

Elizabeth R. Sachs

8300 Greensboro Dr.  
Suite 1200  
Tysons, VA 22102

NOT ADMITTED IN VA

lsachs@fcclaw.com  
(703) 584-8663  
WWW.FCCLAW.COM

**LLGS** | LUKAS  
LAFURIA  
GUTIERREZ  
& SACHS LLP

September 20, 2021

**VIA ELECTRONIC FILING**

Telecommunications and Analysis Division  
International Bureau  
Federal Communications Commission  
45 L St, N.E.  
Washington, DC 20554

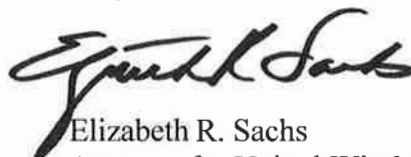
Re: Petition for Declaratory Ruling  
United Wireless Holdings, Inc.  
47 U.S.C. § 310(b)(4)

To Whom It May Concern:

Attached please find a Petition for Declaratory Ruling filed by United Wireless Holdings, Inc. and its affiliates, SkyTel Spectrum, LLC and A2G Communications, LLC. The petitioners have also attached a redacted copy of their responses to the standardized national security and law enforcement questions that are identified in the FCC's Public Notice as required for Executive Branch review of Petitions involving reportable foreign ownership of common carrier wireless licenses.<sup>1</sup> An unredacted copy is being submitted directly to the FCC under a Request for Confidential Treatment of certain information in the supplemental filing. It is hoped that including this more detailed information may assist both the Federal Communications Commission and the Executive Branch in their review of this Petition.

Please refer any questions or comments about these filings to the undersigned.

Very truly yours,



Elizabeth R. Sachs  
Attorney for United Wireless Holdings, Inc.

---

<sup>1</sup> *International Bureau Seeks Comment on Standard Questions for Applicants Whose Applications will be Referred to the Executive Branch for Review due to Foreign Ownership*, IB Docket No. 16-155, Public Notice, 35 FCC Rcd 14906 (2020).

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
United Wireless Holdings, Inc.	)	File No. ISP-PDR-2021-_____
	)	
Petition for Declaratory Ruling Under	)	
Section 310(b)(4) of the Communications	)	
Act of 1934, as Amended	)	

**PETITION FOR DECLARATORY RULING**

Pursuant to 47 C.F.R. § 1.5000 *et seq.*, United Wireless Holdings, Inc., a Delaware corporation (“Holdings”) and its affiliates SkyTel Spectrum, LLC, a Delaware limited liability company (“SkyTel”) and A2G Communications, LLC, a Delaware limited liability company (“A2G”) (collectively Holdings, SkyTel, and A2G are referred to herein as the “Petitioners”), hereby request a declaratory ruling approving foreign investment of up to 100% by Andrew Fitton, a U.K. citizen, through Fitton & Co., Ltd. (“Fitton & Co.”), a company organized under the laws of the U.K., which he co-owns with other U.K. citizens (this “Petition”). Holdings holds a 100% equity/voting interest in SkyTel and a 50% equity/voting interest in A2G. Petitioners request that this approval include ownership by Holdings of Part 22 Air-Ground Radiotelephone Service (“AGRAS”) facilities nationwide held by A2G as well as SkyTel’s ownership of paging and Narrowband PCS (“NPCS”) licenses.<sup>1</sup>

Such a ruling would be consistent with the Commission’s 2008 Declaratory Ruling<sup>2</sup> authorizing up to 100% indirect foreign ownership by Andrew Fitton in SkyTel for the provision

---

<sup>1</sup> AGRAS licenses authorize the provision of services to general aviation aircraft.

<sup>2</sup> International Authorizations Granted, *Public Notice*, DA 09-39 (rel. Jan. 15, 2009) (“2008 Declaratory Ruling”).

of paging and NPCS to the public. Because the Petition for Declaratory Ruling filed in 2008 (the “2008 Petition”) inadvertently did not specifically seek approval for foreign ownership of the AGRAS licenses that were included in the transaction by which SkyTel acquired its paging, NPCS, and AGRAS licenses, that license category was not addressed in the 2008 Declaratory Ruling. As the failure to include the AGRAS licenses was inadvertent and not noted by any party at the time, following the issuance of the 2008 Declaratory Ruling, FCC approval for the related transaction (covering all the licenses, including the AGRAS licenses) was granted<sup>3</sup> and these licenses have been owned and operated by Holdings’ affiliates for more than 13 years.

Since grant of the 2008 Declaratory Ruling, the foreign ownership in SkyTel and A2G has been meaningfully reduced due to the transfer of 30% ownership in Holdings to a U.S. citizen. In addition, Mr. Fitton transferred his personal interests into Fitton & Co., Ltd. (“Fitton & Co.”) a family entity over which he retains super-majority equity ownership and voting control. This affiliated family entity, which is under common control with Holdings, is organized in the U.K. As detailed below, the direct foreign ownership and control of Holdings (including directly proportional equity ownership and voting interests) has been reduced from 100% to 70% since the time of the 2008 Declaratory Ruling. Consequently, today, the total indirect foreign equity/voting interest in SkyTel is 70% and the total indirect foreign equity/voting interest in Holdings’ affiliate A2G is 35%.<sup>4</sup> Grant of this Petition will facilitate the immediate assignment of the SkyTel and A2G licenses to AURA Network Systems OpCo, LLC (“AURA”), an entity with no disclosable foreign ownership. It also would be consistent with FCC policy and precedent finding that foreign

---

<sup>3</sup> See ULS File 0003385370.

<sup>4</sup> For purposes of Section II, Holdings’ equal to or more than 50% voting interest in both SkyTel and A2G is treated as 100% voting interest in accordance with Rule Section 1.5002(2)(i).

investment serves the public interest by encouraging reciprocal investment opportunities for U.S. companies in countries around the world.

## **I. HISTORY OF HOLDINGS' FOREIGN OWNERSHIP**

The 2008 Declaratory Ruling was granted to Holdings in conjunction with an application whereby SkyTel proposed to acquire from Bell Industries, Inc. ("Bell") a number of wireless facilities and the related FCC authorizations.<sup>5</sup> The application was accompanied by the 2008 Petition from Holdings, a privately held U.S. corporation in which Andrew Fitton, a citizen of the United Kingdom, then held 100% equity/voting interest. The 2008 Petition sought approval for up to 100% indirect foreign ownership of Holdings' direct and indirect subsidiaries, including SkyTel.<sup>6</sup> The 2008 Petition stated that "United Sub...proposes to acquire wireless radio service licenses, subject to FCC consent, from Bell Industries, Inc...[t]hus, Holdings seeks the declaratory ruling requested herein in connection with the proposed...acquisition of licenses by United Sub." (The 2008 Petition also requested a declaratory ruling that was granted in connection with the transfer of control of an entity not relevant to this request.) The 2008 Petition referenced the continuation of Bell's paging and narrowband PCS operations following approval of the transaction but did not specifically reference the AGRAS operations.

The 2008 Declaratory Ruling was granted on December 9, 2008.<sup>7</sup> Like the 2008 Petition, it did not specifically identify the AGRAS licenses included in the Bell/SkyTel assignment application. It stated that the ruling "permits the indirect foreign ownership of SkyTel by Mr. Andrew Fitton (up to and including 100%)."<sup>8</sup> Further, the 2008 Declaratory Ruling specified that

---

<sup>5</sup> See n. 3 *supra*.

<sup>6</sup> The 2008 Petition identified SkyTel as "United Sub." The 2008 Declaratory Ruling recognized both names. See 2008 Declaratory Ruling at 2 (defining "SkyTel Spectrum LLC" as "United Sub").

<sup>7</sup> 2008 Declaratory Ruling at 2.

<sup>8</sup> *Id.*

SkyTel “may accept up to and including an additional aggregate 25 percent indirect foreign equity and/or voting interest from other foreign investors without seeking further Commission approval under section 310(b)(4).”<sup>9</sup> The assignment application from Bell to SkyTel, which included 58 AGRAS licenses covering facilities across the U.S. as well as nationwide paging and NPCS authorizations, received FCC consent the following day.<sup>10</sup> Upon notification to the FCC of the consummation of that transaction, the AGRAS licenses along with the other licenses in the application were reissued in SkyTel’s name. Over the next decade, SkyTel licensed additional AGRAS facilities, in each case pursuant to an application accompanied by the 2008 Declaratory Ruling.<sup>11</sup>

In 2010, SkyTel and Stratophone, LLC (“Stratophone”), the only other significant holder of AGRAS licenses in the U.S., submitted a joint request for waiver of certain FCC rules to combine their networks into a new nationwide system.<sup>12</sup> In 2019, each company assigned its AGRAS licenses to A2G, in which Holdings, SkyTel’s parent, and Stratophone each holds a 50% membership interest.<sup>13</sup> The AGRAS licenses held by A2G collectively authorize the use of thirteen 20 kHz bandwidth channels, representing a total of 0.65 MHz of spectrum, at sites throughout the country.<sup>14</sup>

Since issuance of the 2008 Declaratory Ruling, the foreign ownership of Petitioners has been diluted. By 2014, 30% of the equity/voting interest in Holdings had been transferred to

---

<sup>9</sup> *Id.*

<sup>10</sup> *See* n. 3, *supra*.

<sup>11</sup> *See, e.g.*, ULS File Nos. 0007518295 (requesting new authorization) and 0004552242 (requesting new frequencies to be added to existing authorization pursuant to a waiver).

<sup>12</sup> *See* Waiver Request of Stratophone, LLC and SkyTel Spectrum, LLC, WT Docket No. 09-44 (Feb. 24, 2009).

<sup>13</sup> Both assignment applications were filed on July 19, 2019: ULS File No 0008710727 (Stratophone) and ULS File No. 0008710635 (SkyTel). SkyTel, Stratophone, Holdings, and A2G now recognize that these assignment applications failed to disclose Holdings’ continued foreign ownership and the resulting indirect foreign ownership in A2G.

<sup>14</sup> A2G is limited to only seven 20 kHz bandwidth channels at sites in proximity to the U.S./Canada border.

Michael Carper, a U.S. citizen, thereby reducing Mr. Fitton's indirect equity/voting interest in Holdings to 70%. In 2016, as part of a tax and estate planning exercise, Mr. Fitton transferred his equity/voting position in Holdings to Fitton & Co, in which he retains 70.6% equity/voting interest while his wife, Rosalind Fitton (8.6% equity/voting interest), together with their children, Nina Fitton, Kit Fitton, William Fitton, and Ellen Fitton (each with 4.9% equity/voting interest), hold a combined 28.4% interest, and his longtime executive assistant, Clair Crabtree, holds a 1% equity/voting interest. All of these persons are U.K. citizens.<sup>15</sup> The 20.58% aggregate indirect interests in Holdings transferred to these other U.K. citizens were within the limit set forth in the 2008 Declaratory Ruling as not requiring further FCC approval. Through Fitton & Co, Mr. Fitton retains the controlling interest in Holdings, and thereby in SkyTel. This was true at the time when SkyTel assigned its AGRAS licenses to A2G, in which Holdings holds a 50% equity/voting interest. Stratophone, which holds the other 50% equity/voting interest in A2G, has 100% ownership by U.S. citizens. As a result, at the time of the assignment of the AGRAS licenses to A2G (and currently), the total indirect foreign equity/voting interest in A2G was (and is) 35% (via Fitton & Co.'s ownership in Holdings and Holdings' ownership in A2G), with 24.71% of that total interest attributable to Mr. Fitton.

The Petitioners now seek a declaratory ruling that approves the current foreign ownership of these entities and includes the AGRAS licenses, which, along with a single NPCS license, will be assigned to AURA, which has no disclosable foreign ownership interests, upon filing of the required applications and consent from the FCC. The AGRAS spectrum already is under AURA control and has been since 2019 when the FCC granted a Long-Term *De Facto* Transfer lease application filed by A2G and AURA.<sup>16</sup> AURA constructed and operates a nationwide AGRAS

---

<sup>15</sup> None of the United Kingdom citizens other than Mr. Fitton holds a 10% or greater interest in Fitton & Co.

<sup>16</sup> See ULS File No. 0008921242 (granted on December 24, 2019.)

network pursuant to that lease authority. Upon grant of the assignment application from A2G to AURA, AURA will assume both *de jure* and *de facto* control of that spectrum, as well as of the single NPCS channel.

## II. INFORMATION REQUIRED BY 47 C.F.R. § 1.5001

Pursuant to 47 C.F.R. § 1.5001, Holdings submits the following information in support of this Petition:

### A. Name, FRN, Contact Information, Place of Organization, Type of Business Organization, and Certification Information of Petitioner.<sup>17</sup>

United Wireless Holdings, Inc.  
FRN: 0016583965  
Delaware Corporation  
Michael R. Carper  
President and Chief Legal Officer  
P.O. Box 190  
Austin, TX 78767  
240-417-7670  
[mike.carper@unitedwirelessholdings.com](mailto:mike.carper@unitedwirelessholdings.com)

### B. Legal Counsel Contact Information<sup>18</sup>

Elizabeth R. Sachs  
Lukas, LaFuria, Gutierrez & Sachs, LLP  
8300 Greensboro Drive, Ste. 1200  
Tysons, VA 22102  
(703) 584-8678

### C. Type of Radio Service Authorization and Associated Application<sup>19</sup>

Petitioners seek a declaratory ruling to authorize Holdings' indirect foreign ownership interest in the paging, NPCS, and AGRAS licenses held by SkyTel since grant of the 2008 Declaratory Ruling and the indirect foreign ownership by Holdings of the AGRAS licenses

---

<sup>17</sup> 47 C.F.R. § 1.5001(a).

<sup>18</sup> *Id.* § 1.5001(b).

<sup>19</sup> *Id.* § 15001(c).

previously held by SkyTel and now held by A2G. This Petition is submitted in connection with applications requesting FCC approval of the transfer of the NPCS and AGRAS licenses from SkyTel and A2G, as applicable, to AURA on an expedited basis following grant of this Petition.

**D. Type of Declaratory Ruling<sup>20</sup>**

Petitioners seeks a declaratory ruling under 47 C.F.R. § 1.5000(a)(1).

**E. Direct and Indirect Equity and Voting Interests of 10 Percent or More<sup>21</sup>**

**Direct Ownership in SkyTel**

United Wireless Holdings, Inc.  
P.O. Box 190, Austin, TX 78767  
Delaware Corporation  
100% direct equity/voting interest in SkyTel with active role in its management and operation.  
Principal Business: Holding company for U.S. wireless communications businesses.

**Indirect Ownership in SkyTel**

Fitton & Co., Ltd.  
12 Old Palace Lane Richmond  
Surrey, TW9 1PG  
United Kingdom  
70% indirect equity interest with 100% voting interest in SkyTel through Holdings with active role in its management and operation.  
Principal Business: Family investment holding company.

Andrew Fitton  
c/o United Wireless Holdings, Inc., P.O. Box 190, Austin, TX 78767  
U.K. citizen  
49.40% indirect equity interest with 100% voting interest in Skytel through Fitton & Co. and Holdings with active role in its management and operation.  
Principal Business: Investor and business executive.

Michael Carper  
c/o United Wireless Holdings, Inc., P.O. Box 190, Austin, TX 78767  
U.S. citizen  
30% indirect equity/voting interest in SkyTel through Holdings with active role in its management and operation.  
Principal Business: Attorney and business executive.

---

<sup>20</sup> *Id.* § 1.5001(d).

<sup>21</sup> *Id.* § 1.5001(e), (f), and (g).



**Direct Ownership in A2G**

United Wireless Holdings, Inc.  
P.O. Box 190, Austin, TX 78767  
Delaware Corporation  
50% direct equity interest with 100% voting interest in A2G with active role in its management and operation.  
Principal Business: Holding company for U.S. wireless communications businesses.

Stratophone, LLC  
12788 SW Lake Fern Circle, Port St. Lucie, FL 34987  
Delaware limited liability company  
50% direct equity interest with 100% voting interest in A2G with active role in its management and operation.  
Principal Business: Air-to-ground wireless communications business owner.

**Indirect Ownership in A2G**

Fitton & Co., Ltd.  
12 Old Palace Lane Richmond  
Surrey, TW9 1PG  
United Kingdom  
35% indirect equity interest with 100% voting interest in A2G through Holdings with active role in its management and operation.  
Principal Business: Family investment holding company.

Andrew Fitton  
c/o United Wireless Holdings, Inc., P.O. Box 190, Austin, TX 78767  
Individual U.K. citizen  
24.71% indirect equity interest with 100% voting interest in A2G through Fitton & Co. and Holdings with active role in its management and operation.  
Principal Business: Investor and business executive.

Michael Carper  
c/o United Wireless Holdings, Inc., P.O. Box 190, Austin, TX 78767  
U.S. citizen  
15% indirect equity/voting interest in A2G through Holdings with active role in its management and operation.  
Principal Business: Investor and business executive.

Albert Gencarella  
12788 SW Lake Fern Circle, Port St. Lucie, FL 34987  
U.S. citizen  
45% indirect equity interest with 100% voting interest in A2G through Stratophone with active role in its management and operation.

Principal Business: Wireless communications business executive and investor.

**F. Estimate of Aggregate Foreign Ownership; Statement of Circumstances and Public Interest.<sup>22</sup>**

Non-U.S. entities and individuals indirectly control 70% of the equity and 100% voting interest in SkyTel and 35% of the equity and 100% voting interest in A2G. *See* Exhibit A.

This Petition is being filed in connection with FCC applications for the assignment of all A2G licenses and a SkyTel NPCC license to AURA, an entity with no disclosable foreign ownership interest. Neither Holdings nor SkyTel anticipate acquiring any equity or voting interest in any additional common carrier wireless licenses. The licenses held by A2G are the subject of a Long-Term *De Facto* Transfer Lease with AURA, which was approved by the Commission on December 24, 2019.

**G. Description of Ownership<sup>23</sup>**

*See* Exhibit B.

**H. Request for Specific Approval<sup>24</sup>**

Petitioner requests specific approval for the following foreign entities and individuals that directly or indirectly hold more than 5% of equity and/or voting interests in Holdings, A2G and/or SkyTel.

Fitton & Co., Ltd.

12 Old Palace Lane Richmond

Surrey, TW9 1PG

United Kingdom

70% direct equity interest with 100% voting interest in Holdings with active role in its management and operation.

35% indirect equity interest with 100% voting interest in A2G with active role in its management and operation.

70% indirect equity interest with 100% voting interest in SkyTel with active role in its management and operation

Andrew Fitton

c/o United Wireless Holdings, Inc., P.O. Box 190, Austin, TX 78767

Individual U.K. citizen

49.42% indirect equity interest with 100% voting interest in Holdings with active role in its management and operation.

---

<sup>22</sup> *Id.* § 1.5001(h)(1).

<sup>23</sup> *Id.* § 1.5001(h)(2).

<sup>24</sup> *Id.* § 1.5001(i-k).

24.71% indirect equity interest with 100% voting interest in A2G with active role in its management and operation.

49.42% indirect equity interest and 100% voting interest in SkyTel with active role in its management and operation.

Rosalind Fitton

c/o United Wireless Holdings, Inc., P.O. Box 190, Austin, TX 78767

Individual U.K. citizen

6.16% indirect equity/voting interest in Holdings with no role in its management or operation.

### **I. Request for Advance Approval<sup>25</sup>**

Petitioners request application of the routine terms and conditions set forth in Section 1.5004 of the Commission's rules. Petitioners request advance approval for Rosalind Fitton to increase her indirect equity interest in Holdings to a 55.58% equity interest with 100% voting interest in the event her husband, Andrew Fitton, predeceases her. In that event, her indirect equity interest in SkyTel would increase to 55.58% with 100% voting interest and her indirect equity interest in A2G would increase to 27.79% with 100% voting interest.

### **III CONCLUSION**

Petitioners respectfully request the FCC to issue a declaratory ruling confirming that it is in the public interest to allow the foreign ownership interests detailed herein.

Respectfully submitted,

United Wireless Holdings, Inc.  
SkyTel Spectrum, LLC  
A2G Communications, LLC



By: Michael R. Carper

President, United Wireless Holdings, Inc.,  
Managing Member SkyTel Spectrum, LLC,  
Vice President A2G Communications, LLC


---

<sup>25</sup> *Id.* § 1.5001(i)

DECLARATION OF UNITED WIRELESS HOLDINGS, INC.

I, Michael R. Carper, am President and Chief Legal Officer of United Wireless Holdings, Inc. (“Holdings”) and am authorized to make this declaration on behalf of Holdings, SkyTel, and A2G. I certify that to the best of my knowledge and belief the information contained in the foregoing Petition for Declaratory Ruling is true and correct and that the disclosures satisfy each of the pertinent standards and criteria set forth in the Federal Communications Commission rules at 47 C.F.R. § 1.5001 *et seq.*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



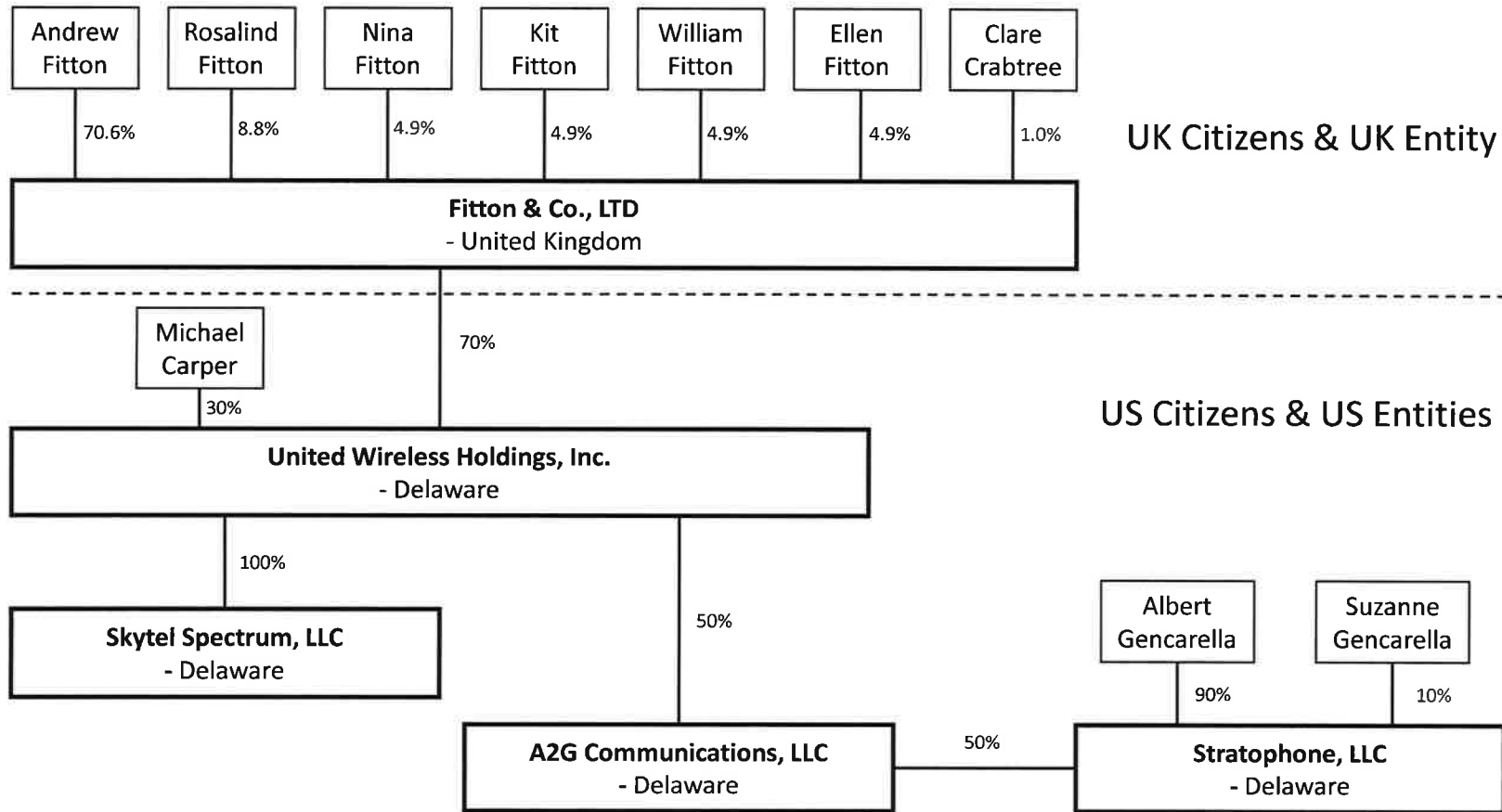
Michael R. Carper  
President and Chief Legal Officer  
United Wireless Holdings, Inc.

Dated: September 20, 2021

## EXHIBIT A

United Wireless Holdings, Inc. (“Holdings”) is a closely held company whose aggregate direct and indirect foreign equity interests were calculated and described in this Petition based on actual equity/voting interests as shown on the ownership chain in Exhibit B below and in accordance with the principles set forth in Section 1.5002 of the FCC rules for purposes of the information provided in Sections II.E,.F, H, and I of this Petition. This Petition is being filed to provide the FCC with the current foreign ownership interests of Holdings, its subsidiary SkyTel Spectrum, LLC (SkyTel”) and of A2G Communications, LLC (“A2G”) and to secure approval of the foreign ownership interest in the Air-Ground Radiotelephone Service (“AGRAS”) licenses held by A2G by virtue of Holdings’ 50% interest in that entity and of the paging and narrowband PCS (“NPCS”) licenses held by SkyTel . The public interest would be served by the grant of this Petition on an expedited basis as the AGRAS and NPCS licenses, immediately upon FCC consent, will be assigned to AURA Network Systems OpCo, LLC (“AURA”), an entity with no disclosable foreign ownership interests that, pursuant to Long-Term *De Facto* Transfer Lease authority granted by the FCC, has deployed a nationwide, modernized nationwide AGRAS network utilizing the A2G spectrum.

## Exhibit B: Ownership Structure



# REDACTED – FOR PUBLIC INSPECTION

## Confidential Attachment

### Supplemental Information for Section 310(b) Petition for Declaratory Ruling Involving Common Carrier Wireless Licenses

**Petitioners: United Wireless Holdings, Inc., SkyTel Spectrum, LLC and A2G Communications, LLC**

#### Section I: Identification of Relevant Parties

- 1) Provide the name, address, principal place of business, and place of incorporation of Relevant Parties. For the purposes of the following questions “Relevant Parties” means the following:
- a) Current or Proposed Common Carrier Wireless or Common Carrier Earth Station Licensee (“Licensee”)
  - b) Controlling U.S. Parent of the Licensee (“Petitioner”)
  - c) Any Individual or Entity with an Ownership Interest in either the Licensee or the Petitioner (“Owner(s)/Controller(s)”).

RESPONSE: a) Licensee entities: SkyTel Spectrum, LLC  
A2G Communications, LLC

b) Controlling U.S. Parent(s): United Wireless Holdings, Inc. and Stratophone, LLC

c) Ownership Interests: SkyTel Spectrum, LLC – 100% by United Wireless Holdings, Inc.  
A2G Communications, LLC – 50% by United Wireless Holdings, Inc.  
50% by Stratophone, LLC  
United Wireless Holdings, Inc. – 70% by Fitton & Co., Ltd. (U.K.)  
30% by Michael R. Carper

#### Section II: Petitioner/Licensee Ownership

- 2) To the extent not otherwise identified in response to Question 1, identify each Individual or Entity that holds an Ownership Interest in the Relevant Parties, specifically listing any foreign Entities or Foreign Government-controlled Entities, including the Ultimate Parent Entity of the Licensee and the Petitioner and any other companies/Individuals holding an Ownership Interest in the chain of ownership.
- a) For each Individual or Entity with Ownership Interest in any of the Relevant Parties (identified in response to either Question 1 or Question 2), include a clear explanation of its involvement in the Relevant Party, including whether the Individual or Entity will have a management role in the Petitioner or Licensee.
  - b) For each Individual or Entity with Ownership Interest in any of the Relevant Parties (identified in response to either Question 1 or Question 2), provide all identifying information, as follows:
    - i) For Individuals, provide name (including all names and aliases used by that person), country of citizenship (indicate whether the Individual is a dual citizen and all countries where citizenship is held), date and place of birth, U.S. alien number (indicate whether the Individual is a U.S. Lawful Permanent Resident) and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses, and all phone numbers. PII may be provided in Attachment G, a PII Supplement to the Standard Questions.

- ii) For Entities, provide country of incorporation (if United States, include state of incorporation), principal place of business, general business type (e.g., holding company, investment firm, etc.), all business addresses, email addresses, and related phone numbers.

**RESPONSE:** 2) *See* Petition at Section I and Exhibits A and B to the Petition. There is no Foreign Government ownership or control in any of the Relevant Parties.

a) The role of Individuals and Entities with Ownership Interests in the Petitioners is as follows -

Andrew Fitton, a U.K. citizen, is the majority owner (through his 70.6% interest in Fitton & Co., Ltd) and Chief Executive Officer of United Wireless Holdings, Inc. and has an active decision-making role in the management of this entity as well as its Licensee affiliates, SkyTel Spectrum, LLC and A2G Communications, LLC (through United Wireless' 50% ownership of that Licensee), though his day-to-day role is limited, and he is not involved with network operations.

Rosalind Fitton, a U.K. citizen, is the spouse of Andrew Fitton and holds a small minority interest (through Fitton & Co., Ltd.) in United Wireless Holdings, Inc. and has no current decision-making role in the management of this entity or its Licensee affiliates, SkyTel Spectrum, LLC and A2G Communications, LLC. or any day-to-day role or involvement with network operations. In the event of Andrew Fitton's death, Rosalind Fitton would become the majority owner of Fitton & Co., Ltd. And assume Andrew Fitton's role with the Petitioner entities.

Fitton & Co., Ltd., is a U.K. limited liability company that holds 70% of United Wireless Holdings, Inc., which in turn owns 100% of Licensee SkyTel Spectrum, LLC and 50% of Licensee A2G Communications, LLC. Fitton & Co., Ltd. Through its majority owner, Andrew Fitton, provides active management of United Wireless Holdings, Inc. but it is not involved with network operations.

Michael Carper, a U.S. citizen, is the minority owner, President and Chief Legal Officer of United Wireless Holdings, Inc. and has an active management role for this entity as well as its Licensee affiliates, SkyTel Spectrum, LLC and A2G Communications, LLC. While he provides day-to-day management of these entities, he is not involved with network operations.

Albert Gencarella, a U.S. citizen, is the 50% owner (through his majority ownership of Stratophone, LLC) of Licensee A2G Communications, LLC and has an active decision-making role in the management of this entity but is not involved with network operations.

Suzanne Gencarella, a U.S. citizen, holds a small minority interest in Licensee A2G through her ownership of a minority interest in Stratophone and has no decision-making role in the management of this entity or any Licensee entity and is not involved with network operations.

United Wireless Holdings, Inc. is a Delaware holding company that holds 100% ownership of Licensee SkyTel Spectrum, LLC and 50% of Licensee A2G Communications LLC. In 2008 United Wireless received approval through a declaratory ruling to have up to 100% foreign ownership by Andrew Fitton and up to 25% other foreign owners without further FCC approval. United Wireless is not currently involved in network operations.

Stratophone, LLC is a Delaware limited liability company that holds 50% ownership of Licensee A2G Communications, LLC. Stratophone is not currently involved with network operations.

b) Name: Andrew Fitton



Country of Citizenship: United Kingdom  
Date and Place of Birth:  
U.S. Social Security Number:  
Passport Identifying Information:  
Residence addresses: 1)

2)

Business Addresses: 1) United Wireless Holdings, Inc.  
P.O. Box 190  
Austin, Texas 78767  
Tel: 240-417-7670

2)

3)

4)

Name: Rosalind Fitton  
Country of Citizenship: United Kingdom  
Date and Place of Birth:  
U.S. Social Security Number:  
Passport Identifying Information:  
Residence addresses: 1)

2)

Name: Fitton & Co., Ltd.  
Country of Incorporation: United Kingdom  
U.K. Company Registration Number: 07055662  
Principal Place of Business: Richmond Upon Thames, United Kingdom  
General Business Type: Holding Company  
Email: [andrew.fitton@acfitton.com](mailto:andrew.fitton@acfitton.com)

Business Address:           Fitton & Co.  
                                  12 Old Palace Lane  
                                  Richmond Upon Thames  
                                  Surrey, TW9 1PG United Kingdom  
                                  Tel: +44 203 056 9621

Name: Michael Carper  
Country of Citizenship: USA  
Date and Place of Birth:  
U.S. Social Security Number:  
Passport Identifying Information:  
Residence addresses: 1)

2)

3)

Business Addresses: 1) United Wireless Holdings, Inc.,  
                                  P.O. Box 190  
                                  Austin, Texas 78767  
                                  Tel: 240-417-7670

2)

Name: United Wireless Holdings, Inc.  
Country and State of Incorporation: USA, Delaware  
Principal Place of Business: Austin, Texas  
General Business Type: Holding company  
Email: mike.carper@unitedwirelessholdings.com  
Business Addresses: 1) United Wireless Holdings, Inc.,  
                                  P.O. Box 190  
                                  Austin, Texas 78767  
                                  Tel: 240-417-7670

Name: Albert Gencarella  
Country of Citizenship: USA  
Date and Place of Birth:  
U.S. Social Security Number:  
Passport Identifying Information:  
Residence addresses: 1)

Business Addresses: 1) Stratophone, LLC  
                                  12788 SW Lake Fern Circle  
                                  Port St. Lucie, Florida 34987  
                                  Tel: 732-778-7505

Name: Suzanne Gencarella  
Country of Citizenship: USA  
Date and Place of Birth:  
U.S. Social Security Number:  
Passport Identifying Information:  
Residence addresses: 1)

Business Addresses: 1) Stratophone, LLC  
12788 SW Lake Fern Circle  
Port St. Lucie, Florida 34987  
Tel: 732-778-7505

Name: Stratophone, LLC  
Country and State of Incorporation: USA, Delaware  
Principal Place of Business: Port St. Lucie, Florida  
General Business Type: Communications services and investment company  
Email: aeg1144@comcast.net  
Business Addresses: 1) Stratophone, LLC  
12788 SW Lake Fern Circle  
Port St. Lucie, Florida 34987  
Tel: 732-778-7505

**Section III: Petitioner/Licensee Details**

- 3) Does any of the Relevant Parties have existing, planned, or prior relationships, partnerships, funding arrangements, or service contracts, directly or indirectly, with any of the following:**
- a) Foreign companies or foreign Entities;**
  - b) Any Foreign Government or any entity owned or controlled by a Foreign Government; or**

- c) An Individual or Entity outside the United States, not a citizen of, or domiciled within, the United States, or not subject to the jurisdiction of the United States, and not having as a principal place of business or presence in the United States.

Yes  No

If yes to any question above, explain each answer in detail.

RESPONSE: Fitton & Co., as a family investment entity, has passive investments in non-U.S. businesses unrelated to the communications industry or the Petitioners. More than ten years ago, Holdings repaid in full all financing obtained from a private foreign source to fund a portion of the transaction through which the Licenses were acquired.

- 4) Identify the total number of current employees of the Licensee and the Petitioner, and planned number of employees for the next 12 months. **RESPONSE:** United Wireless Holdings, Inc. has 2 employees with no changes planned.

- 5) Does the Licensee or Petitioner currently operate or plan to operate a website?

Yes  No

If yes, provide all URL addresses for any current or known future websites and describe whether the information therein is up to date. **RESPONSE:** United Wireless Holdings, Inc. has a webpage at [www.unitedwirelessholdings.com](http://www.unitedwirelessholdings.com), with information relating to the entity's physical location closed during COVID subject to being updated. No other petitioner entity has a website.

- 6) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers or Directors been involved in bankruptcy proceedings, or any other legal proceeding undertaken for the purpose of liquidating, reorganizing, refinancing, or otherwise seeking relief from all or some of their debts in any jurisdiction over the past 5 years?

Yes  No

If yes, provide details.

- 7) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers or Directors ever been involved or associated with a previous application to the FCC?

Yes  No

If yes, provide application identifying information.

RESPONSE: In 2008 United Wireless Holdings, Inc. filed for and was granted FCC approval of up to 100% foreign ownership and control of Licensee SkyTel Spectrum, LLC by Andrew Fitton for provision of paging and NPCS services. See Petition. SkyTel Spectrum, LLC (FRN 0017628322), Stratophone, LLC (FRN 0003507019), and A2G Communications, LLC (FRN 0020377453) have applied for and been granted wireless authorizations by the FCC.

- 8) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers or Directors ever been involved or associated with a previous filing with the Committee on Foreign Investment in the United States (CFIUS)?

Yes  No

If yes, provide filing identifying information.

- 9) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers or Directors ever been blocked, sanctioned, penalized, or had an authorization or other permission revoked by the FCC?

Yes  No

If yes, provide details.

- 10) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers or Directors ever been blocked, sanctioned, penalized, or had an authorization or other permission prohibited, suspended, or revoked by CFIUS?

Yes  No

If yes, provide details.

- 11) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers or Directors ever been convicted of any felony (an offense carrying a maximum potential sentence of a term of

imprisonment of more than a year) in the United States or any other country? This includes any settlements or negotiated resolutions, non-prosecution agreements, or deferred prosecution agreements.

Yes  No

If yes, , provide details, including name(s) of the Individual or Entity involved, dates, offenses, jurisdiction/court, and sentence.

- 12) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers or Directors ever been subject to any criminal, administrative, or civil penalties imposed for violating the regulations of the FCC, U.S. Department of State, U.S. Department of the Treasury (including, but not be limited to, the Internal Revenue Service, Office of Foreign Assets Control, Financial Crimes Enforcement Network (FinCEN), or the Office of the Comptroller of the Currency), U.S. Department of Energy, U.S. Department of Commerce, U.S. Federal Trade Commission, U.S. Securities and Exchange Commission, U.S. Environmental Protection Agency, the World Bank Group, or U.S. Commodity Futures Trading Commission, or for violating the regulations of any comparable state or foreign agency? This includes any settlements or negotiated resolutions, non-prosecution agreements, or deferred prosecution agreements.

Yes  No

If yes, provide details, including name(s) of the Individual or Entity involved, dates, violations, agency, penalty, and if a fine was imposed, status of payment.

- 13) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers or Directors, or any associated foreign Entities ever been on the Specially Designated Nationals And Blocked Persons List (SDN List), the BIS Unverified List or Entity List in 15 CFR part 744, or equivalent list of the United Nations Security Council or European Union?

Yes  No

If yes, provide details.

- 14) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers or Directors ever been investigated, arraigned, arrested, indicted, or convicted of any of the following:

a) Criminal violations of U.S. law, including espionage-related acts or criminal violations of the International Trade in Arms Regulations (ITAR) or the Export Administration Regulations (EAR)?

Yes  No

b) Deceptive sales practices, violations of the Consumer Fraud Act and regulations, and/or other fraud or abuse practices whether pursuant to Federal, state, or local law?

Yes  No

- c) Violations of Federal, state, or local law in connection with the provision of telecommunications services, equipment and/or products, and/or any other practices regulated by the Telecommunications Act of 1996 and/or by state public utility commissions?  
Yes  No

If yes to any of the above, describe in detail, including name(s) of Individuals and entities involved, date(s), and current status or final disposition of matter, including any terms of settlement. Provide any available supporting documentation.

#### **Section IV: Licensee Operations**

- 15) Has the Licensee been operational over the course of the current or previous year?  
Yes  No

If yes, answer the following: The licenses held by SkyTel Spectrum LLC are subject to a management agreement with American Messaging Systems, LLC of Lewisville, Texas (an entity with no disclosable foreign ownership). The licenses held by A2G Communications, LLC are subject to a Long-Term *De Facto* Transfer Lease agreement with AURA Network Systems OpCo, LLC of McLean, Virginia (an entity with no disclosable foreign ownership). The licensees do not have the information relevant to Questions 15 (a)-(e) and 16, below, which is information held by the entities operating these facilities. The revenue received by licensees is fixed by contract and is unrelated to the revenue derived from the provision of service to subscribers.

- a) Provide separately for each year its gross revenue;
- b) Provide separately for each year the Cost of Goods Sold (COGS);
- c) Provide the total amount of COGS allocated for telecommunications equipment and service types; and
- d) Describe the customer base of the Licensee (business, residential, carrier, enterprise, etc.). Is this expected to change, and if so, how?; and
- e) Describe, for all services provided to each category of customer (e.g., enterprise, residential, carrier, etc.):
- i) Total number of subscribers;
  - ii) Total annual gross revenue for preceding fiscal year; and
  - iii) Percentage of total gross revenue per category of customer for preceding fiscal year.
  - iv) Is this expected to change, and if so, how?
- 16) List all expected and actual Federal, state, and local government customers, including pursuant to any classified contracts, and include a description of all services to be provided, or services that are currently being provided, to such customers.
- 17) Name each of the Licensee's and Petitioner's Corporate Officers, Senior Officers, and Directors, and for each provide the following: See responses in Section II above.
- a) Explain the nature and extent of each Corporate Officer's, Senior Officer's or Director's involvement in the Entity's business; and
  - b) Provide all countries of citizenship, date and place of birth, U.S. alien number and/or social security

number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses, and all phone numbers. PII may be provided in Attachment G.



18) Identify the Senior officer or employee (who is a U.S. citizen residing in the United States with an active security clearance or who is eligible to obtain one) who will be the Licensee's authorized law enforcement point of contact responsible for accepting and responding to requests or compulsory processes from U.S. law enforcement or other U.S. government agencies.

RESPONSE: Michael Carper who does not have, but is eligible to obtain, active security clearance.

a) Explain the Individual's relationship to the Licensee and provide name, all countries of citizenship, date and place of birth, U.S. social security number, all passport identifying information (including number and country), all residence addresses, all business addresses, and all phone numbers. Also identify whether the Individual has an active U.S. Government security clearance. PII may be provided in Attachment G. See Section II above.

19) Identify whether, if required by law, regulation, or license condition, the Licensee will report the following to the appropriate law enforcement agencies, immediately upon discovery:

a) Any act of compromise of a lawful interception of communications?

Yes  No

b) Any unauthorized access to customer information and/or call-identifying information?

Yes  No

c) Any artificially inflated or fraudulent call traffic detected on your network?

Yes  No

d) Any felony (an offense carrying a maximum potential sentence of a term of imprisonment of more than a year) conviction, U.S. or foreign, of the Licensee, any company officers/directors, or any Individual/company with 5% or greater direct or indirect ownership interest in the Licensee?

Yes  No

e) Any act of unlawful electronic surveillance that occurred on its premises or via electronic systems under its control?

Yes  No

20) Will the Licensee store and/or maintain any U.S. communications content, transactional data, call-associated data, billing records, or other subscriber information?

Yes  No

If yes, answer the following:

a) Describe the types of records that will be stored;

b) Provide all addresses of locations where such records will be stored and/or remotely accessed/managed via electronic systems;

c) If any storage location differs from the Licensee's address, explain the general purpose of the location and its function within the Licensee's business;

d) If any of the records will be accessible from outside the United States, explain where, how, and who will have access to them; and

e) Describe all physical/electronic security measures utilized for all locations/systems to protect the confidentiality of records.

21) Will any Non-U.S. Individual have access to one or more of the following:

a) Physical facilities and/or equipment under the Licensee's control?

Yes  No

If yes, provide identity of person(s) and explain the type of access that will be provided.

b) Customer records, including Customer Proprietary Network Information (CPNI), billing records, and/or Call Detail Records (CDRs)?

Yes  No

If yes, provide identity of person(s) and explain the type of access and records that will be provided.

c) Network control, monitoring, and/or auditing features?

Yes  No

If yes, explain the type of access that will be provided, and how access will be logged and archived.

d) Electronic interfaces that allow control and/or monitoring of the infrastructure under the Licensee's control, including, but not limited to, access to actual communications content and data?

Yes  No

If yes, provide identity of person(s) and explain the type of access and control that will be provided.

For each Individual identified in response to these questions, provide the following information: name, countries of citizenship, date and place of birth, U.S. alien number and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses, and all phone numbers. PII may be provided in Attachment G, a Supplement to the Standard Questions.

22) What access control/security policies (physical and cyber) are in place, or will be in place prior to commencing operations, for your network? If the policies exist and are available in writing, provide copies of these policies. Information, if any, in possession of entities with no disclosable foreign ownership that are operating the licensed facilities.

23) What encryption products/technologies have been installed on this network, or will be installed prior to commencing operations?. Information, if any, in possession of entities with no disclosable foreign ownership that are operating the licensed facilities.

24) Does/will the Licensee have any screening and/or vetting procedures which will be applied to U.S. or non-U.S. persons who have access, remote or otherwise, to the Licensee's communications network facilities, equipment, or data?

Yes  No

RESPONSE: Information, if any, in possession of entities with no disclosable foreign ownership that are operating the licensed facilities.

If yes, explain all such procedures.

25) Identify whether, if required by law, regulation, or a license condition, the Licensee will inform the National Security Division (NSD) of the U.S. Department of Justice if, in the future, any record storage/access location is transferred and/or newly established outside of the United States.

RESPONSE: Information, if any, in possession of entities with no disclosable foreign ownership that are operating the licensed facilities

**26)** Explain how the Licensee, in accordance with U.S. law, regulation, or a license condition, would make any and all records not stored in the United States electronically available in the United States within

five (5) business days pursuant to a lawful request to the authorized law enforcement point of contact identified above if such a point of contact is maintained or intended to be maintained.

RESPONSE: Information, if any, in possession of entities with no disclosable foreign ownership that are operating the licensed facilities

27) Describe all lawful intercept capabilities of the Licensee. Will they be changing, if so, how?

28) What, if any, outside capabilities via remote access will exist within the Licensee to control or monitor operations over the network (e.g., audit mechanisms, record access monitoring)? Will they be changing, if so, how?

RESPONSE: Information, if any, in possession of entities with no disclosable foreign ownership that are operating the licensed facilities

29) Do/will any third-party Individual or Entity have Remote Access to the Applicant's network, systems, or records to provide Managed Services?

Yes  No

If yes, provide a detailed explanation.

RESPONSE: American Messaging Systems, LLC (no reportable foreign ownership) and AURA Network Systems OpCo, LLC (no reportable foreign ownership) will have access to records generated by their systems in connection with operation of networks incorporating the Licenses.

30) Do/will any third parties have access, post-transaction, to the Licensee's network, systems, or records for any other reason (e.g., sharing subscriber data for marketing purposes)?

Yes  No

If yes, provide a detailed explanation.

#### **Section V: Licensee Services**

RESPONSES: The Licenses held by SkyTel Spectrum LLC authorize FCC Part 22 paging services at specific sites located across the U.S. and Part 22 narrowband PCS services nationwide operating at multiple sites and subject to a management agreement with American Messaging Systems, LLC of Lewisville, Texas (an entity with no disclosable foreign ownership). The licenses held by A2G Communications, LLC authorize FCC Part 22 air-ground-radio-service at specific sites located across the U.S. and are subject to a Long-Term *De Facto* Transfer Lease agreement with AURA Network Systems OpCo, LLC of McLean, Virginia (an entity with no disclosable foreign ownership.) It is not the intent of any of the Petitioners to directly operate the licenses held by the Licensee entities or to direct any change to the types of services provided or current operations associated with the licenses as agreements have been signed to transfer the licenses to AURA Network Services, LLC, subject to FCC approval (*see* Petition). As such Petitioners are requesting expedited treatment of this Petition to facilitate FCC approval of the transfer of the licenses to full U.S.-owned entity ownership and control as soon as possible

31) List the types of common carrier wireless licenses (e.g. cellular, microwave) and/or common carrier earth station licenses held (or applied for) by the Relevant Parties including the geographic area of

service for each type of license.

**32)** Provide a general summary of the nature of the Licensee's current and planned services and operations, to include an explanation of the Licensee's intended overall business model and its relationship with any sister and/or partner companies. Will they be changing, if so, how?

**33)** Why is the Petitioner seeking foreign investment/ownership?

**34)** Provide all addresses of the present and anticipated physical locations for all of the Licensee's network equipment, data centers, and infrastructure (e.g. towers, earth stations). Will they be changing, if so, how? Advise whether these locations are owned or leased – if leased, provide details of the owner(s) and a list of goods/services the owner(s) provides – and the make and model of the principal equipment used, including, but not be limited to, the portions of the network covered below:

**a)** Describe the carrier transport facilities (e.g., T1, DS3, Optical Carrier) that will enable customer data flow into and out of owned and/or leased equipment.

**b)** Will the Licensee be operating any physical and/or virtual telecommunications switching platforms (e.g., TDM and/or VoIP switches)?

Yes  No

If yes, provide a network architecture diagram that shows all switches and connection points.

**c)** Provide a description of any other intended network equipment and/or proposed infrastructure (e.g., routers, media gateways, multiplexing/cross-connect facilities, signaling devices, data centers, other equipment).

- d) Does the Licensee have a network topology map that shows its Points of Presence (POPs), Network Operation Centers (NOC), towers, and other network elements?  
Yes  No

If yes, attach to your response.

- e) Is the Licensee or its affiliates able to control operations at any POP and/or Network Operations Center (NOC) from any overseas locations?  
Yes  No

If yes, what is the nature of the foreign-based control? Where is it? Who has it? How? Will it be changing, if so, how?

- 35) Will the Licensee use interconnecting carriers and/or peering relationships?  
Yes  No

If yes, provide details and list the carriers.

- 36) Will the Licensee rely on underlying carrier(s) to furnish services to its customers and/or resell any services?  
Yes  No

If yes, provide details and list whose services and what services will be resold.

- 37) In what manner will services be delivered to customers?

RESPONSE: See Petition and responses to Section IV above.

- 38) Does/will the Licensee serve any sectors of U.S. critical infrastructure?  
Yes  No

Unknown: See responses to Section IV above.

If yes, check all that apply:

- |   |   |
|---|---|
| a. <input type="checkbox"/> Defense Industrial Base   | i. <input type="checkbox"/> Information Technology      |
| b. <input type="checkbox"/> U.S. Intelligence Community   | j. <input type="checkbox"/> Chemical                    |
| c. <input type="checkbox"/> Emergency Services<br>(i.e., Federal, state, local law enforcement, fire, police) | k. <input type="checkbox"/> Commercial Facilities       |
| d. <input type="checkbox"/> Government Facilities<br>(i.e., Federal, state, local entities)                   | l. <input type="checkbox"/> Agriculture and Food Supply |
| e. <input type="checkbox"/> Banking and Finance   | m. <input type="checkbox"/> Health Care                 |
| f. <input type="checkbox"/> Nuclear Reactors, Materials, or Waste   | n. <input type="checkbox"/> National Monuments          |
| g. <input type="checkbox"/> Drinking Water and Water Supply   | o. <input type="checkbox"/> Transportation              |
| h. <input type="checkbox"/> Energy  | p. <input type="checkbox"/> Postal Shipping             |
|   | q. <input type="checkbox"/> Dams                        |
|   | r. <input type="checkbox"/> Other (explain in detail)   |

Will this be changing, if so, how?

RESPONSE: See narrative response to Section IV questions above.

**Section VI: Licensee Services Portfolio Checklist and Reference Questions**

**Instructions:** Check all applicable boxes that reflect the types of telecommunication services the Licensee intends to provide in the United States only. Do not select any services that will be provided outside the United States.

For each checked box: (1) provide a **separate and full explanation** at the end of this questionnaire and (2) answer the Reference Questions below the table regarding the services you have indicated in the checklist.

<b>PROPOSED LICENSEE SERVICES</b>	
VoIP (Voice over Internet Protocol)	<input type="checkbox"/>
POTS (Plain Old Telephone Service)	<input type="checkbox"/>
TDM (Time Division Multiplexing)	<input type="checkbox"/>
Voicemail	<input type="checkbox"/>
PBX (Private Branch Exchange)	<input type="checkbox"/>
Centrex (Hosted/Managed PBX)	<input type="checkbox"/>
Callback Service	<input type="checkbox"/>
Calling Card	<input type="checkbox"/>
Dial Tone Service	<input type="checkbox"/>
Issue DID (Direct Inward Dial) Local Telephone Numbers	<input type="checkbox"/>
Local Exchange Service	<input type="checkbox"/>
Local Toll Service	<input type="checkbox"/>
Domestic/International Long Distance (Interexchange Service)	<input type="checkbox"/>
Tollfree Service	<input type="checkbox"/>
IVR (Interactive Voice Response)	<input type="checkbox"/>
Conference Calling	<input type="checkbox"/>
Operator Service	<input type="checkbox"/>
Directory Assistance	<input type="checkbox"/>
Dial Around Service (1010XXX Casual Calling)	<input type="checkbox"/>
Switched Access	<input type="checkbox"/>
Special Access (Dedicated Line)	<input type="checkbox"/>
Mobile Top Up/Reload Services	<input type="checkbox"/>
Mobile Network Operator Services (MNO)	<input type="checkbox"/>
Mobile Virtual Network Operator Services (MVNO)	<input type="checkbox"/>
Automatic Call Distribution (ACD)	<input type="checkbox"/>
Other	<input type="checkbox"/>
	<input type="checkbox"/>
Data/Private Line	<input type="checkbox"/>
ISP (Internet Service Provider)	<input type="checkbox"/>
VPN (Virtual Private Network)	<input type="checkbox"/>
Web Hosting	<input type="checkbox"/>
LAN (Local Area Network)	<input type="checkbox"/>
WAN (Wide Area Network)	<input type="checkbox"/>
ISDN (Integrated Services Digital Network) BRI (Basic Rate Interface)	<input type="checkbox"/>
ISDN PRI (Primary Rate Interface)	<input type="checkbox"/>
DSL (Digital Subscriber Line)	<input type="checkbox"/>
Frame Relay	<input type="checkbox"/>
Email	<input type="checkbox"/>

International Voice/Data Service	<input type="checkbox"/>
Wireless/Mobile Voice/Data Services	<input checked="" type="checkbox"/>
Satellite Services	<input type="checkbox"/>
RF (Radio Frequency), Microwave	<input type="checkbox"/>
Video	<input type="checkbox"/>
Cloud Services	<input type="checkbox"/>
Other	<input type="checkbox"/>
Routing, Signaling Services	<input type="checkbox"/>
Transport Facilities	<input type="checkbox"/>
Leased Lines	<input type="checkbox"/>
Collocation Services	<input type="checkbox"/>
Other	<input type="checkbox"/>

**Reference Questions:**

***Instructions: Answer each question below as it relates to each of the services selected in the above table.***

- a) In what manner will the service(s) be delivered to your customers?
- b) What kind of network infrastructure will be utilized to deliver the service(s)?
- c) What equipment (manufacturer, make, and model) and software version will be utilized to provide the service(s)? Will the software be regularly updated?
- d) Will the service(s) be facilities based, resold, or both? Provide description.
- e) Are you planning to implement and deploy 5G? If so, describe the plans, approach, anticipated services, and the intended vendors.

RESPONSE: The Licensees, SkyTel Spectrum, LLC and A2G Communications, LLC do not intend to change any of the operations or services conducted by the U.S. owned and controlled entities that currently manage and control the Licenses. These operations are related to the offering of paging-related and AGRAS services to members of the general public. As disclosed in the Petition, the Petitioners are seeking FCC approval to transfer Licenses to AURA Network Services OpCo in connection with the filing of this Petition on an expedited basis.

**WARNING**

If the Petitioner or Licensee knowingly and willfully (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry, the Petitioner or Licensee may be subject to prosecution under Title 18, United States Code, Section 1001. The FCC may also terminate, revoke, or render null and void any license or authorization granted in this matter if any responses provided are false or intentionally misleading.



**Licensee Certification**

Pursuant to Title 28, United States Code, Section 1746, I, an authorized representative of the Licensees, SkyTel Spectrum, LLC and A2G Communications, LLC, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 20<sup>th</sup> day of Sept., year of 2021.

Representative Name: Michael Carper

Representative Title: United Wireless Holdings  
for Managing Member, SkyTel and V.P., A2G

Representative Signature: 

**Petitioner Certification**

Pursuant to Title 28, United States Code, Section 1746, I, an authorized representative of the Petitioners, United Wireless Holdings, Inc., SkyTel Spectrum, LLC and A2G Communications, LLC, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 20<sup>th</sup> day of September, year of 2021.

Representative Name: Andrew Fitton

Representative Title: CEO

Representative Signature: 