction; status of incumbent license not relevant.
- G1 Channel Block A as to all of the WHG licenses are subsumed within geographic license obtained in auction. Second code stated applies to Channel Block B.
- L Station subject to a spectrum lease.
- O Station constructed and operational; some rents and other obligations may be in arrears since bankruptcy.
- T Station temporarily off the air (T1 = loss of tower, site, etc.; T2 = utilities terminated for non-payment). See Table 3 for dates.
- U Maritime not sure of current operational status.

Declaration of Robert T. Smith

I, Robert T. Smith, state that I have assisted in the preparation of and have reviewed a final draft of the ERRATA AND ADDITIONAL INFORMATION REGARDING AMENDED AND FURTHER SUPPLEMENTAL RESPONSE TO INTERROGATORIES being filed in Federal Communications Commission EB Docket No. 11-71; that I am generally familiar with the factual matters addressed in said response; and that the factual assertions made in the response are, to the best of my knowledge, information, and belief, are 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 ___ day of March, 2012.

Robert T. Smith

NOTE: Mr. Smith is currently on the road and unable to print and sign this declaration today. He has, however, reviewed the final draft of the foregoing document and has orally verified it to counsel. An executed copy of this declaration will be submitted upon receipt by counsel.

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of March, 2012, I caused copies of the foregoing pleading to be served, by U.S. Postal Service, First Class postage prepaid, on the following:

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EXHIBIT 11

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 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.;)	Application File Nos.
DUQUESNE LIGHT COMPANY; DCP)	0004030479, 0004144435,
MIDSTREAM, LP; JACKSON COUNTY RURAL)	0004193028, 0004193328,
MEMBERSHIP ELECTRIC COOPERATIVE; PUGET)	0004354053, 0004309872,
SOUND ENERGY, INC.; ENBRIDGE ENERGY)	0004310060, 0004314903,
COMPANY, INC.; INTERSTATE POWER AND)	0004315013, 0004430505,
LIGHT COMPANY; WISCONSIN POWER AND)	0004417199, 0004419431,
LIGHT COMPANY; DIXIE ELECTRIC)	0004422320, 0004422329,
MEMBERSHIP CORPORATION, INC.; ATLAS)	0004507921, 0004153701,
PIPELINE—MID CONTINENT, LLC; DENTON)	0004526264, 0004636537,
COUNTY ELECTRIC COOPERATIVE, INC., DBA)	and 0004604962
COSERV ELECTRIC; AND SOUTHERN)	
CALIFORNIA REGIONAL RAIL AUTHORITY)	
)	
For Commission Consent to the Assignment of Various Authorizations in the Wireless Radio Services)	

RESPONSE TO INTERROGATORIES

Maritime Communications/Land Mobile, LLC (“Maritime”) hereby respectfully tenders these responses to the *Joint Interrogatories to Maritime Relating to Nonconstruction and Discontinuance of Site-Based Operations*.

RESPONSE TO INTERROGATORIES

1. Identify by (a) call sign, (b) location, (c) date of grant, and (d) date of expiration, each site-based authorization of which Maritime is currently the licensee or is listed in the FCC's Universal Licensing System as the licensee, including, but not limited to, each site-based authorization that Maritime acquired from Mobex.

Table 1.1 appended hereto is a list of the current authorizations held by Maritime Communications/Land Mobile, LLC (“Maritime”), showing the expiration date for each call sign and, where such can be readily determined, the original date of grant. For many

of these licenses the original grant date cannot be readily determined from official records or other data.

The first column in this table is a number that corresponds to the number of the authorization as listed in Appendix A to the hearing designation order in this case. The stations were licensed before conversion to the Uniform Licensing System ("ULS") and the original grant data does not seem to be reflected online. Additional information may be contained in various site files currently being reproduced in connection with the outstanding document production request. Maritime will review these documents when they are retrieved and will supplement this response if any such identifying data is discovered. Some information responsive to this request is found in Table No. 2, discussed in the response to Interrogatory No. 2, below.

2. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which construction of a Station was completed, identifying the date(s) when (a) construction of the Station commenced and (b) construction was completed.*

Table 2 appended hereto is a listing by call sign and location number for each of the stations listed in Table 1. To the extent Maritime has been able to determine it, this table also gives the construction deadline and completion dates. As stated in response to Interrogatory No. 1, however, much of this information is quite old and not readily available. The vast majority of these stations were authorized and constructed long before (many of them ten or fifteen years before) Mobex Network Services, LLC ("Mobex") acquired them from Regionet Wireless License, LLC ("Regionet") and Waterway Communication System, LLC ("Watercom") in 2000. All of them were granted and constructed long before Maritime acquired them from Mobex in 2005. As shown in the table, moreover, many of these stations have been through multiple renewal terms. Nevertheless, where specific information is available, it has been included in the table.

Maritime lacks sufficient data to determine the date construction was "commenced" on each of these facilities. In general, however, physical construction itself (exclusive of site lease negotiations and related preparatory work) takes about two weeks in most cases. On information and belief, construction of each of the listed facilities was completed within the applicable construction deadline, even where the exact dates are unknown. In any event, construction of all of these facilities was complete many years, and in many cases a decade or more, prior to Maritime's acquisition of the licenses, and by entities other than and unrelated to Maritime.

Maritime has tried to be as responsive as available data allows. As the licensing authority, the Commission may have access in its paper files to additional information on original grant dates beyond what is routinely available to public inspection.

3. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which construction of a Station was commenced but*

never completed. As to each such authorization (a) specify the date when construction of the Station commenced; (b) specify the date when construction of the Station ceased; and (c) explain fully why construction of the Station was never completed.

None.

4. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which construction of a Station was never commenced, and explain fully why construction was never commenced.*

None.

5. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station was placed in operation and specify the date when the station was placed in operation.*

Each facility was placed into operation on the date construction was completed.

6. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station was constructed but never placed in operation, and explain why a Station was never placed in operation.*

None.

7. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station was constructed, but equipment or components were subsequently removed from that Station.*

No equipment has been removed from any site with the intention of permanently discontinuing operations. See the response to Interrogatory No. 14, below. As explained there and elsewhere, Maritime's active service of customers may have curtailed and payment of site leases and utilities fell into arrears, but even then equipment was not removed by Maritime. In many cases when Maritime later renegotiated leases and returned to reactivate the sites, it was found that the equipment had been left in place by the tower owner. Maritime may have, from time to time, temporarily removed equipment from a particular site, but this would have been for some specific purpose, and not an indication of permanent abandonment.

8. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization with a Station for which Maritime has end user customers who are actually paying for and using AMTS services.*

Maritime leases spectrum in New Jersey to Pinnacle Wireless for use by the New Jersey Turnpike, Garden State Parkway, and the Meadowlands (Giants Stadium, etc) complex. All sites in New Jersey are impacted by this lease.

Maritime leases spectrum in southern Washington State to Evergreen School District.

Maritime leases spectrum in several markets to Spectrum Tracking Systems, including Los Angeles, Dallas, Houston, Birmingham, and Little Rock. These sites are impacted.

Maritime leases spectrum to Central Communications Network in Orlando. The Tampa, Orlando and central Florida sites are impacted by this lease. CCN is in default and Maritime has a judgment against CCN for \$900K in damages. Maritime has not cancelled this lease, is pursuing collection of the judgment, and intends to reactivate operations pursuant to this license in the future.

Maritime has several leases in place around the nation with its purchasers under the Asset Purchase Agreements pending before the FCC. Maritime gets paid an annual fee for use of these licenses. Users have built systems or are in the process of building them, and are using MCLM spectrum for two-way radio communications, Smart Grid, and Positive Train Control, among other uses.

Such paying customers include: (1) Duquesne Power and Light in; (2) EnCana Oil and Gas in Louisiana and Texas; (3) Enbridge in Texas and Louisiana; (4) DCP Midstream in Louisiana; (5) Dixie Electric in seven parishes in Louisiana; (6) Questar Market Resources in Oklahoma; (7) Puget Sound Energy in Washington State; (8) Alliant Energy in Wisconsin, Iowa and Illinois; (9) Shenandoah Electric in Virginia; (10) Rappahannock Electric in Virginia; (11) CoServ in Dallas/Ft. Worth, Texas; and (12) Jackson County Rural Electric in Indiana.

In addition, Maritime within the past year received payment and leased spectrum for testing purposes to several users, including Progress Energy in North and South Carolina, Central Virginia Electric Cooperative in central Virginia, and others whom Maritime prefers not to disclose to our competitor Warren Havens at this time, for obvious reasons of not wanting to lose future business.

9. *Pursuant to Sections 20.9(a)(5) and 20.3 of the Rules, as well as Request for Review by Waterway Communication System, LLC and Mobex Network Services, LLC of a Decision of the Universal Service Administrator, Order, 23 FCC Rcd 12836, ¶ 4 (WCB 2008), of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization with a Station that is interconnected, as that term is defined in Section 20.3 of the Rules.*

None of the stations is currently interconnected; the previous requirement to provide interconnect capability no longer exists under FCC rules.

10. *Of the authorizations identified in response to Interrogatory No. 9, above, explain how interconnection is accomplished.*

None of the stations is currently interconnected, but please see the response to Interrogatory No. 11, below.

11. *Of the authorizations identified in response to Interrogatory No. 10, above, identify any period of time for which any Station was not interconnected.*

For the stations previously licensed to Watercom (those with call signs beginning "WHG") there were multiple telephone lines into a modem and switch as teach transmitter site. Each mobile unit on a vessel had an 812 (area code for southern Indiana) number assigned to it, and each base station also had an "overdial" 812 number assigned to it. There was a control site at Jeffersonville, Indiana. A call from the PSTN to a ship's 812 phone number was routed to the base station closest to the location of the ship being called. Alternatively, if the location of the ship was known, the caller could call the appropriate over-dial number and then enter a code for the particular mobile unit. Calls originated from the ship were routed by the closest base station to the PSTN.

The other stations all used interconnection arrangements more typical of land-mobile systems. The Regionet stations on the West Coast used the MPT-1327 protocol. The "Passport" system was implemented in New York City, Philadelphia, Baltimore, and Chicago. The remaining systems used the LTR format. These stations were all capable of providing interconnected service, but it was not actively marketed. Maritime found that the majority of its two-way mobile radio users did not want to pay additional for interconnect. Now, with its data customers in the Smart Grid and PTC environments, voice calls are outdated. Data communications are the primary driver of growth, and these machine to machine communications do not need voice interconnection to the PSTN. That is a thing of the past.

In 2007, Maritime was advised by regulatory counsel that interconnection was no longer required.

12. *Identify each Station that was placed in operation more than two years after grant of the authorization for the Station and for each such Station, explain why the Station was placed in operation more than two years after grant of the authorization for the Station.*

Except as stated in the following paragraph, none.

The initial construction deadline for Location Nos. 5 and 6 of Station WHV843 was November 9, 2002. Construction of these facilities was completed on or before that date, but at different locations. The initially authorized sites were unavailable due to circumstances beyond the control of Mobex, then the licensee. Mobex timely filed

applications for extension of time to construct, for modification to relocate these facilities, and for an STA pending final action on the modification application. Construction was completed on or before November 8, 2002, pursuant to an STA granted by the Commission. See FCC File Nos. 0001060314, 0001085521 & 0001293111.

13. *As to each authorization identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station is currently operating. As to each such authorization, state whether the Station has been in continuous operation and, if not, explain why not.*

Maritime will require slightly more time to provide a full response to this interrogatory. The process of compiling this information has been delayed somewhat by unavailability of files that are at the printer being scanned in connection with document production. Within two days, Maritime will provide a tentative listing the status of each site, subject to being verified once it has access to files. Except as may be further stated in such supplemental response, as to the reason for any hiatus in continuous operation, see the response to Interrogatory No. 14, below.

14. *Of the authorizations identified in response to Interrogatory No. 1, above, identify by call sign and location each authorization for which a Station has ever discontinued operating for any reason for a continuous period of one year or more. As to each such authorization, (a) specify the date(s) when the Station discontinued operating and, if applicable, when it resumed operating; and (b) explain fully why the Station discontinued operating for a period of one year or more.*

First, Maritime does not concede that the time period of one year has any specific relevance. Second, for the reasons stated in the preceding response, Maritime may obtain additional information responsive to this interrogatory and, if so, will supplement this answer accordingly.

Maritime has never intentionally and voluntarily abandoned any of its stations nor has it ever had the intention to permanently discontinue operations of any of its facilities. Due to various circumstances beyond Maritime's control, however, operations at some of the stations were temporarily suspended for short periods of time due to such things as lack of sufficient revenue, inability to maintain rent and utility expenses, etc. Maritime in Chapter 11, and it has continuously worked to maintain its authorizations and restore services, and has in many instances succeeded, under extremely difficult circumstances, in negotiating spectrum use agreements for use of the spectrum. In cases where this was done, Maritime reestablished any dormant operations, brought any leases current, and verified the operational status of the underlying licensed facilities. The market for AMTS services also changed dramatically, the demand for service to marine vessels being supplanted by cellular and broadband data services. Taking advantage of FCC rule changes allowing other uses of AMTS spectrum, Maritime therefore shifted its focus toward more efficient and in-demand services, such as Positive Train Control and Smart Grid applications, as well as Motorola's PassPort digitally switched systems rather than