

Hogan Lovells US LLP Columbia Square 555 Thirteenth Street, NW Washington, DC 20004 T +1 202 637 5600 F +1 202 637 5910 www.hoganlovells.com

September 16, 2021

Via International Bureau Filing System

Marlene H. Dortch Secretary 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. Dortch:

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

- 1. No entity with an equity interest in Columbia Spectrum Partners III-A, L.P. holds an equity interest of 10 percent or greater in Petitioner or, by extension, High Band License Co, LLC ("Licensee").
- 2. On February 2, 2021, Licensee filed an application seeking Commission approval for a *pro* forma transfer of control of Petitioner that, if granted, will allow Petitioner to complete an internal reorganization.¹ The reorganization will decrease the voting interests held by Telcom CTM Spectrum, LLC ("Telcom") in Petitioner from 50 percent to 0.59 percent and increase the voting interests held by Columbia Capital-related entities from 50 percent to 50.32 percent.² Consequently, Telcom and the Columbia Capital-related entities will no longer jointly control Petitioner, and the Columbia Capital-related entities will assume majority control.³

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 See ULS File No. 0009359525.

² See ULS File No. 0009359525, Description of Transaction at 1 (Jan. 7, 2021).

³ See id.

Hogan Lovells US LLP is a limited liability partnership registered in the District of Columbia. "Hogan Lovells" is an international legal practice that includes Hogan Lovells US LLP and Hogan Lovells International LLP, with offices in: Alicante Amsterdam Baltimore Beijing Birmingham Boston Brussels Colorado Springs Denver Dubai Dusseldorf Frankfurt Hamburg Hanoi Ho Chi Minh City Hong Kong Houston Johannesburg London Los Angeles Luxembourg Madrid Mexico City Miami Milan Minneapolis Monterrey Moscow Munich New York Northern Virginia Paris Perth Philadelphia Rome San Francisco São Paulo Shanghai Silicon Valley Singapore Sydney Tokyo Warsaw Washington, D.C. Associated Offices: Budapest Jakarta Riyadh Shanghai FTZ Ulaanbaatar. Business Service Centers: Johannesburg Louisville. Legal Services Center: Berlin. For more information see www.hoganlovells.com