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ITC-STA-20151022-00243 IB2015002003

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October 22, , 2015

By Electronic Filing

Secretary Ms. Marlene Dortch

Federal Communications Commission

445 Twelfth Street, SW Washington, D.C. 20554

International Bureau DCT 30 2015 policy Division

authorized by Crucional Bureau 130/15 Granted Policy Division

Expires: December 29, 2015

OnStar, LLC and General Motors Company Request for International Section 214 Special Temporary Authority

Dear Ms. Dortch:

GM's board of directors. occurred because the UST no longer has the power to designate more than half of the members of shareholder interests) to GM's current board of directors that is now elected by a diverse shareholder base. See Exhibit A attached hereto. As explained below, a transfer of control has directors that was previously controlled by the United States Treasury ("UST") (due to its majority control of the International and Domestic Section 214 authority held by OnStar, from GM's board of to continue operating while the FCC reviews the Parties' application seeking consent to a transfer of respectfully request such Special Temporary Authority ("STA") as may be necessary to allow OnStar Sections 63.04, 63.24, and 63.25 of the Federal Communications Commission's ("FCC") rules "Parties"), through their attorney and pursuant to Section 214 of the Communications Act and OnStar, LLC ("OnStar" or "Licensee") and General Motors Company ("GM") (collectively, the

authority.2 services, the FCC has granted OnStar an International Section 214 authorization with global resale the United States and to various international points, including Canada. With respect to international and Domestic Section 214 authority to deliver vehicle-based telecommunications service throughout reselling capacity on the networks of Verizon Wireless and other carriers. It has both International OnStar is a non-facilities based common carrier that provides telecommunications services by

its productive assets, including International Section 214 Authority, IBFS File No. ITC-214ultimate parent company, General Motors Corporation, Debtor-In-Possession ("GM-DIP"), to transfer On July 16, 2009, the FCC granted consent to the transaction that permitted the Licensee's then 20070823-00346, to GM, whose board of directors was controlled by the UST.³ GM-DIP exited

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See IBFS File No. ITC-T/C-20150929-00230

IBFS File No. ITC-214-20070823-00346

³ See, i.e., IBFS File No. ITC-T/C-20090622-00295.

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