

July 29, 2021

**Via International Bureau Filing System**

Kimberly Cook  
Deputy Chief, Telecommunications and Analysis Division  
International Bureau  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**Re: IBFS File No. ISP-PDR-20210202-00003; High Band Holdings, LLC Petition for Declaratory Ruling Under Section 310(b)(4) of the Communications Act of 1934, As Amended**

Dear Ms. Cook:

With respect to its Petition for Declaratory Ruling filed in the above-referenced IBFS file number, High Band Holdings, LLC affirms the following facts:

1. The HarbourVest entities and Railways Pension entities<sup>1</sup> are insulated pursuant to the criteria outlined in Sections 1.5003(b)-(c).<sup>2</sup>
2. High Band Holdings requests up to 45 percent indirect foreign ownership of High Band License Co, LLC.
3. Telcom CTM Spectrum, LLC is a limited liability company organized in Delaware.
4. Rajendra Singh and Neera Singh are both citizens of the United States of America.

Please let me know if you have any further questions.

Sincerely,

/s/ Trey Hanbury

Trey Hanbury  
(202) 637-5534  
trey.hanbury@hoganlovells.com

*Counsel to High Band Holdings, LLC*

---

<sup>1</sup> The HarbourVest entities are: (1) HarbourVest Partners Co-Investment Fund V L.P.; (2) HarbourVest Partners XI Venture Fund L.P.; (3) HarbourVest Partners Co-Investment V AIF L.P.; (4) HarbourVest Partners XI Venture AIF L.P.; (5) HarbourVest Co-Investment V Associates L.P.; (6) HarbourVest GP LLC; and (7) HarbourVest Partners, LLC. The Railways Pension entities are: (1) Railways Pension Trustee Company Limited; and (2) Railtrust Holdings Limited. See IBFS File No. ISP-PDR-20210202-00003, Petition for Declaratory Ruling at 14-17 (Feb. 2, 2021).

<sup>2</sup> 47 C.F.R. §§ 1.5003(b)-(c).