

# STAMP AND RETURN

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October 30, 2008

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

FILED/ACCEPTED

OCT 30 2008

Federal Communications Commission  
Office of the Secretary

Attention: International Bureau

Re: *United Wireless Holdings Inc.: Amendment to Petition for Declaratory Ruling (File No. ISP-PDR-20080404-00010)*

Dear Ms. Dortch:

United Wireless Holdings Inc. ("United Wireless"), by its attorneys, hereby amends the above-referenced pending Petition for Declaratory Ruling (the "Petition") which relates, in part, to the proposed transfer of control of United Wireless's subsidiary United Spectrum Management Services LLC ("United Spectrum"). Specifically, United Wireless seeks to update the spectrum lease identification numbers provided in the first footnote of the Petition regarding the 900 MHz spectrum that United Spectrum leases from a subsidiary of Sprint Nextel to provide wireless data services. United Spectrum and the lessor have entered into new lease agreements that modify the 900 MHz frequencies that will be used by United Spectrum to provide those services. The parties have filed applications seeking the Commission's consent to the new leasing arrangements (the "New Lease Applications").<sup>1</sup>

United Spectrum's foreign ownership presently falls within the limits contained in Section 310 of the Communications Act of 1934, as amended; thus, the New Lease Applications can be processed prior to Commission action on the Petition. However, since consummation of the transfer of control that is proposed in the Petition would ultimately implicate the spectrum that is leased pursuant to the New Lease Applications, United Wireless hereby amends its

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<sup>1</sup> See FCC File Nos. 0003614052 and 0003614063 (new Lease ID Nos. L000003993 – L000004048).

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Ms. Marlene H. Dortch

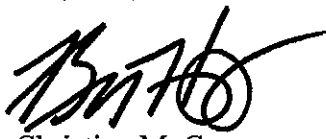
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Petition to include the spectrum encompassed by the New Lease Applications.<sup>2</sup> United Wireless respectfully requests that the Commission associate the instant amendment with its Petition.

Please do not hesitate to contact the undersigned should you have any questions in this regard.

Very truly yours,



Christine M. Crowe

Brian W. Higgins

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<sup>2</sup> United Wireless is simultaneously amending the pending application seeking the Commission's consent to the proposed transfer of control of United Spectrum (FCC File No. 0003385641) to reflect the New Lease Applications.