

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.<sup>1</sup> 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.<sup>2</sup> Consequently, Telcom and the Columbia Capital-related entities will no longer jointly control Petitioner, and the Columbia Capital-related entities will assume majority control.<sup>3</sup>

Please let me know if you have any further questions.

Sincerely,

/s/ Trey Hanbury

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*Counsel to High Band Holdings, LLC*

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<sup>1</sup> See ULS File No. 0009359525.

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

<sup>3</sup> See *id.*