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April 26, 2016

Susan O'Connell  
David Krech  
International Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Limitless Mobile, LLC  
Limitless Mobile Holdings, LLC  
Petition for Attribution Ruling  
File No. ISP-PDR-20140716-00009**

Dear Ms. O'Connell and Mr. Krech:

On July 16, 2014 Limitless Mobile, LLC ("LM") and its parent company, Limitless Mobile Holdings, LLC ("LMH") jointly filed a petition seeking seek a declaratory ruling from the Commission that LMH, though organized as a limited liability company, is structured and operated in the same manner as a corporation, and that LMH can be treated as a corporation for purposes of attributing domestic and foreign ownership of LM as contemplated in footnote 331 of the Second Report and Order.<sup>1</sup> On December 4, 2014, the parties submitted a Supplement to provide updated information to the Commission regarding the matters raised in the Petition. Following discussions with Commission staff, on July 30, 2015 LM and LMH requested specific approval for the foreign ownership interests held by two foreign nationals that would not be considered insulated due to their management roles within that company. That request is currently under review by the Executive Branch (Team Telecom).

The purpose of this filing is to request that, to the extent necessary, the Petition be expanded to include a number of licenses and authorizations that have been acquired by LM and other LM affiliates during the pendency of the Declaratory Ruling Petition. This information is contemporaneously being included as part of an information update provided to Team Telecom as part of the ongoing Executive Branch foreign ownership review of LM and LMH.

Specifically, LM and LMH request that the Commission include the following licenses/authorizations within the scope of the pending Declaratory Ruling Petition:

<sup>1</sup> *Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as amended*, Second Report and Order, 28 FCC Rcd 5741 (2013) ("Second Report and Order").

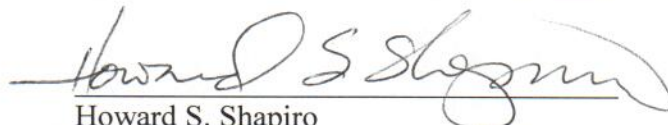
1. On March 10, 2016, Limitless Mobile Wholesale, Inc. ("LMW"), a wholly-owned subsidiary of LMH filed an application with the FCC for Global or Limited Global Facilities-Based Authority (Section 63.18(e)(1)) and for Global or Limited Global Resale Authority (Section 63.18(e)(2)) to provide International telecommunications services. See File No. ITC-ITC-214-20160310-00119. That application appeared on public notice as accepted for streamlined processing on March 25, 2016<sup>2</sup> and was granted April 8, 2016.<sup>3</sup> Pursuant to section 1.994(b) of the Commission's rules, a foreign ownership ruling issued to a licensee shall cover any U.S. -organized subsidiary or affiliate so long as the foreign ownership of the licensee named in the ruling and of the subsidiary/affiliate remains in compliance with the terms of the ruling and the Commission's rules. As LMW is a wholly owned subsidiary of LMH and an affiliate of LM, LMW should be covered by any foreign ownership ruling issued to LM and LMH, the co-petitioners. However, since LMW did not hold the International 214 authority at the time the Petition was filed and there is not yet an existing ownership ruling that would apply to LMW, LM and LMH request, out of an abundance of caution, that this new International 214 authority be included within the pending foreign ownership review for LM and LMH.

2. Over the last several months, LM through an engineering consultant has applied for and received approximately 89 private microwave licenses for the purpose of providing cell site interconnection and backhaul in connection with the ongoing upgrade and rebuild of LM's wireless facilities. Although none of these microwave facilities are licensed as common carrier facilities these facilities will be an integral part of LM's mobile network. Accordingly, LM and LMH request that to the extent necessary, these ancillary non-common carrier wireless licenses be included within the pending foreign ownership review for LM and LMH.

Should you have any questions concerning the foregoing, please do not hesitate to contact me.

Respectfully submitted,

LIMITLESS MOBILE, LLC  
LIMITLESS MOBILE HOLDINGS, LLC



Howard S. Shapiro  
Counsel for Limitless Mobile, LLC and  
Limitless Mobile Holdings, LLC

cc: David Krech (via e-mail)  
Susan O'Connell (via e-mail)

<sup>2</sup> See Report No. TEL-01781S.

<sup>3</sup> See Report No. TEL-01786, International Authorizations Granted, DA 16-401 (rel. April 14, 2016).