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August 2, 2021

Via Experimental Licensing System

Office of Engineering and Technology
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: ELS File Nos. 0188-EX-CR-2021 and 0094-EX-CM-2021 (Call Sign WI2XXG)

To Whom It May Concern:

3DB Communication Inc. (“3DB”) files this letter in response to the informal objection filed by Shortwave Solutions LLC (“Shortwave”) in ELS File No. 0094-EX-CM-2021.¹ As demonstrated below, Shortwave’s informal objection: (1) fails to raise an issue that OET could not have contemplated when it granted 3DB’s applications; and (2) recycles arguments Shortwave makes in other applications currently being reviewed by other FCC staff. Accordingly, OET should not waste its time reviewing an informal objection to already granted applications and, instead, dismiss it.

Shortwave concedes that OET has already granted the applications.² While Shortwave attempts to minimize the importance of this fact,³ the applications’ status as granted is relevant and favors dismissal of the informal objection. OET thoroughly reviewed 3DB’s applications and exhibits.⁴ Based on its comprehensive review, OET determined that the applications complied with the Commission’s rules and, accordingly, granted them. Shortwave’s untimely complaints only rehash issues that OET already considered before granting 3DB’s applications.

Failure to dismiss the informal objection will only waste the Commission’s limited resources. In its filing, Shortwave simply recycles arguments made in the informal objections that Shortwave filed to *DPA Mac’s* international high-frequency broadcast application.⁵ *DPA Mac* responded to Shortwave’s arguments,⁶ and International Bureau review of that application is underway. The FCC should not waste its limited resources by enlisting different staff to review the same complaints, especially where, as here, the arguments repeat previously rejected theories and emanate from a market rival seeking to exploit public process for private gain.

¹ 3DB notes that Shortwave’s informal objection lists ELS File Nos. 0188-EX-CR-2021 and 0094-EX-CM-2021 in its caption title but appears only in ELS File No. 0094-EX-CM-2021. Out of an abundance of caution, 3DB files this response in both file numbers.

² See ELS File No. 0094-EX-CM-2021, Informal Objection at 3 (noting “the applications were granted”) (“Informal Objection”).

³ See *id.* (“[T]here is no clause requiring that the objection be made ‘before FCC action on any application,’ unlike in other Services.”).

⁴ See, e.g., ELS File No. 0188-EX-CR-2021, Exhibit 1 (*DPA Mac* “has sought a permit to construct an international high-frequency radio service pursuant to Part 73(f) of the Commission’s rules.”).

⁵ IBFS File No. IHF-C/P-20201228-00010.

⁶ See IBFS File No. IHF-C/P-20201228-00010, Opposition to Informal Objection (May 3, 2021) and Opposition to Second Informal Objection (July 27, 2021).

Please let me know if you have any further questions.

Sincerely,

/s/ Trey Hanbury

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