

Attachment
Full Spectrum Inc.
Petition for Section 310(b)(4) Declaratory Ruling

Full Spectrum Inc. (“Full Spectrum”) is a manufacturer of radio equipment serving critical infrastructure industries, including utilities and emergency services (police, fire, medical). Full Spectrum has made arrangements with FCC license holders to lease radio spectrum in connection with demonstrating and deploying its equipment.

Northmatic Ltd., a company organized under the laws of the United Kingdom, holds a 32% ownership interest in Full Spectrum.¹ Northmatic Ltd.’s address is: 12 The Shrubberies, George Lane, London, E18 1BD. United Kingdom. Given Northmatic Ltd.’s ownership interest, Full Spectrum is submitting this petition pursuant to Section 310(b)(4) of the Communications Act of 1934 (the “Act”) for a declaratory ruling to allow Full Spectrum to be a lessee of FCC-licensed radio spectrum.

Allowing Full Spectrum to be a lessee of FCC-licensed spectrum is consistent Commission’s Section 310(b)(4) policies which recognize a strong presumption that foreign ownership of radio licenses by entities whose home markets are in countries that are members of the World Trade Organization (WTO) serves the public interest. In this case, the United Kingdom has been a WTO member since January 1, 1995.² Accordingly, it is respectfully requested that the Commission issue a declaratory ruling pursuant to Section 310(b)(4) of the Act to allow Full Spectrum to be a lessee of FCC-licensed radio spectrum.

¹ See FCC Ownership Report (Form 602), File No. 0004653197.

² See WTO webpage for United Kingdom, retrievable at:
http://www.wto.org/english/thewto_e/countries_e/united_kingdom_e.htm