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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 entities¹ are insulated pursuant to the criteria outlined in Sections 1.5003(b)-(c).²
- 2. High Band Holdings requests up to <u>45 percent</u> 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,

<u>/s/ Trey Hanbury</u> Trey Hanbury (202) 637-5534 trey.hanbury@hoganlovells.com

Counsel to High Band Holdings, LLC

¹ 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).

² 47 C.F.R. §§ 1.5003(b)-(c).

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