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April 8, 2014

**VIA HAND DELIVERY AND ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Informal Opposition to Pending Applications and Associated Waiver  
Requests filed by Spectrum Networks Group, LLC

FCC File Nos. 0006203140 *et al.*<sup>1</sup>

Dear Ms. Dortch:

In accordance with FCC Rule Section 1.41, the Enterprise Wireless Alliance (“EWA”) requests that the FCC deny the Requests for Waiver (“Waiver Requests”) filed by Spectrum Network Group, LLC (“SNG”) in connection with each of the above-referenced applications and dismiss the applications. The Waiver Requests are the most recent attempt by SNG (like similar entities over the years) to secure 900 MHz Industrial/Business (“I/B”) spectrum for speculative purposes without satisfying the private internal use requirement established in FCC Rule Section 90.617(c).<sup>2</sup> The FCC properly has denied such requests in the past and should do so in this instance.

EWA is an FCC-certified Frequency Advisory Committee, authorized by the Commission to recommend Part 90 frequencies for use by qualified applicants and to deny coordination to applicants whose proposed use of frequencies does not meet the FCC rules. More broadly, the organization represents the interests of its I/B member entities that require access to Part 90 spectrum to satisfy eligible communications requirements. As such, EWA has a direct interest in ensuring that entities authorized for Part 90 900 MHz I/B frequencies either are qualified to hold such licenses, which SNG is not, or present compelling arguments warranting waiver relief. The Waiver Requests fail on that count. As their grant would remove the spectrum from the pool of

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<sup>1</sup> See Attachment 1 for a list of all SNG applications for 900 MHz spectrum.

<sup>2</sup> Although the Waiver Requests make clear that SNG intends to provide a commercial service, the FB2 station class specified on the application indicates private internal use.

available 900 MHz frequencies and establish a precedent for waiver relief that would swamp the rule itself, EWA and its members would be adversely affected by the FCC's grant of the above-identified applications.

The instant applications and Waiver Requests do not represent SNG's first involvement in an effort to acquire 900 MHz I/B spectrum for the provision of a commercial service or, more likely given the marketing materials with which it is associated, in the hope of a sale of the spectrum to a commercial service provider. SNG is the common link among applications for 900 MHz I/B channels filed by multiple entities in the fall of 2013.<sup>3</sup> SNG is identified as the "Contact" on each of those applications and is understood to have marketed the spectrum opportunity they supposedly represent, prepared the applications, and arranged for their coordination and filing with the FCC. Indeed SNG's business address is identified as the control point location for each of those applications.

EWA filed an Informal Opposition to those filings, which had stated that the intended use of the spectrum was to "provide wireless services to Part 90 eligibles."<sup>4</sup> EWA noted that the frequencies requested were allocated under FCC Rule Section 90.617(c), which states the following:

The channels listed in Table 3 are available to applicants eligible in the Industrial/Business Pool of subpart C of this part but exclude Special Mobilized Radio Systems as defined in §90.603(c). These frequencies are available in non-border areas. **Specialized Mobile Radio (SMR) systems will not be authorized on these frequencies.**<sup>5</sup>

The subsequent claim by the applicants that they are free to self-select out of classification as SMR by promising not to serve individuals and Federal Government users, a claim repeated in the Waiver Requests, is unavailing. There is no such option in the FCC rules. FCC Rule Section 90.179 governs the shared use of Part 90 frequencies and its Subsection (f) states the following:

Above 800 MHz, shared use on a for-profit private carrier basis is permitted only by **SMR**, Private Carrier Paging, LMS, and DSRCS licensees.<sup>6</sup>

EWA again urges the FCC to dismiss those applications.

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<sup>3</sup> See, e.g., FCC File Nos. 0005974431, 0005974742, 0005983156, 0005987130, 0006038076, and 0006038075.

<sup>4</sup>EWA Informal Opposition to Pending Applications dated January 6, 2014 (lead application File No. 0005974431); see also EWA Informal Opposition to Pending Applications dated January 30, 2014, FCC File Nos. 0006117437 and 0006117069.

<sup>5</sup> 47 C.F.R. §90.617(c) (emphasis added).

<sup>6</sup> 47 C.F.R. §90.179(f) (emphasis added).

Perhaps recognizing that the licensing approach crafted on behalf of itself and its customers likely would not be successful, SNG has abandoned that scheme for purposes of filing the above-identified applications and embarked on a more audacious one. It now seeks spectrum in its own name, not on behalf of the customers it was assisting only months ago. It also reluctantly acknowledges that waiver relief might be needed to obtain 900 MHz I/B channels for applicants that have no internal communications needs. However, SNG now claims to have a plan for a nationwide network that it argues warrants waiver relief. It states that its subsidiary, M2M Spectrum Network, LLC (“M2M”), intends to “build a network using the 900 MHz I/B frequencies and provide communications services to businesses for their private, internal machine-to-machine communications needs.”<sup>78</sup> According to SNG, “Although the 900 MHz spectrum comes in only small allocations, it is available in all parts of the United States, and its frequencies and protocols are ideal for such a network.”<sup>9</sup>

EWA must beg to differ with all but the first of the attributes ascribed to this spectrum by SNG. It does, indeed, come in small allocations – 12.5 kHz bandwidth channels; but, it is not available in all parts of the country. In fact, all 900 MHz I/B channels have long been licensed in and around most major metropolitan areas. Thus, while SNG was able to find ten unassigned channels somewhere in the Philadelphia area, many of the outposts for the national network it says M2M will deploy are in markets such as Murrells Inlet, SC, Niles, MI, and Tumwater, WA, none of which has a population of even 20,000. EWA also questions what technical analysis supports the statement that these 900 MHz frequencies and their “protocols,” whatever SNG means by that term, are “ideal” for a nationwide M2M network. The Waiver Requests contain bald assertions by SNG about its plans for this spectrum, but are strikingly devoid of any product development details, information regarding FCC certification for this 900 MHz data product, business plans, funding status to support a “nationwide network,” or other relevant documentation that might provide credence in support of waiver relief. Although the Waiver Requests state that M2M “has already secured network equipment, tower space, and engineering partners to build out the network”<sup>10</sup> and that M2M has not only identified, but is in the process of “lining up” customers<sup>11</sup> for the service, CCD 900 Communications, LLC, one of SNG’s customers, made no mention of

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<sup>7</sup> Waiver Requests at 1.

<sup>8</sup> Machine-to-machine communications needs typically are for devices at fixed locations. The applications all request authority for thousands of what appear to be 5 watt portables, an unusual configuration for an M2M operation. Although SMR licensees have broad latitude in terms of service offerings, if the proposed service were entirely or even primarily fixed, it is not clear such usage would be consistent with the primary purpose of this band, which is to meet “mobile communications needs.” SMR Systems (Secondary Fixed Signaling), *Report and Order*, PR Docket No. 86-78, 1 FCC Rcd 926 at ¶ 8. It is for this reason that fixed units do not count toward mobile loading in this band. *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> Waiver Requests at 1.

<sup>11</sup> *Id.*

such a network when it responded to EWA's Petition for Reconsideration of the grant of station WQTE752 less than sixty days ago.<sup>12</sup>

The FCC has addressed similarly unsupported claims on this spectrum in the past. For example, it dismissed applications for 900 MHz I/B frequencies from EFL Realty Trust ("EFL"), which dismissal was upheld in response to an Application for Review.<sup>13</sup> EFL filed thirteen applications for a total of 123 I/B channels with a collective mobile loading of 11,281 units based on the following eligibility statement: "Applicant will use radios for transmission of communications essential to business distribution of commodities and services to commercial and non commercial [sic] entities."<sup>14</sup> In response to an FCC inquiry, EFL was unable to provide documentation such as local business licenses for the markets in which it had requested spectrum, addresses and telephone numbers for those local business operations, and the number of vehicles at each location. The FCC concluded that EFL "has not provided information sufficient to justify the number of channels and mobile units requested in its applications."<sup>15</sup> It noted that, "...an Industrial/Land Transportation licensee that cannot meet our loading requirements...is essentially warehousing spectrum in hopeful anticipation of long term growth of a business."<sup>16</sup>

The Commission reached similar conclusions in response to other application packagers that tried various means of evading the 900 MHz I/B eligibility and loading requirements. When Viking Dispatch Services, Inc. ("VDS") requested up to twenty 900 MHz channels at forty-two sites for what it claimed would be a not-for-profit, cost-shared provision of service to two-way dispatch users, the Commission did not rely on the applicant's self-serving description of the service it planned to offer.<sup>17</sup> Instead, it applied common sense to the proposal and concluded that it was a construct designed to evade the rules governing the use of 900 MHz I/B frequencies. In particular, the FCC was troubled by VDS' failure to identify any particular entities that would be sharing the use of the system. The Commission affirmed the Wireless Telecommunications Bureau's decision to question the proposal given "the totality of the circumstances"<sup>18</sup> and concluded that VDS' proposed use of the spectrum was not consistent with the FCC's rules or with the public interest.

The Commission's decision in response to applications filed by LMR Systems, Inc. ("LMR") also is instructive.<sup>19</sup> LMR filed seventeen applications that included requests for multiple 900 MHz I/B channels at sites throughout the country. Like SNG, LMR requested a waiver of the rules governing eligibility for those channels, claiming

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<sup>12</sup> See Opposition to EWA's Petition for Reconsideration filed Feb. 10, 2014.

<sup>13</sup> EFL Realty Trust, *Order*, 23 FCC Rcd 15086 (2008) ("EFL Order").

<sup>14</sup> *Id.* at ¶ 5.

<sup>15</sup> *Id.* at ¶ 9.

<sup>16</sup> *Id.* at ¶ 15.

<sup>17</sup> Viking Dispatch Services, Inc., *Memorandum Opinion and Order*, 14 FCC Rcd 18814 (1999).

<sup>18</sup> *Id.* at ¶ 8.

<sup>19</sup> LMR Systems, Inc. *Memorandum Opinion and Order*, 17 FCC Rcd 8759 (2002).

that it intended to provide commercial service, what it labeled AIRSMR service, that would serve only end users associated with airport activities, such as airlines, freight and cargo firms, baggage handlers, and car rental companies – a prospective user base even more limited than that proposed by SNG. LMR stated that it had considered, but rejected, a non-for-profit shared system as too cumbersome from a regulatory perspective. After its waiver request was opposed by numerous parties as a transparent spectrum play, LMR abandoned that approach in favor of the VDS model. It reinvented itself as a purportedly not-for-profit provider of service and asserted no waiver relief was needed. While the FCC allowed LMR an opportunity to provide documentation that would support its proposal, the Commission concluded that the showing was not adequate and dismissed all of LMR’s applications.<sup>20</sup>

SNG’s frontal assault on this spectrum should be rejected as well. The “business plan” in the Waiver Requests is no more substantive, and therefore persuasive, than the ones presented by EFL, VDS, or LMR. Like its predecessors, SNG offers only the barest description of the activity for which it seeks waiver relief and no evidence that it has the ability to provide the service described,<sup>21</sup> even if there were evidence that such a service was desired or likely to succeed, which there is not. If the FCC were to grant these applications, it is difficult to imagine what request to waive the 900 MHz I/B eligibility and loading requirements it could deny. Any applicant could declare its intention to provide a specialized service and claim 900 MHz I/B spectrum that is not intended to be available for commercial “on the come” offerings.

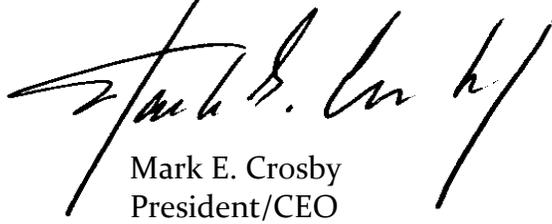
As the FCC stated in its denial of EFL’s Application for Review, “Our loading requirements are intended to identify those applicants that by all appearances may intend to warehouse spectrum in anticipation of speculative business growth or profit from selling unneeded licenses.” The Waiver Requests are simply the most recent in a long history of efforts to circumvent the intent of the FCC rules and secure 900 MHz I/B spectrum for just those purposes. EWA urges the Commission to deny the Waiver Requests and dismiss the associated applications.

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<sup>20</sup> The FCC has not simply accepted loading claims as stated on applications and has denied applications when applicants were unable to demonstrate that the FCC loading requirements would be satisfied. *See, e.g.*, J & W Mobile Radio Association, *Order*, 15 FCC Rcd 1893 (WTB, PSPD 2000); *see also*, Mobilecom Pittsburg, Inc., *Memorandum Opinion and Order*, 18 FCC Rcd 6685 (PSPWD 2003); letter dismissing application from Thomas Kurian, FCC File No. 000187224, *Notice of Dismissal*, Reference No. 3150219 (Nov. 19, 2004).

<sup>21</sup> While the FCC typically relies on the representations of its applicants as to their qualifications for the licenses sought, those seeking relief from the FCC’s rules through the waiver process warrant a greater level of scrutiny. M2M is an Arizona limited liability company formed in May 2013. If the Commission believes that the Waiver Requests represent a credible proposal warranting meaningful consideration, which EWA believes they do not, it certainly should investigate the *bona fides* and experience of the company’s principals, as that information will bear on the likelihood of their success.

Respectfully submitted,



Mark E. Crosby  
President/CEO

MEC:

Attachment

cc: Carole L. Downs, Spectrum Networks Group, LLC  
Dr. David J. Mellish, Mellcell, Inc.  
Doreen Frank, Skygold Technologies, LLC  
Dr. Daniel Ciechanowski, CCD 900 Communications, LLC  
Dr. Gary J. Friedland, Sharmell, LLC  
Walter M. Finken, DMD, Finken Tracking & Comm., LLC  
David A. Mellish, Matly, LLC  
Armando Nevarez, EZ-Raven Comms, LLC  
Richard Lorenz, AAA  
Kyle May, AAA  
Scot Stone, WTB, FCC

File Number	Receipt Date	Applicant Name	Site	Number of Channels
0006201203	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	LONGWOOD,FL	2
0006201205	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SMYRNA, GA	8
0006201206	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	MILWAUKEE, WI	10
0006201208	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	INDIANAPOLIS, IN	10
0006201210	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	EWINGDALE, TN	10
0006201211	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	ST LOUIS, MO	10
0006201213	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	HOUSTON, TX	2
0006201214	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SAN ANTONIO, TX	10
0006201216	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	MURRAY, UT	8
0006201217	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SAN BERNARDINO, CA	2
0006201220	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	YUMA, AZ	10
0006201221	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SANTA BARBARA, CA	10
0006201222	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SALINAS, CA	10
0006201223	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	CERES, CA	10
0006201224	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SACRAMENTO, CA	1
0006201226	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	TOA ALTA, PR	10
	3/26/2014	SPECTRUM NETWORKS GROUP, LLC	TOA ALTA, PR	10
0006201227	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	AGAWAM, MA	10
0006201229	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	COACHELLA, CA	10
0006201230	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	CICERO, NY	10
0006201231	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	RICHMOND, VA	10
0006201232	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	VIRGINIA BEACH, VA	10
0006201233	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	RICHLAND, MS	10
0006201234	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	OVERTON, AL	10
0006201235	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	NORTH LITTLE ROCK, A	10
0006201237	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	DES MOINES, IA	10
0006201238	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	TURLEY, OK	10
0006201239	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	OKLAHOMA CITY, OK	10
0006201240	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	MANOR, TX	3
0006201241	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	FRESNO, CA	10
0006201242	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	WAIKIKI, HI	10
0006201243	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	PHENIX CITY, AL	10
0006201244	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	MIDLAND, TX	10
0006201371	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	TOLEDO, OH	9
			DETROIT, MI	4
0006201372	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	PORTLAND, OR	10
0006201373	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	MALTA, NY	10
0006201375	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	MURRELLS INLET, SC	10
0006201376	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	KNOXVILLE, TN	10
0006201377	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	NILES, MI	10
0006201378	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	HUNTSVILLE, AL	10
0006201379	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SPRINGFIELD, MO	10
0006201380	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	WICHITA, KS	10
0006201381	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	MC ALLEN, TX	10
0006201382	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SPOKANE, WA	10
0006201383	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	TUCSON, WA	10
0006201384	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	OLYPHANT, PA	10
0006201385	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	VINTON, VA	10
0006201386	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	EVANSVILLE,IN	10
0006201387	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	EUGENE, OR	10
0006201389	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	MACON, GA	10
0006201390	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	BAKERSFLD,CA	10
0006201391	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	EAST BATON, LA	5
			RAYNE, LA	10
			WESTLAKE, LA	10
			VIDOR, TX	10
0006201392	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	LONGVIEW, PA	10
0006201393	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SELAHBUTTE,WA	10
0006201394	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	RED BANK, TN	10

<b>File Number</b>	<b>Receipt Date</b>	<b>Applicant Name</b>	<b>Site</b>	<b>Number of Channels</b>
0006201395	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	SAVANNAH, GA	10
0006201396	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	RENO, NV	10
0006201397	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	GARDEN CITY, ID	10
0006201398	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	WACO, TX	10
0006201400	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	TYLER, TX	10
0006201401	3/14/2014	SPECTRUM NETWORKS GROUP, LLC	ANCHORAGE, AK	10
0006202421	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	COUNCIL, IA	10
			HUSKERVILLE, NE	10
0006202425	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	LEXINGTON, SC	10
			BLYTHE, GA	10
0006202430	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	GREENSBORO, NC	10
			RALEIGH, NC	10
			FAYETTEVILLE, NC	10
0006202434	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	HAMPDEN, PA	10
			PHILA. PA	10
			HYATTSVILLE, MD	1
			HARFORD, MD	9
0006202441	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	MOBILE, AL	10
			PENSACOLA, FL	10
			WOOL MARKET, MS	10
0006202446	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	MEMPHIS, TN	10
			BROOKLAND, AR	10
0006202451	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	ROCHESTER, NY	10
			DEPEW, NY	10
0006202454	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	REDMOND, WA	10
			TUMWATER, WA	10
0006202458	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	KANSAS, KS	10
			TOPEKA, KS	10
0006202461	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	BELVIDERE, IL	10
			VERONA, WI	10
0006202464	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	LANSING, MI	10
			KENTWOOD, MI	10
0006202471	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	CHARLOTTE, NC	10
			GREENVILLE, SC	10
			ASHEVILLE, NC	10
			PINEY FLATS, TN	10
			GRANITE FALLS, NC	10
0006202475	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	FALMOUTH, ME	10
			LACONIA, NH	10
0006203109	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	LEXINGTON, KY	10
			UTICA, IN	10
0006203115	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	NEW HAVEN, IN	10
0006203116	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	URBANA, IL	10
0006203118	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	PONTOTOC, MS	10
0006203119	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	BURLINGTON, VT	10
0006203121	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	SHREVEPORT, LA	10
0006203122	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	CORPUS, TX	10
0006203124	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	SIOUX FALLS, SD	10
0006203126	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	ALEXANDRIA, LA	10
0006203132	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	EDDINGTON, ME	10
0006203134	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	FAYETTEVILLE, AR	10
0006203135	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	SPRINGFIELD, IL	10
0006203136	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	HARBORCREEK, PA	10
0006203137	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	AMARILLO, TX	10
0006203139	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	MONTGOMERY, AL	10
0006203140	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	LEESBURG, GA	10
0006203141	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	WAUSAU, WI	10
0006203144	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	FLAGSTAFF, AZ	10

<b>File Number</b>	<b>Receipt Date</b>	<b>Applicant Name</b>	<b>Site</b>	<b>Number of Channels</b>
0006203145	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	CASPER, WY	10
0006203146	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	BILLINGS, MT	10
0006203147	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	MISSOULA, MT	10
0006203148	3/17/2014	SPECTRUM NETWORKS GROUP, LLC	PALO, IL	10
0006204656	3/18/2014	SPECTRUM NETWORKS GROUP, LLC	DUNLAP, IA	10
			DAVENPORT, IA	10
0006204657	3/18/2014	SPECTRUM NETWORKS GROUP, LLC	DEPERE, WI	10
			APPLETON, WI	10
0006204660	3/18/2014	SPECTRUM NETWORKS GROUP, LLC	SANTA FE, NM	10
			ALBUQUERQUE, NM	10
0006204662	3/18/2014	SPECTRUM NETWORKS GROUP, LLC	WHEELING, WV	10
			PITTSBURGH, PA	10
			YOUNGSTOWN, OH	10