



NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AND COUNSELORS AT LAW

Robert L. Hoegle
(Admitted in DC & NY)
T 202.689.2816 F 202.689.2836
bob.hoegle@nelsonmullins.com

101 Constitution Avenue, NW | Suite 900
Washington, DC 20001
T 202.689.2800 F 202.689.2860
nelsonmullins.com

December 12, 2019

Via IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Liberty Latin America Ltd. – Revised Petition for Declaratory Ruling;
ISP-PDR-20191114-00009

Dear Ms. Dortch:

Liberty Latin America Ltd. (“LLA”) is filing the attached Revised Petition for Declaratory Ruling in the above-referenced file number. LLA has revised the Petition to incorporate certain requests for clarification by the FCC staff.

Very truly yours,

A handwritten signature in blue ink that reads 'Robert Hoegle'.

Robert L. Hoegle

RLH:kjk
Enclosure

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Liberty Latin America Ltd.)	ISP-PDR-20191114-00009
)	
Petition for Declaratory Ruling under)	
Section 310(b)(4) of the Communications)	
Act of 1934, as Amended)	
)	
To: International Bureau)	

REVISED PETITION FOR DECLARATORY RULING

Pursuant to 47 U.S.C. §310(b)(4) and 47 C.F.R. §1.5000(a)(1), Liberty Latin America Ltd. (“LLA”) respectfully petitions the Federal Communications Commission (“FCC” or “Commission”) for a declaratory ruling that it would not serve the public interest to prohibit LLA—an entity organized under the laws of Bermuda, but majority-owned and controlled by U.S. persons—from acquiring ultimate indirect ownership and control of two FCC licensee entities that are currently wholly-owned by AT&T Inc. (“AT&T”) in the proposed transaction described herein.

LLA submits this petition in connection with applications seeking FCC consent to the transfer of control of AT&T Mobility Puerto Rico Inc. (“AT&T Mobility PR”) and AT&T Mobility USVI Inc. (“AT&T Mobility USVI”) from AT&T to Leo Cable LP (“Leo Cable”), a Delaware limited partnership and an indirect, wholly-owned subsidiary of LLA, and ultimately to LLA.¹ Pursuant to a Stock Purchase Agreement dated October 9, 2019, and subject to

¹ LLA and AT&T have filed a series of transfer of control applications for the proposed transaction described in this petition. The file number for the lead wireless transfer of control application is 0008836370. The lead application contains a comprehensive description of the transaction and public interest statement.

regulatory approval, Leo Cable has agreed to acquire all of the outstanding capital stock of Beach Holding Corporation (“Beach”) from AT&T Corp., AT&T International Holdings, LLC, and SBC Telecom, Inc. Beach holds all of the outstanding capital stock of FCC licensee subsidiaries AT&T Mobility PR and AT&T Mobility USVI.

LLA’s shares are publicly traded on the NASDAQ Stock Exchange, and U.S. persons own over 80 percent of LLA’s aggregate voting interests, and over 67 percent of LLA’s aggregate outstanding equity. Approval of this petition will facilitate significant transaction-specific benefits resulting from LLA’s proposed transaction with AT&T. By combining the complementary businesses of LLA’s wholly-owned subsidiary Liberty Cablevision of Puerto Rico LLC (“LCPR”) with AT&T Mobility PR and AT&T Mobility USVI, LCPR will have the facilities and operations to provide mobile wireless services in Puerto Rico and the U.S. Virgin Islands (“USVI”). The transaction therefore will result in important public interest benefits for consumers in Puerto Rico and USVI.² Given these meaningful transaction-specific benefits and the majority ownership and control of LLA by U.S. persons, it would not serve the public interest to prohibit LLA’s ultimate ownership and control of the licensee subsidiaries based solely upon LLA’s organization in Bermuda.

BACKGROUND

LLA, a Bermuda company limited by shares, provides communications and entertainment services in Chile, Puerto Rico, the Caribbean and other parts of Latin America, including video, broadband internet, telephony and mobile services. LLA’s shares are publicly-traded on the NASDAQ Stock Exchange, and it maintains executive offices in Denver, Colorado and certain network operations and facilities in Miami, Florida and in

² See *infra* at 4-5.

Puerto Rico. LLA is a public company controlled by its Board of Directors, who are elected by its shareholders.

AT&T Mobility PR and AT&T Mobility USVI provide mobile wireless voice and mobile wireless data communications services to residential and business customers in Puerto Rico and USVI, as well as wireline internet, private data, VoIP, TDM voice, data center, and associated services to certain business customers located in Puerto Rico. AT&T Mobility PR and AT&T Mobility USVI hold numerous FCC wireless licenses and international section 214 authorizations as set forth in Schedule 1.

The following existing wholly-owned subsidiaries of LLA hold certain non-Title III FCC licenses and authorizations: A.SurNet, Inc., ARCOS-1 USA, Inc., Columbus Networks Puerto Rico, Inc., Columbus Networks Telecommunications Services USA, Inc., Columbus Networks USA, Inc., CWC New Cayman Limited and LCPR. LCPR is the largest cable operator in Puerto Rico, passing over one million homes or approximately 85 percent of the households in Puerto Rico. LCPR currently provides: (1) broadband internet services to approximately 340,000 customers; (2) video services to approximately 220,000 customers; and (3) fixed line telephony to approximately 205,000 customers.

PUBLIC INTEREST SHOWING

LLA respectfully submits that it would not serve the public interest to prohibit LLA's proposed ultimate ownership and control of AT&T Mobility PR and AT&T Mobility USVI based solely upon LLA's organization under Bermuda law. LLA's shares are publicly-traded on the NASDAQ Stock Market, and it maintains executive offices in Denver, Colorado and certain network facilities and operations in Miami, Florida and Puerto Rico. LLA's recent analysis of its share ownership analysis confirms that U.S. persons hold more than 80 percent

of LLA's voting interests. Specifically, LLA has determined that U.S. persons own: (1) 37,547,625 Class A³ Common Shares (approximately 80 percent of total Class A shares outstanding); and (2) 1,865,201 Class B⁴ Common Shares (approximately 96 percent of total Class B shares outstanding). Thus, on an aggregate basis, U.S. persons hold approximately 83 percent of LLA's voting interests. With respect to equity ownership, the analysis determined that, of the total 181,064,520 outstanding common shares of LLA (Classes A, B and C⁵), 122,821,717 shares are owned by U.S. persons. U.S. persons therefore own 67.8 percent of LLA's aggregate outstanding equity.

LLA reviewed the following information to estimate the relative proportions of U.S. domestic and foreign beneficial owners and holders of equity and voting interests in LLA:

- Information recorded in LLA's share register regarding the registered owners of Class A Common Shares provided by Computershare Trust Company, N.A., which serves as LLA's registrar and transfer agent.
- Information regarding the share ownership of LLA's directors and officers, as disclosed in LLA's Proxy Statement for its 2019 Annual General Meeting of Shareholders, filed with the U.S. Securities and Exchange Commission ("SEC") on April 3, 2019 ("2019 Proxy Statement").
- The information publicly disclosed by each person or entity that holds more than five percent of LLA's outstanding voting securities pursuant to Section 13(d) and 13(g) of the Securities Exchange Act of 1934 ("Exchange Act") and the SEC's rules promulgated thereunder, as reflected in such holders' Schedule 13D or 13G filings with the SEC.
- Geographical ownership analyses of the Class A Common Shares held in "street name" provided by Mediant Communications Inc. and Broadridge Financial Solutions, Inc., which provide investor communications and related services to LLA and to the broker/dealers, banks and other financial institutions whose customers hold LLA's Class A Common Shares.

³ Holders of Class A shares have one vote per share.

⁴ Holders of Class B shares have 10 votes per share.

⁵ LLA's Class C shares are non-voting.

- Listings of non-objecting beneficial owners (“NOBOs”) of the Class A Shares and the Class C Shares, including the names, addresses and share positions of the NOBOs.
- The listing of shareholders entitled to vote at LLA’s 2019 Annual General Meeting of Shareholders.

The FCC treats Bermuda, LLA’s place of organization, as a member of the World Trade Organization (“WTO”).⁶ The United States and Bermuda have been allies and trading partners since the 1700’s, and maintain strong government and commercial ties today.⁷ In addition, the FCC has approved 100 percent ownership of a company holding Title II authorizations and Title III licenses by a Bermuda company.⁸

Completion of the proposed transaction between LLA and AT&T also will serve the public interest. The comprehensive public interest statement included with lead wireless application File No. 0008836370 sets forth in detail the following public interest benefits that LLA anticipates will result from the proposed transaction:

- Enhancing network resiliency and redundancy in Puerto Rico and USVI through burying substantial portions of LCPR’s core network in AT&T Mobility PR’s conduit and having alternative fiber routes in and to Puerto Rico and USVI;
- Increasing competition to the ILECs in Puerto Rico and USVI by enabling LCPR to provide a “quad play” of communications services to consumers in Puerto Rico, improving the quality and reliability of both fixed and wireless services to consumers, and potentially deploying fixed services in USVI;

⁶ See *Cable & Wireless USA, Inc. Application for Authority to Operate as a Facilities-Based Carrier in Accordance with the Provisions of Section 63.18(e)(4) of the Rules Between the United States and Bermuda*, Authorization and Certificate, 15 FCC Rcd. 3050 (Int’l Bur 2000), at ¶7 (relying on a State Department opinion that the 1994 Marrakesh Agreement establishing the WTO applies to Bermuda as a dependent territory of the United Kingdom).

⁷ See *United States—Bermuda: A Special Relationship*, U.S. Department of State, United States of America, U.S. Consulate General in Bermuda (last visited Nov. 6, 2019); <https://bm.usconsulate.gov/our-relationship/policy-history/io/>.

⁸ See *Intelsat Holdings, Ltd. Transferor and Serafina Holdings Limited, Transferee*, 22 FCC Rcd. 22151 (2007) (granting applications for consent to transfer control of Title II authorizations and Title III licenses to a Bermuda company).

- Optimizing the mobile network and its operation in Puerto Rico by providing wireline backhaul through LCPR's network and increasing network redundancy and improving operations, including better frequency coordination between the mobile networks in the British Virgin Islands and USVI; and
- Intensifying the local focus for wireless services in Puerto Rico and USVI through experienced local management and increased local facilities.

These transaction-specific benefits are discussed in the Public Interest Statement at 10-17.

Grant of this declaratory ruling petition also will facilitate LLA's access to domestic and foreign sources of capital as it implements these transaction-specific benefits. Specifically, LLA expects that it would be able to accept strategic foreign investment and access foreign capital at potentially lower costs following grant of this petition. As the FCC has recognized, "foreign investment has been and will continue to be an important source of financing for U.S. telecommunications companies, fostering technical innovation, economic growth, and job creation."⁹ Finally, issuance of the requested declaratory ruling will promote competition with Puerto Rico Telephone Company ("Claro PR"), the ILEC and wireless services provider in Puerto Rico. Claro PR is a wholly-owned subsidiary of América Móvil, S.A.B. de C.V., which is organized under the laws of Mexico, and has been authorized by the FCC to accept foreign investment since 2007.¹⁰

⁹ See *Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licenses Under Section 310(b)(4) of the Communications Act, as Amended*, 28 FCC Rcd. 5741 (2013), at ¶3.

¹⁰ See *Verizon Communications, Inc., Transferor, and América Móvil, S.A.B. de C.V., Transferee, Applications for Authority to Transfer Control of Telecomunicaciones de Puerto Rico, Inc.*, 22 FCC Rcd. 6195 (2007).

INFORMATION REQUIRED PURSUANT TO 47 C.F.R. §1.5001

1.5001(a): Contact Information, FRN, Place of Organization, Type of Business Organization and Name and Title of Officer Certifying to the Information Contained in the Petition

Name: Liberty Latin America Ltd.
FRN: 0027016898
Mailing Address: 2 Church Street, Hamilton, Bermuda HM 11 (principal executive offices); 1550 Wewatta Street, Suite 1000, Denver, CO 80202 (U.S. executive offices)
Place of Organization: Bermuda
Telephone: (303) 925-6000
Email Address: j@lla.com
Type of Business: Bermuda company limited by shares
Certifying Officer: John M. Winter, Senior Vice President & Chief Legal Officer

1.5001(b): Legal Counsel Contact

Name: Robert L. Hoegle, Nelson Mullins Riley & Scarborough LLP
Mailing Address: 101 Constitution Avenue, NW, Ste. 900, Washington, DC 20005
Telephone: (202) 689-2816
Email Address: bob.hoegle@nelsonmullins.com

1.5001(c)(1): Licensees and Licenses Covered by Declaratory Ruling

A list of the licenses/call signs and the types of radio and other authorizations held by AT&T Mobility PR and AT&T Mobility USVI is attached as Schedule 1.

1.5001(c)(2): Associated Applications

LLA and AT&T are filing six transfer of control and other applications in connection with the transaction. The ULS file numbers for the wireless license Form 603 applications, which are being filed contemporaneously, are: 0008836370 (lead), 0008836373, 0008857446 and 0008857453. The file numbers for the transfer of control applications for the international and domestic Section 214 authorizations held by AT&T Mobility PR and the international Section 214 authorization held by AT&T Mobility USVI are ITC-T/C-20191107-00179 and ITC-T/C-20191107-00178, respectively.

1.5001(d): Declaratory Ruling Basis

LLA seeks a declaratory ruling pursuant to 47 C.F.R. §1.5000(a)(1).

1.5001(e)(1), (e)(4)(ii) & (g)(1): Disclosable Direct Interest Holders in Controlling U.S. Parent Beach Holding Corporation ("Beach")¹¹

The following entity will hold a 10 percent or greater direct equity/voting interest in controlling U.S. parent Beach following completion of the transaction:

Name: LLA Holdco LLC
Mailing Address: 1550 Wewatta Street, Suite 1000
Denver, CO 80202
Citizenship: Delaware
Percentage Held: 100 percent direct equity/voting interest in Beach

1.5001(f)(1) & (g)(1): Disclosable Indirect Interest Holders in Controlling U.S. Parent

The following individual and entities will hold a 10 percent or greater indirect equity/voting interest in controlling U.S. parent Beach:

Name: LCPR Ventures LLC
Mailing Address: 1550 Wewatta Street, Suite 1000,
Denver, CO 80202
Citizenship: Delaware
Percentage Held: 100 percent indirect equity/voting interest in Beach

The following entity will hold a direct 100 percent equity/voting interest in LCPR Ventures LLC:

Name: Leo Cable LP
Mailing Address: 1550 Wewatta Street, Suite 1000
Denver, CO 80202
Citizenship: Delaware
Percentage Held: 100 percent indirect equity/voting interest in Beach

The following entity will hold a direct 60 percent equity/voting interest in Leo Cable LP:

Name: LiLAC Ventures Ltd.
Mailing Address: 2 Church Street, Hamilton, Bermuda HM 11
Citizenship: Cayman Islands
Percentage Held: 60 percent indirect equity/voting interest in Beach

¹¹ Following completion of the proposed transaction, Beach will be the controlling U.S. parent of licensees AT&T Mobility PR and AT&T Mobility USVI. See Exhibit 1, Post-Transaction Ownership Structure.

The following entity will hold a direct 40 percent equity/voting interest in Leo Cable LP:

Name: LiLAC Communications Inc.
Mailing Address: 1550 Wewatta Street, Suite 1000,
Denver, CO 80202
Citizenship: Delaware
Percentage Held: 40 percent indirect equity/voting interest in Beach

The following entity will hold a direct 100 percent equity/voting interest in LiLAC Communications Inc.:

Name: LGI International Holdings, LLC
Mailing Address: 1550 Wewatta Street, Suite 1000
Denver, CO 80202
Citizenship: Colorado
Percentage Held: 100 percent indirect equity/voting interest in Beach

The following entity will hold a direct 100 percent equity/voting interest in LGI International Holdings, LLC:

Name: LiLAC Services Ltd.¹²
Mailing Address: 2 Church Street, Hamilton, Bermuda HM 11
Citizenship: Bermuda
Percentage Held: 100 percent indirect equity/voting interest in Beach

The following entity will hold a direct 100 percent equity/voting interest in LiLAC Services Ltd.:

Name: Liberty Latin America Ltd.
Mailing Address: 2 Church Street, Hamilton, Bermuda HM 11 (principal executive offices); 1550 Wewatta Street, Suite 1000, Denver, CO 80202 (U.S. executive offices)
Citizenship: Bermuda
Percentage Held: 100 percent indirect equity/voting interest in Beach

The following individual will hold a direct 10 percent or greater interest in Liberty Latin America Ltd.:

Name: John C. Malone
Mailing Address: c/o 1550 Wewatta Street, Suite 1000, Denver, CO 80202
Citizenship: United States
Percentage Held: 25.07 percent indirect voting and 5.65 percent indirect equity interest in Beach

¹² LiLAC Services Ltd. also will hold a direct 100 percent equity/voting interest in LiLAC Ventures Ltd. See Exhibit 1, Post-Transaction Ownership Structure.

There are no other intervening entities or limited partners in the ownership chain of controlling U.S. parent Beach.

1.5001(h)(1): Estimate of Aggregate Foreign Ownership

LLA is organized under the laws of Bermuda. LLA has determined that U.S. persons own: (1) 37,547,625 Class A Common Shares (approximately 80 percent of total Class A Shares outstanding); and (2) 1,865,201 Class B Common Shares (approximately 96 percent of total Class B shares outstanding). Thus, on an aggregate basis, U.S. persons hold approximately 83 percent of LLA's voting interests. With respect to equity ownership, LLA has determined that, of the total 181,064,520 outstanding common shares of LLA (Classes A, B and C), 122,821,717 shares are owned by U.S. persons. U.S. persons therefore own 67.8 percent of LLA's aggregate outstanding equity. The sources of information for these estimates of aggregate foreign ownership are discussed at pages 4-5 above.

1.5001(h)(2): Ownership Chart

A chart depicting the post-closing ownership and control structure of AT&T Mobility PR, AT&T Mobility USVI and Beach is attached as Exhibit 1.

1.5001(i): Requests for Specific Approval¹³

LLA requests specific approval for it to hold an indirect 100 percent equity/voting interest in Beach, and an indirect 100 percent equity/voting interest in AT&T Mobility PR and AT&T Mobility USVI.

Name:	Liberty Latin America Ltd.
Place of Organization:	Bermuda
Type of Business:	Company limited by shares
Principal Businesses:	Communications and entertainment services

LiLAC Services Ltd. requests specific approval for it to hold an indirect 100 percent equity/voting interest in Beach, and an indirect 100 percent equity/voting interest in AT&T Mobility PR and AT&T Mobility USVI.

Name:	LiLAC Services Ltd.
Place of Organization:	Bermuda
Type of Business:	Company limited by shares
Principal Business:	Holding company

¹³ Ashe Capital Management, LP ("Ashe"), a registered investment adviser, holds 5 percent of LLA's voting power. See 2019 Proxy Statement at 15. Based upon Ashe's Schedule 13G for the year ended December 31, 2018, filed with the SEC on February 14, 2019, Ashe is a limited partnership organized under the laws of Delaware and each of its principals is a U.S. citizen.

LiLAC Ventures Ltd, requests specific approval for it to hold an indirect 60 percent equity/voting interest in Beach, and in indirect 60 percent equity/voting interest in AT&T Mobility PR and AT&T Mobility USVI.

Name: LiLAC Ventures Ltd.
Place of Organization: Cayman Islands
Type of Business: Limited company
Principal Business: Holding company

Genesis Asset Managers, LLP (“Genesis”), an investment advisor to institutional investors and in-house pooled funds for institutional advisors, organized under the laws of Delaware with a principal business address in Guernsey, Channel Islands, holds 8.4 percent of LLA’s voting power. See 2019 Proxy Statement at 15. Based upon Genesis’s Schedule 13G for the year ended December 31, 2018, filed with the SEC on January 25, 2019, Genesis reports its beneficial ownership interest in LLA pursuant to Exchange Act Rule 13d-1(b). LLA therefore is exempt from the requirement in Section 1.5001(i) of the Rules to request specific approval for the ownership interest held by Genesis in LLA because such interest in LLA currently is no greater than 10 percent. See 47 C.F.R. §1.5001(i)(3).

However, LLA requests specific approval for Genesis to exceed the 10 percent ownership threshold for institutional investors up to and including a non-controlling equity and voting interest of 15 percent. Because LLA is a public company and Genesis presently holds an 8.4% voting interest, LLA seeks such approval to accommodate ordinary-course stock purchases by Genesis which could cause it to exceed the 10 percent threshold.

Name: Genesis Asset Managers, LLP
Place of Organization: Delaware
Type of Business: Limited liability partnership
Principal Business: Investment advisor

1.5001(k): Request for Advance Approval

LLA does not seek advance approval for specific foreign individuals or entities.


CONCLUSION

LLA respectfully requests approval of this petition for declaratory ruling to permit the indirect, ultimate ownership of AT&T Mobility PR and AT&T Mobility USVI by LLA. As demonstrated above and in the comprehensive public interest statement filed with the transfer of control applications, the transaction between LLA and AT&T will yield significant transaction-specific benefits for consumers in Puerto Rico and the USVI. In view of these

meaningful transaction-specific benefits, it would not serve the public interest to deny this petition based upon LLA's place of organization in Bermuda, a close ally and trading partner of the U.S., or LLA's aggregate equity ownership, when U.S. persons hold approximately 83 percent of LLA's aggregate voting interests.

December 12, 2019

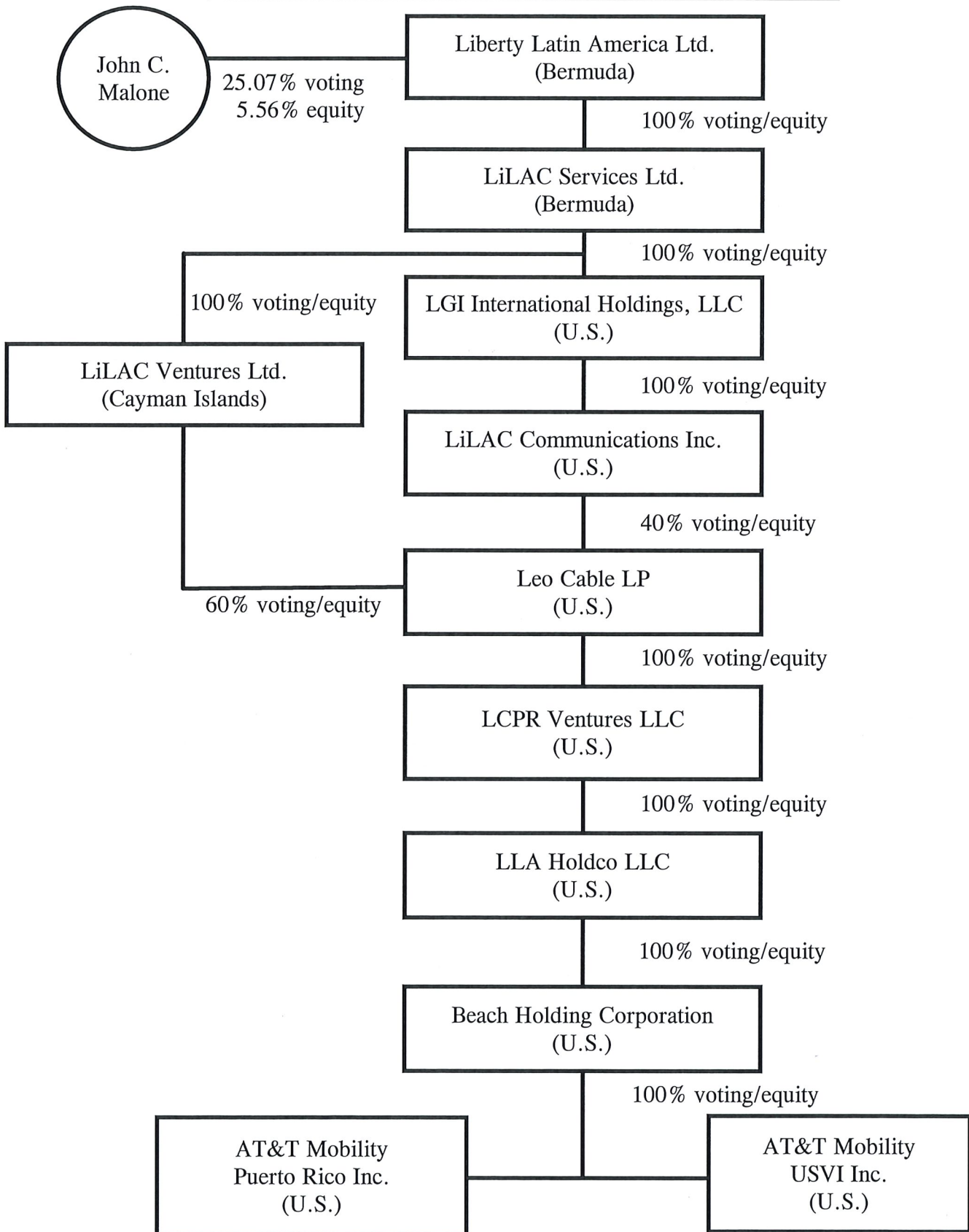
Respectfully submitted,
LIBERTY LATIN AMERICA LTD.

By: 
Robert L. Hoegle
Timothy J. Fitzgibbon
Thomas F. Bardo
Nelson Mullins Riley & Scarborough LLP
101 Constitution Avenue, NW, Suite 900
Washington, D.C. 20001

Its Attorneys

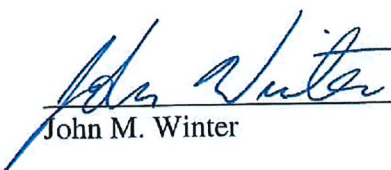
Section 1.5001(h)(2) Exhibit

POST-TRANSACTION OWNERSHIP STRUCTURE



DECLARATION

I, John M. Winter, Senior Vice President and Chief Legal Officer of Liberty Latin America Ltd., the filer of this Petition for Declaratory Ruling, state under penalty of perjury that: (1) the information contained in the foregoing Petition is accurate; and (2) all ownership interests disclosed in the Petition have been calculated based upon FCC rules and that the interests disclosed satisfy each of the pertinent standards and criteria set forth in the rules.



John M. Winter

12/19/19

Date

SCHEDULE 1

**FCC LICENSES AND AUTHORIZATIONS
HELD BY AT&T MOBILITY PR AND AT&T MOBILITY USVI**

AT&T Mobility Puerto Rico Inc. Licenses

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
WQIZ575	AT&T Mobility Puerto Rico Inc.	CMA723 - Puerto Rico 1 - Rincon	700 MHz Lower Band (Blocks A, B & E)	6/13/2029
WQJZ321	AT&T Mobility Puerto Rico Inc.	CMA726 - Puerto Rico 4 - Aibonito	700 MHz Lower Band (Blocks A, B & E)	6/13/2029
WQJZ322	AT&T Mobility Puerto Rico Inc.	CMA727 - Puerto Rico 5 - Ceiba	700 MHz Lower Band (Blocks A, B & E)	6/13/2029
WQKH488	AT&T Mobility Puerto Rico Inc.	CMA728 - Puerto Rico 6 - Vieques	700 MHz Lower Band (Blocks A, B & E)	6/13/2029
WQJZ323	AT&T Mobility Puerto Rico Inc.	CMA729 - Puerto Rico 7 - Culebra	700 MHz Lower Band (Blocks A, B & E)	6/13/2029
WPYZ858	AT&T Mobility Puerto Rico Inc.	CMA091 - San Juan-Caguas, PR	700 MHz Lower Band (Blocks C, D)	6/13/2029
WPYZ865	AT&T Mobility Puerto Rico Inc.	CMA147 - Ponce, PR	700 MHz Lower Band (Blocks C, D)	6/13/2029
WQDY921	AT&T Mobility Puerto Rico Inc.	CMA169 - Mayaguez, PR	700 MHz Lower Band (Blocks C, D)	6/13/2029
WQDY922	AT&T Mobility Puerto Rico Inc.	CMA202 - Arecibo, PR	700 MHz Lower Band (Blocks C, D)	6/13/2029
WPYZ874	AT&T Mobility Puerto Rico Inc.	CMA204 - Aguadilla, PR	700 MHz Lower Band (Blocks C, D)	6/13/2029
WPYZ935	AT&T Mobility Puerto Rico Inc.	CMA724 - Puerto Rico 2 - Adjuntas	700 MHz Lower Band (Blocks C, D)	6/13/2029
WPYZ936	AT&T	CMA725 - Puerto	700 MHz Lower Band	6/13/2029

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
	Mobility Puerto Rico Inc.	Rico 3 - Ciales	(Blocks C, D)	
WPYZ937	AT&T Mobility Puerto Rico Inc.	CMA726 - Puerto Rico 4 - Aibonito	700 MHz Lower Band (Blocks C, D)	6/13/2029
WQDY899	AT&T Mobility Puerto Rico Inc.	CMA727 - Puerto Rico 5 - Ceiba	700 MHz Lower Band (Blocks C, D)	6/13/2029
WPZA237 ¹⁴	New Cingular Wireless PCS, LLC	EAG703 - Southeast	700 MHz Lower Band (Blocks C, D)	6/13/2019 ¹⁵
WQVN881	AT&T Mobility Puerto Rico Inc.	BEA174 - Puerto Rico and the U.S. Virgin Islands	AW3-3	4/8/2027
WQYS531	AT&T Mobility Puerto Rico Inc.	BEA174 - Puerto Rico and the U.S. Virgin Islands	AWS	4/30/2022
WQGT859	AT&T Mobility Puerto Rico Inc.	CMA091 - San Juan-Caguas, PR	AWS	4/16/2022
WQGT863	AT&T Mobility Puerto Rico Inc.	CMA147 - Ponce, PR	AWS	4/16/2022
WQGT864	AT&T Mobility Puerto Rico Inc.	CMA169 - Mayaguez, PR	AWS	4/16/2022
WQGT865	AT&T Mobility Puerto Rico Inc.	CMA202 - Arecibo, PR	AWS	4/16/2022
WQGT866	AT&T Mobility Puerto Rico Inc.	CMA204 - Aguadilla, PR	AWS	4/16/2022
WQNN484	AT&T Mobility Puerto Rico Inc.	CMA723 - Puerto Rico 1 - Rincon	AWS	3/30/2026
WQNN485	AT&T Mobility Puerto Rico Inc.	CMA724 - Puerto Rico 2 - Adjuntas	AWS	3/30/2026

¹⁴ WPZA237 will be partitioned, and the partitioned spectrum in Puerto Rico and USVI will be transferred to AT&T Mobility PR and AT&T Mobility USVI, respectively.

¹⁵ License renewal application pending. See File No. 0008669032.

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
	Rico Inc.			
WQNN486	AT&T Mobility Puerto Rico Inc.	CMA725 - Puerto Rico 3 - Ciales	AWS	3/30/2026
WQNN487	AT&T Mobility Puerto Rico Inc.	CMA726 - Puerto Rico 4 - Aibonito	AWS	3/30/2026
WQNN488	AT&T Mobility Puerto Rico Inc.	CMA727 - Puerto Rico 5 - Ceiba	AWS	3/30/2026
KNKA785	AT&T Mobility Puerto Rico Inc.	CMA091 - San Juan-Caguas, P	Cellular	10/1/2028
KNKA467	AT&T Mobility Puerto Rico Inc.	CMA147 - Ponce, PR	Cellular	10/1/2027
KNKA451	AT&T Mobility Puerto Rico Inc.	CMA169 - Mayaguez, PR	Cellular	10/1/2027
KNKA804	AT&T Mobility Puerto Rico Inc.	CMA202 - Arecibo, PR	Cellular	10/1/2020
KNKA627	AT&T Mobility Puerto Rico Inc.	CMA204 - Aguadilla, PR	Cellular	10/1/2028
KNKN682	AT&T Mobility Puerto Rico Inc.	CMA723 - Puerto Rico 1 - Rincon	Cellular	10/1/2021
KNKN843	AT&T Mobility Puerto Rico Inc.	CMA724 - Puerto Rico 2 - Adjuntas	Cellular	10/1/2021
KNKN517	AT&T Mobility Puerto Rico Inc.	CMA725 - Puerto Rico 3 - Ciales	Cellular	10/1/2021
KNKQ343	AT&T Mobility Puerto Rico Inc.	CMA726 - Puerto Rico 4 - Aibonito	Cellular	10/1/2024
WPVV300	AT&T Mobility Puerto Rico Inc.	CMA727 - Puerto Rico 5 - Ceiba	Cellular	10/1/2021
KNKQ362	AT&T	CMA728 - Puerto	Cellular	10/1/2023

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
	Mobility Puerto Rico Inc.	Rico 6 - Vieques		
KNKN521	AT&T Mobility Puerto Rico Inc.	CMA729 - Puerto Rico 7 - Culebra	Cellular	10/1/2020
WRBP938	AT&T Mobility Puerto Rico Inc.	Aguada	Common Carrier Fixed Point to Point Microwave	5/17/2028
WQWK778	AT&T Mobility Puerto Rico Inc.	Aguadilla	Common Carrier Fixed Point to Point Microwave	9/23/2025
WQWK779	AT&T Mobility Puerto Rico Inc.	Aguadilla	Common Carrier Fixed Point to Point Microwave	9/23/2025
WRBN217	AT&T Mobility Puerto Rico Inc.	Aibonito	Common Carrier Fixed Point to Point Microwave	5/3/2028
WRBP937	AT&T Mobility Puerto Rico Inc.	Anasco	Common Carrier Fixed Point to Point Microwave	5/17/2028
WRBC944	AT&T Mobility Puerto Rico Inc.	Arecibo	Common Carrier Fixed Point to Point Microwave	4/10/2028
WRBN227	AT&T Mobility Puerto Rico Inc.	Caguas	Common Carrier Fixed Point to Point Microwave	5/3/2028
WQAG335	AT&T Mobility Puerto Rico Inc.	Cayey	Common Carrier Fixed Point to Point Microwave	5/25/2024
WQJM491	AT&T Mobility Puerto Rico Inc.	Cayey	Common Carrier Fixed Point to Point Microwave	11/4/2028
WRBN486	AT&T Mobility Puerto Rico Inc.	Cayey	Common Carrier Fixed Point to Point Microwave	5/7/2028
WPUP641	AT&T Mobility Puerto Rico Inc.	Ceiba	Common Carrier Fixed Point to Point Microwave	4/9/2022
WQQA417	AT&T Mobility Puerto Rico Inc.	Ceiba	Common Carrier Fixed Point to Point Microwave	10/3/2022

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
WQUF812	AT&T Mobility Puerto Rico Inc.	Cidra	Common Carrier Fixed Point to Point Microwave	6/25/2024
WQUF813	AT&T Mobility Puerto Rico Inc.	Cidra	Common Carrier Fixed Point to Point Microwave	6/25/2024
WPUV227	AT&T Mobility Puerto Rico Inc.	Comerio	Common Carrier Fixed Point to Point Microwave	5/8/2022
WRBK543	AT&T Mobility Puerto Rico Inc.	Corozal	Common Carrier Fixed Point to Point Microwave	4/11/2028
WRBK549	AT&T Mobility Puerto Rico Inc.	Corozal	Common Carrier Fixed Point to Point Microwave	4/11/2028
WPUU430	AT&T Mobility Puerto Rico Inc.	Dewey	Common Carrier Fixed Point to Point Microwave	5/6/2022
WQQA416	AT&T Mobility Puerto Rico Inc.	Fajardo	Common Carrier Fixed Point to Point Microwave	10/3/2022
WQQC881	AT&T Mobility Puerto Rico Inc.	Guayama	Common Carrier Fixed Point to Point Microwave	11/1/2022
WQQC882	AT&T Mobility Puerto Rico Inc.	Guayama	Common Carrier Fixed Point to Point Microwave	11/1/2022
WQQC883	AT&T Mobility Puerto Rico Inc.	Guayama	Common Carrier Fixed Point to Point Microwave	11/1/2022
WRBN289	AT&T Mobility Puerto Rico Inc.	Guayama	Common Carrier Fixed Point to Point Microwave	5/4/2028
WRBN355	AT&T Mobility Puerto Rico Inc.	Isabela	Common Carrier Fixed Point to Point Microwave	5/4/2028
WRBC946	AT&T Mobility Puerto Rico Inc.	Jayuya	Common Carrier Fixed Point to Point Microwave	4/10/2028
WRBC949	AT&T Mobility Puerto Rico Inc.	Jayuya	Common Carrier Fixed Point to Point	4/10/2028

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
	Rico Inc.		Microwave	
WQVB326	AT&T Mobility Puerto Rico Inc.	Juana Diaz	Common Carrier Fixed Point to Point Microwave	12/15/2024
WRBN358	AT&T Mobility Puerto Rico Inc.	Lares	Common Carrier Fixed Point to Point Microwave	5/4/2028
WRBP939	AT&T Mobility Puerto Rico Inc.	Las Marias	Common Carrier Fixed Point to Point Microwave	5/17/2028
WRBN352	AT&T Mobility Puerto Rico Inc.	Maricao	Common Carrier Fixed Point to Point Microwave	5/4/2028
WQMF321	AT&T Mobility Puerto Rico Inc.	Maunabo	Common Carrier Fixed Point to Point Microwave	7/22/2020
WRBP637	AT&T Mobility Puerto Rico Inc.	Naranjito	Common Carrier Fixed Point to Point Microwave	5/15/2028
WRBC957	AT&T Mobility Puerto Rico Inc.	Orocovis	Common Carrier Fixed Point to Point Microwave	4/10/2028
WRBN627	AT&T Mobility Puerto Rico Inc.	Orocovis	Common Carrier Fixed Point to Point Microwave	5/8/2028
WQVB327	AT&T Mobility Puerto Rico Inc.	Pastillo	Common Carrier Fixed Point to Point Microwave	12/15/2024
WPOR533	AT&T Mobility Puerto Rico Inc.	Ponce	Common Carrier Fixed Point to Point Microwave	2/1/2021
WQPW565	AT&T Mobility Puerto Rico Inc.	Salinas	Common Carrier Fixed Point to Point Microwave	8/30/2022
WQXT826	AT&T Mobility Puerto Rico Inc.	Salinas	Common Carrier Fixed Point to Point Microwave	6/7/2026
WRBM963	AT&T Mobility Puerto Rico Inc.	Salinas	Common Carrier Fixed Point to Point Microwave	5/3/2028

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
WRBN216	AT&T Mobility Puerto Rico Inc.	Salinas	Common Carrier Fixed Point to Point Microwave	5/3/2028
WPTD757	AT&T Mobility Puerto Rico Inc.	San Juan	Common Carrier Fixed Point to Point Microwave	9/6/2021
WQJD496	AT&T Mobility Puerto Rico Inc.	San Juan	Common Carrier Fixed Point to Point Microwave	7/31/2028
WQJM492	AT&T Mobility Puerto Rico Inc.	San Juan	Common Carrier Fixed Point to Point Microwave	11/4/2028
WRBP892	AT&T Mobility Puerto Rico Inc.	San Sebastian	Common Carrier Fixed Point to Point Microwave	5/17/2028
WRBK539	AT&T Mobility Puerto Rico Inc.	Toa Baja	Common Carrier Fixed Point to Point Microwave	4/11/2028
WRDY482	AT&T Mobility Puerto Rico Inc.	Naguabo	Common Carrier Fixed Point to Point Microwave	8/20/2029
WRDZ437	AT&T Mobility Puerto Rico Inc.	Guaynabo	Common Carrier Fixed Point to Point Microwave	8/27/2029
WRDZ438	AT&T Mobility Puerto Rico Inc.	Villa Magna	Common Carrier Fixed Point to Point Microwave	8/27/2029
WPVV207	AT&T Mobility Puerto Rico Inc.	Vieques	Common Carrier Fixed Point to Point Microwave	9/10/2022
WPNF232	AT&T Mobility Puerto Rico Inc.	Yabucoa	Common Carrier Fixed Point to Point Microwave	2/1/2021
WPZA270	AT&T Mobility Puerto Rico Inc. (pending assignment from 700 MHz,	CMA728—Puerto Rico 6—Vieques	700 MHz Lower Band (Block C, D)	6/13/2019 ¹⁶

¹⁶ License renewal application is pending. See File No. 0008685488.

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
	LLC)			
WQBN422	AT&T Mobility Puerto Rico Inc.	MTA025—Puerto Rico—US Virgin Islands	PCS Broadband	6/23/2025
WQBN423	AT&T Mobility Puerto Rico Inc.	MTA025—Puerto Rico—US Virgin Islands	PCS Broadband	6/23/2025
KNLF250	AT&T Mobility Puerto Rico Inc.	MTA025 - Puerto Rico-US Virgin Islands	PCS Broadband	6/23/2025
WQYS338	AT&T Mobility Puerto Rico Inc.	BEA174 - Puerto Rico and the U.S. Virgin Islands	Wireless Communications Service	9/13/2021
WQYS339	AT&T Mobility Puerto Rico Inc.	BEA174 - Puerto Rico and the U.S. Virgin Islands	Wireless Communications Service	9/13/2021
WQYS340	AT&T Mobility Puerto Rico Inc.	MEA050 - Puerto Rico and U.S. Virgin Islands	Wireless Communications Service	9/13/2021
WQYS341	AT&T Mobility Puerto Rico Inc.	MEA050 - Puerto Rico and U.S. Virgin Islands	Wireless Communications Service	9/13/2021
UU-PEA412-E****	AT&T Spectrum Frontiers LLC (To Be Assigned to AT&T Mobility Puerto Rico Inc.)	PEA412 - Puerto Rico	Upper Microwave Flexible Use Service	
UU-PEA412-F****	AT&T Spectrum Frontiers LLC (To Be Assigned to AT&T Mobility Puerto Rico Inc.)	PEA412 - Puerto Rico	Upper Microwave Flexible Use Service	

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
UU-PEA412-G****	AT&T Spectrum Frontiers LLC (To Be Assigned to AT&T Mobility Puerto Rico Inc.)	PEA412 - Puerto Rico	Upper Microwave Flexible Use Service	
International Section 214 Authorizations				
Authorization File No.	Description			
ITC-214-19930315-00040	Authorization to provide international switched services by reselling the international switched services of other carriers.			
ITC-214-19940107-00011	Authorization to provide international switched services by reselling the international switched services of other carriers.			
ITC-214-19980918-00669	Authorization to operate a facilities-based carrier in accordance with the provisions of Section 63.18(e)(1) of the rules.			

AT&T Mobility USVI Inc. Licenses

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
L000031145	AT&T Mobility USVI Inc.	CMA730 - Virgin Islands 1 - St. Thomas	700 MHz Lower Band (Blocks A, B & E)	6/13/2019 ¹⁷
L000031146	AT&T Mobility USVI Inc.	CMA731 - Virgin Islands 2 - St. Croix I	700 MHz Lower Band (Blocks A, B & E)	6/13/2019
WPWV264	AT&T Mobility USVI Inc.	CMA730 - Virgin Islands 1 - St. Thomas	700 MHz Lower Band (Blocks C, D)	6/13/2029
WPWV265	AT&T Mobility USVI Inc.	CMA731 - Virgin Islands 2 - St. Croix I	700 MHz Lower Band (Blocks C, D)	6/13/2029
WQYS532	AT&T Mobility USVI Inc.	BEA174 - Puerto Rico and the U.S. Virgin Islands	AWS	4/30/2022
KNKN524	AT&T Mobility USVI Inc.	CMA730 - Virgin Islands 1 - St. Thomas	Cellular	10/1/2020
KNKN523	AT&T Mobility USVI Inc.	CMA731 - Virgin Islands 2 - St. Croix I	Cellular	10/1/2020
WQLX299	AT&T Mobility USVI Inc.	Charlotte Amalie	Common Carrier Fixed Point to Point Microwave	5/7/2020
WQOQ806	AT&T Mobility USVI Inc.	Christiansen	Common Carrier Fixed Point to Point Microwave	12/29/2021
WQEN351	AT&T Mobility USVI Inc.	Christiansted	Common Carrier Fixed Point to Point Microwave	3/9/2026
WQKB373	AT&T Mobility USVI Inc.	Christiansted	Common Carrier Fixed Point to Point Microwave	3/17/2029
WQRU536	AT&T Mobility USVI Inc.	Christiansted	Common Carrier Fixed Point to Point Microwave	7/29/2023
WQSU321	AT&T Mobility USVI Inc.	Christiansted	Common Carrier Fixed Point to Point Microwave	11/15/2023

¹⁷ Application to extend L000031145 and L000031146 is pending. See File No. 0008653900.

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
WRCZ455	AT&T Mobility USVI Inc.	Mt. Plessem	Common Carrier Fixed Point to Point Microwave	3/5/2029
WMS665	AT&T Mobility USVI Inc.	Saint Croix	Common Carrier Fixed Point to Point Microwave	2/1/2021
WMT773	AT&T Mobility USVI Inc.	Saint Croix	Common Carrier Fixed Point to Point Microwave	2/1/2021
WPJA861	AT&T Mobility USVI Inc.	Saint Croix	Common Carrier Fixed Point to Point Microwave	2/1/2021
WPNG917	AT&T Mobility USVI Inc.	Saint Croix	Common Carrier Fixed Point to Point Microwave	2/1/2021
WQLP875	AT&T Mobility USVI Inc.	Saint Croix	Common Carrier Fixed Point to Point Microwave	3/24/2020
WQLT836	AT&T Mobility USVI Inc.	Saint Croix	Common Carrier Fixed Point to Point Microwave	4/23/2020
WQKI996	AT&T Mobility Puerto Rico Inc.	Saint George	Common Carrier Fixed Point to Point Microwave	6/9/2029
WMN454	AT&T Mobility USVI Inc.	Saint John	Common Carrier Fixed Point to Point Microwave	2/1/2021
WQRH410	AT&T Mobility USVI Inc.	Saint John	Common Carrier Fixed Point to Point Microwave	5/14/2023
WMN657	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	2/1/2021
WMN658	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	2/1/2021
WPNG921	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	2/1/2021
WQAY884	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	8/3/2024
WQBE744	AT&T Mobility USVI	Saint Thomas	Common Carrier Fixed Point to Point	9/28/2024

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
	Inc.		Microwave	
WQDS855	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	10/24/2025
WQKQ400	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	8/11/2029
WQKQ401	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	8/11/2029
WQLW519	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	5/11/2020
WQX865	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	3/21/2023
WQRH409	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	5/14/2023
WQRQ526	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	7/9/2023
WQRU544	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	7/29/2023
WQSS386	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	11/6/2023
WQTT346	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	4/8/2024
WQTT347	AT&T Mobility USVI Inc.	Saint Thomas	Common Carrier Fixed Point to Point Microwave	4/8/2024
WQQQ244	AT&T Mobility USVI Inc.	BTA491 - US Virgin Islands	PCS Broadband	6/23/2025
WQYT630	AT&T Mobility USVI Inc.	BEA174 - Puerto Rico and the U.S. Virgin Islands(Partial Market - U.S. Virgin Islands only)	Wireless Communications Service	9/13/2021

Wireless Licenses				
Call Sign	Licensee	Geographic Location/ Coverage Area	Radio Service	Expiration
WQYT631	AT&T Mobility USVI Inc.	BEA174 - Puerto Rico and the U.S. Virgin Islands	Wireless Communications Service	9/13/2021
WQYT632	AT&T Mobility USVI Inc.	MEA050 - Puerto Rico and U.S. Virgin Islands	Wireless Communications Service	9/13/2021
WQYT633	AT&T Mobility USVI Inc.	MEA050 - Puerto Rico and U.S. Virgin Islands	Wireless Communications Service	9/13/2021
UU-PEA414-F****	AT&T Spectrum Frontiers LLC (To Be Assigned to AT&T Mobility USVI Inc.)	PEA414 - US Virgin Islands	Upper Microwave Flexible Use Service	
UU-PEA414-G****	AT&T Spectrum Frontiers LLC (To Be Assigned to AT&T Mobility USVI Inc.)	PEA414 - US Virgin Islands	Upper Microwave Flexible Use Service	

International Section 214 Authorization	
Authorization File No.	Description
ITC-214-20001101-00664	Application for authority to resell the switched services of unaffiliated U.S. international carriers pursuant to section 63.18(e)(2) of the Commission's rules.