October 4, 2023

VIA ULS

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: ULS File Nos. 0010168412, 0010168439

Dear Ms. Dortch:

Pursuant to Section 1.1208 of the Commission's Rules,[1] DISH Network Corporation ("DISH")[2] files this letter responding to T-Mobile USA, Inc.'s ("T-Mobile") letter of June 26, 2023 ("T-Mobile's Response")[3] and the *ex parte* notice filed by LB License Co., LLC and Channel 51 License Co., LLC (together, "Columbia Capital") on June 26, 2023 ("Columbia Capital's Response").[4]

T-Mobile and Columbia Capital attempt to cast this spectrum purchase as a minor event in select markets that the Commission should rubber stamp without scrutiny. But this transaction threatens wireless competition and implicates material questions for FCC public policy. In deciding how to proceed, the Commission must consider whether the 600 MHz band will be a functional and usable resource for carriers of all sizes, not just for T-Mobile. The Commission should suspend review of this transaction, or at least condition the transaction, to offset the harms to competition and consumers. This course of action is even more necessary today than it was a few months ago in light of two developments—the risk of T-Mobile occupying an even greater portion (as much as 71%) of the 600 MHz frequencies than previously sought, and the Commission's recent recognition of a need to revisit its spectrum screen policies.

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[1] 47 CFR § 1.1208.

[2] *See* Petition to Condition, DISH Network Corporation, ULS File Nos. 0010168412, 0010168439 (filed May 4, 2023) and Reply of DISH Network Corporation, ULS File Nos. 0010168412, 0010168439 (filed June 6, 2023).

[3] Notice of Oral Non-Ex Parte Presentation and Response to DISH Reply, T-Mobile License LLC, Nextel West Corp., LB License Co., LLC, and Channel 51 License Co., LLC, Applications for the Assignment of 600 MHz Authorizations, ULS File Nos. 0010168412, 0010168439 (June 26, 2023).

[4] Ex Parte Notification, Application of Channel 51 License Co. LLC, Nextel West Corp., and T-Mobile License LLC to Assign Spectrum Licenses, ULS File No. 0168412, and Application of LB License Co. LLC, Nextel West Corp., and T-Mobile License LLC to Assign Spectrum Licenses, ULS File No. 0010168439 (June 26, 2023).

First, Comcast and T-Mobile have announced their intention to provide *even more* 600 MHz spectrum to T-Mobile through a progression of leases and future sales.[5] T-Mobile has publicly admitted that it has no immediate need for even more 600 MHz spectrum, but that it "didn't want to pass up an opportunity to add its portfolio" because 600 MHz is a "great spectrum band" that is able to penetrate buildings.[6] The Columbia Capital and Comcast transactions, put together, would potentially give T-Mobile ***five*** blocks of 600 MHz spectrum in several large markets. This after T-Mobile has repeatedly argued that no one carrier should have more than three blocks in the band. Yet T-Mobile's hubris in attempting yet another massive 600 MHz purchase is understandable. Until recently, the Commission's intent to enforce its *Mobile Spectrum Holdings* policy was unclear. However, with the second development described next, good public policy demands that both of T-Mobile's outstanding 600 MHz acquisitions be held in abeyance while rules of general applicability are decided.

Second, T-Mobile's disregard for the spectrum screen has been concerning to begin with, given that the Commission has recognized the screen as an "effective analytical tool in helping identify individual markets where a proposed transaction may raise particular competitive concerns."[7] But this concern is all the more grave now that the Commission has signaled an invigorated interest in its mobile spectrum holdings policies by now seeking comment on AT&T's 2021 petition for rulemaking to create a new enhanced factor review for mid-band spectrum transactions.[8] And it does not stop there – the Commission invites a top-to-bottom review of its entire approach to competition in spectrum policy: "We seek comment on amendments to the Commission's rules or policies that might promote competition in the wireless marketplace to ensure that there is sufficient spectrum available for multiple existing mobile service providers as well as potential entrants."[9] DISH welcomes this timely review, which will help carriers of all sizes have a fair chance to compete in the wireless marketplace.

The Commission's Overall and Low-Band Spectrum Screens Are Both Relevant to This Transaction. That should not even need saying, except that both T-Mobile and Columbia Capital oddly assert that the Commission's spectrum screen and related public interest standard are irrelevant to this spectrum sale.[10] To be sure, T-Mobile fails to rebut DISH's argument that it

[5] *See* T-Mobile USA Inc., Form 8-K, Sept. 12, 2023 (announcing that subsidiary T-Mobile USA, Inc. entered into a License Purchase Agreement with Comcast under which T-Mobile will acquire spectrum in the 600 MHz band from Comcast).

[6] Howard Buskirk, T-Mobile Can Start Deploying Now on Spectrum From Comcast, CFO Says, *Communications Daily,* Sept. 14, 2023.

[7] *See Policies Regarding Mobile Spectrum Holdings Expanding the Economic Innovation Opportunities of Spectrum Through Incentive Auctions*, WT Docket No. 12-269, Report and Order, 29 FCC Rcd 6133, 6143-44, ¶ 246 (2014) (*Mobile Spectrum Holdings Report and Order*).

[8] Public Notice, *Wireless Telecommunications Bureau and Office of Economics and Analytics Seek Comment on AT&T Petition for Rulemaking and Mobile Spectrum Holdings Policies*, WT Docket No. 23-319, RM-11966 (Sept. 22, 2023) ("2023 Mobile Spectrum Holdings PN").

[9] *Id.*

[10] *See* T-Mobile's Response at 1-2 ("The entirety of DISH's argument is that T-Mobile exceeds the spectrum screen in various markets across the country, a DISH argument the Bureau previously dismissed as lacking 'specific allegations of fact sufficient to show that grant of these applications would be prima

exceeds the spectrum screen in certain markets. The desire to portray as irrelevant a test that cannot be met is understandable. But this is *exactly* the sort of transaction where the Commission must use its authority to scrutinize dominant incumbents that seek to amass scarce mobile spectrum. As the Commission recently reaffirmed, its spectrum aggregation policies "reflect the need to ensure 'that sufficient spectrum is available for multiple existing mobile service providers as well as potential entrants.'"[11] The Commission cannot answer this question without asking about spectrum availability for present and future competitors. The Commission must ask not only whether the Columbia Capital sale serves the public interest, but also how the pending Comcast deal will increase T-Mobile's dominant spectrum position nationwide. There appear to be ten PEAs where Columbia Capital and Comcast both hold 600 MHz licenses. If the Commission allows both transactions to proceed without change, T-Mobile would have ***five*** blocks of 600 MHz spectrum (or over 71% of the band) in ***seven*** of these 10 PEAs.[12]

T-Mobile also argues that DISH's filings should be dismissed for lacking a geographic nexus to the contemplated transaction and for lacking factual allegations to support the requested relief.[13] These arguments hold no merit, and T-Mobile's reliance on *AT&T Mobility Spectrum LLL and Aloha Partners* is unavailing.[14] DISH's filings present facts demonstrating that this transaction would harm the public and competition across the country, including in areas with a geographic nexus to the spectrum at issue. The specific competitive harms missing from Aloha *Partners* are acutely present here; and in *Aloha*, unlike here, the proceeding whose pendency justified waiting had already produced a Commission report.

In a half-pivot, T-Mobile and Columbia Capital argue that, if any screen does matter, it is the low-band spectrum screen alone. But the Commission's review begins by determining if the transaction triggers the "initial spectrum screen" by crossing the "approximately one-third threshold" of available spectrum.[15] The Commission reviews "those markets in which an entity would exceed the initial spectrum screen if the transaction as proposed were approved."[16] The Commission's "consideration of potential competitive harms resulting from a proposed spectrum

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facie inconsistent with the public interest.' Not only has the Bureau previously determined that this argument 'fail[s] under section 309(d) to present any substantial and material issue of fact,' a generic argument about national spectrum aggregation lacks any geographic nexus to the transaction before the Bureau and is thus beyond the scope of the Bureau's review.") (internal citations omitted); *see also* Columbia Capital's Response at 3 ("Instead of responding to the points raised by T-Mobile and Applicants in opposition, DISH's reply filing wastes the Commission's time by repeating at length its assertion that T-Mobile has more low-band spectrum than its competitors—even though the license assignment under review would not cause T-Mobile to exceed the spectrum screen in any market.") (internal citations omitted).

[11] 2023 Mobile Spectrum Holdings PN at 1, quoting *Mobile Spectrum Holdings Report and Order* ¶ 17.

[12] *See* Exhibit 1, attached.

[13] T-Mobile June 26, 2023 Letter at 2 n.8.

[14] *See id.,* citing *Application of AT&T Mobility Spectrum LLC And Aloha Partners II, L.P. For Consent to Assign Advanced Wireless Services A, B and C Block Licenses*, 29 FCC Rcd 8599 (July 22, 2014).

[15] *See Mobile Spectrum Holdings Report and Order* ¶ 246.

[16] *Id*. ¶ 256.

acquisition in the secondary market should not be limited solely to markets identified by the initial screen, if [Commission staff] encounter other factors that may bear on [their] public interest inquiry."[17] For example, "[i]ncreased spectrum aggregation in many local markets across the country may imply that harms that occur at the local level collectively could have nationwide competitive effects."[18] The Commission has found it "in the public interest to continue to define local geographic markets but also to analyze potential national effects as appropriate."[19] We urge the same here.

DISH's Arguments Align with FCC Precedent and Policy. T-Mobile and Columbia Capital each assert that DISH's arguments conflict with FCC precedent and policy, and Columbia Capital specifically characterizes DISH's arguments as seeking a spectrum cap or band-specific limit. As an initial matter, the present state of the Commission's spectrum aggregation policies is in flux, given the recent Mobile Spectrum Holdings Public Notice.[20] It would make no sense for the Commission to rubber stamp either the Columbia Capital or the Comcast spectrum transactions during this period of deliberation. And given the Commission's interest in "promot[ing] competition in a 5G environment," DISH's arguments are timely and in closer alignment with FCC policy than any of the positions that T-Mobile and its spectrum sellers are taking.

Even assuming for the sake of argument that DISH were seeking a band-specific cap, the Bureaus have found that "aggregation of spectrum within a specific band may by itself raise competitive issues."[21] Indeed, as DISH explained in its Reply, the proposed transactions pose unique harms unrelated to the *amount* of spectrum T-Mobile would hold in the 600 MHz band. Moreover, because of the way that T-Mobile's 600 MHz spectrum holdings sit in the center of the band, other carriers are left with sub-optimal, non-contiguous 600 MHz licenses that are much more difficult to combine, as discussed in DISH's previous submissions.[22]

Similarly, Columbia Capital asserts that paragraph 186 of the *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, Report and Order and Further Notice of Proposed Rulemaking* (the "Order") means that the FCC rejects band-specific limitations among

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[17] *Id.*

[18] *Id.* ¶ 263.

[19] *Id.*

[20] *See* 2023 Mobile Spectrum Holdings Public Notice.

[21] *Mobile Spectrum Holdings Report and Order* ¶ 282.

[22] T-Mobile's and Columbia Capital's arguments that DISH could have addressed its concerns by handling itself differently during the 600 MHz auction are also without support. T-Mobile's argument that DISH could have acquired more 600 MHz spectrum at the auction has no bearing on whether T-Mobile acquiring the spectrum at issue here (in markets where it already exceeds the spectrum screen) would thwart the Commission's goals of vibrant competition and the downward price pressure that competition delivers for the public. Nor do Columbia Capital's arguments about DISH's conduct at the 600 MHz auction impact whether *this* transaction merits the FCC's case-by-case review, or would withstand that scrutiny.

technically similar bands.[23] But the Order actually supports DISH. The FCC rejected band-specific limits for only those specific high-frequency bands addressed in the Order. The Commission listed three reasons for its rejection, only one of which was the bands' similar technical characteristics. The other two reasons emphasize the need for DISH's requested relief. *First*, there was a vast amount of high-band spectrum available, whereas low-band spectrum was, as it remains, at a premium. *Second*, the FCC rejected those band-specific limits because "all the particular facts of any proposed secondary market transaction will be carefully evaluated on a case-by-case basis to ensure that the public interest is served."[24] DISH's request for a careful, case-specific evaluation of this low-band transaction is consistent with the Commission's reasoning in the Order.

And, even spectrum screen considerations aside, the question would still be unavoidable: Should a single company be allowed to cement its control over important low-band spectrum in markets where it holds an excessive and dominant amount of spectrum that is subject to the screen? As explained above and in our previous filings, this specific transaction has anticompetitive effects, which can only be alleviated by the imposition of DISH's proposed conditions.

Nor do T-Mobile's and Columbia Capital's 800 MHz arguments carry any weight.[25] Both suggest that T-Mobile's selling of 800 MHz spectrum to DISH would cure the issues DISH is raising in an entirely different band. This position is ironic, given that T-Mobile has objected to DISH's request for a modest modification of the timeline to give DISH a meaningful chance at purchasing that spectrum.[26] Further, as DISH explained in its Reply, even if T-Mobile were to divest 13.8 MHz of 800 MHz spectrum, T-Mobile would ***still*** hold 41 MHz of low-band spectrum in a way that separates frequencies held by competitors and forecloses competitors from carrier aggregation.[27] And, that figure does not take into account the additional low-band spectrum concentration that would result from this transaction or the recently announced Comcast deal.

Lastly, Columbia Capital argues that it would be "bad public policy" to move T-Mobile's 600 MHz licenses to one end of the band because it "would require the Commission to determine which licensees . . . to favor with preferred placement."[28] As an initial matter, the Commission has acted to rationalize spectrum holdings in the past. More importantly, DISH has proposed that T-Mobile offer voluntary swaps to other 600 MHz license holders to help offset the harms

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[23] 31 FCC Rcd 8014, 8082 ¶ 186 (2016).

[24] *Id.*

[25] T-Mobile Response at 3 (arguing that T-Mobile would have less low-band spectrum if DISH bought its 800 MHz licenses); *see also* Columbia Capital Response at 4 (suggesting that DISH "already exercises control over a ready-made mechanism to mitigate its professed spectrum aggregation concerns on a nationwide basis" by purchasing the spectrum from T-Mobile.)

[26] *See, e.g.,* Opposition of T-Mobile, *United States v. Deutsche Telekom AG, et al.*, Case No. 1:19-cv-02232, ECF No. 105 (D.D.C. Aug. 25, 2023).

[27] DISH Reply at 4.

[28] Columbia Capital's Response at 5.

from T-Mobile's increased 600 MHz presence. And, T-Mobile would not be forced to do this, but would accept the obligation to swap as a condition for FCC approval of this transaction, which will otherwise have demonstrably negative effects on competition.

The Bureaus Did Not Previously Dismiss DISH's Argument. T-Mobile argues that the Bureaus previously dismissed DISH's argument that T-Mobile exceeds the spectrum screen.[29] But, far from swatting the spectrum screen question away, the Bureaus dwelled extensively on the spectrum screen-busting levels of T-Mobile's spectrum aggregation, and concluded that vigilance was needed. To begin with, the Bureaus took T-Mobile's spectrum screen exceedance seriously:

- "T-Mobile does not disagree that it has exceeded the spectrum screen,"
- "T-Mobile would hold 350 megahertz or more of spectrum in at least one county in 209 CMAs,"
- Across those 209 CMAs, T-Mobile "would hold a maximum of 426 megahertz of spectrum," and
- The local markets "identified for further competitive review [because they exceed the spectrum screen] cover approximately 68% of the U.S. population."[30]

T-Mobile similarly ignores the conclusions that the Bureaus drew from these observations:

- "[T]the amount of spectrum needed for multiple competitors to deploy robust 5G networks may evolve," requiring the Bureaus to "continue to monitor these market dynamics,"[31]
- It is necessary "to prevent the undue concentration of spectrum and to promote the dissemination of licenses among a wide variety of applicants," and
- "[T]he Commission should act to help ensure that new entrants and small and regional providers have access to sufficient spectrum in order to offer competing services that would lower consumer costs."[32]

Consistent with the Bureaus' recognition of the need for heightened scrutiny, DISH is asking the Commission now to review this specific transaction for anticompetitive harm and to impose conditions on T-Mobile's potential acquisition of additional 600 MHz spectrum.

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[29] Response of T-Mobile at 6, *citing T-Mobile License LLC, Cellco Partnership, Applications for 3.7-3.98 GHz Band Licenses*, Auction No. 107, DA 21-891 at 11 ¶ 22 (WTB & OEA rel. July 23, 2021) ("Bureaus' Order").

[30] *See* Bureaus' Order ¶¶ 24-25.

[31] *See id*. ¶ 34.

[32] *See id*. ¶ 29.

DISH's Arguments Are Ripe and Actionable. T-Mobile overlooks the serious balkanization of the 600 MHz frequencies that this transaction would exacerbate, dismissing as "incredibly speculative" DISH's point that swaps may be necessary to cure it. T-Mobile also calls the proposed conditions "unprecedented, unjustified, and irrational."[33] But spectrum balkanization has repeatedly been recognized by the Commission as a serious inefficiency, including in the Sprint/Nextel spectrum relocation auction and in the 700 MHz spectrum rationalization settlement forged by Acting Chairwoman Clyburn. DISH has justified its concerns, which may and must be raised before T-Mobile forecloses rivals from essential low-band spectrum in the markets it already dominates. For its part, Columbia Capital argues that carriers' existing ability to swap spectrum blocks renders DISH's arguments hypothetical and unripe, since DISH has not made any assignment or transfer applications or approached other licensees about 600 MHz swaps.[34] But it takes more than one to tango. DISH's willingness is not at issue here—it is T-Mobile's. As stated above, both the Columbia Capital and Comcast transactions should be placed on hold while the Commission updates its spectrum aggregation policies. But if the Commission were to allow the Columbia Capital transactions to proceed, the proposed DISH conditions would offer a necessary safeguard to help smaller carriers be able to aggregate low-band spectrum and efficiently deploy their 5G networks.

There is a Substantive Difference Between T-Mobile Temporarily Leasing and Permanently Owning the Spectrum Rights At Issue. T-Mobile argues that there would be no anticompetitive effects of its making permanent its temporary use (by lease) of the spectrum in question. But T-Mobile's argument ignores the difference between benefitting from an asset temporarily and owning the asset almost perpetually, with minimal license non-renewal risk. If there were no difference, the Commission would not distinguish between leases and licenses as it does. This transaction's anticompetitive effects stem from T-Mobile making its dominant position in the markets permanent, which could reduce access to needed spectrum by competitors and prevent their carrier aggregation via T-Mobile's position in the center of the band. The Commission also must consider that T-Mobile is trying the "rent-to-own" approach again with the newly announced Comcast deal. As it reviews its spectrum aggregation policies, the Commission can examine whether arrangements like these may be circumventing Commission rules or obfuscating potential harms from spectrum deals.

DISH's Arguments Are Timely and Comply with the FCC's Procedural Rules. T-Mobile and Columbia Capital also try to argue that DISH's arguments in favor of its Petition are untimely.[35] But DISH has not filed a petition to deny the proposed transaction, as recognized by T-Mobile itself.[36] Instead, DISH has argued that the spectrum screen ought to trigger close scrutiny of these transactions, and that certain reasonable conditions are needed to protect competition and the public interest. It remains up to the Commission to decide whether to continue to use the spectrum screen to evaluate whether proposed transactions harm the public

[33] T-Mobile Response at 3.

[34] Columbia Capital Response at 6.

[35] T-Mobile Response at 1; Columbia Capital Response at 2-3.

[36] *Id.* at 3 ("While styled a 'Petition to Condition,' DISH's comments do not satisfy the basic requirements for—and should not be considered—a Petition to Deny.").

interest.[37]

T-Mobile and Columbia Capital also argue, wrongly, that DISH's filings should be rejected for procedural reasons. First, T-Mobile and Columbia Capital each argue that DISH's Petition is not supported by an affidavit (citing Section 1.939(d)). The Commission's rules, 47 CFR 1.939(d), require an affidavit supporting certain factual allegations in a *petition to deny*, "except for those of which official notice may be taken." The Commission may take official notice of the facts necessary to consider DISH's petition to condition. Indeed, the fact that the spectrum screen has been tripped in the markets at issue in this transaction means that the Commission must conduct a competitive review under its policies. T-Mobile also argues that DISH's filing was not properly served upon all parties to the proceeding.[38] But DISH has not failed to serve any genuine party in interest, and T-Mobile has not specified which party DISH allegedly has not served, and identifies no party in interest as having been harmed. The Commission can consider DISH's comments as part of its normal-course spectrum screen review regardless of this purported defect.

Columbia Capital separately argues that a "petition to condition" cannot be found in the FCC's rules, making DISH's filing so procedurally improper that for the FCC to consider its merits "would harm the public interest."[39] Columbia Capital states that the FCC would violate the Administrative Procedure Act ("APA") were the FCC to act on a filing "that fails to follow established agency procedures."[40] Instead, Columbia Capital asserts, the FCC should dismiss DISH's filings before reaching their merits and bar DISH from the proceeding.

Columbia Capital bases its APA arguments on *Suncor Energy (U.S.A.), Inc. v. U.S. EPA*,[41] which Columbia Capital says held that reversal and remand is warranted when an agency ignores its own regulation. But the EPA's decision in that case is distinguishable in that the EPA ignored its own regulatory definition of the word "facility."[42] Here, by contrast, the FCC's rules are silent on whether a rival can support a grant of a transaction with conditions. Acting on a petition to condition would therefore bear little resemblance to the EPA's error in *Suncor*.

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[37] At the least, DISH's filings should be considered as informal requests for Commission action under 47 C.F.R. § 1.41, a provision which specifically contemplates such filings for wireless proceedings. Indeed, the Commission has recently reiterated its support of "allowing informal objections" because of "the benefit of robust debate and input as part of the record." *Expediting Initial Processing of Satellite and Earth Station Applications,* IB Docket No. 22-411 ¶ 85 (Sept. 22, 2023). *See also* Northstar Wireless, Applications for New Licenses, File Nos. 0006670613, 0008243409, Opinion and Order On Remand (Nov. 23, 2020) (noting that the Commission "has broad discretion to consider the views of such interested parties as informal objections under section 1.41 of the Commission's rules.").

[38] T-Mobile Response at 1-2 n.5.

[39] Columbia Capital Response at 2.

[40] *Id.*

[41] 50 F.4th 1339, 1352-53 & n.7 (10th Cir. 2022).

[42] *Id*.

For the reasons stated herein, and in the proceeding to date, an unconditioned grant of T-Mobile's and Columbia Capital's applications would harm the public and competition while obstructing the Commission's goals. In light of the competitive impact of these transactions, T-Mobile's related 600 MHz deal with Comcast, and the Commission's broad reexamination of its spectrum aggregation policies, the Columbia Capital transactions should be held in abeyance while these related matters can be considered. At the appropriate time, when the Commission considers whether to grant the Columbia Capital transactions, DISH renews its call for conditions to offset the demonstrated competitive harms from T-Mobile's ongoing push to dominate low-band spectrum needed for 5G competition.

Sincerely,

/s/ Alison Minea
Vice President, Regulatory Affairs
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Attachment: Exhibit 1

cc (via email):

FCC:
Joel Taubenblatt
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Garnet Hanly
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Monish Kundra
Paul Chisholm
John Leibovitz
Trey Hanbury (Jenner & Block LLP)

AT&T:
Jessica B. Lyons

EXHIBIT 1

#	PEA	PEA Name	Pops 2020 (Ks)	A	B	C	D	E	F	G	TMO Current	+ COL	+XFI	TMO Total
1	PEA003	Chicago, IL	9,522	XFI	TMO	TMO	TMO	COL	COL	DSH	3	1	1	5
2	PEA004	San Francisco, CA	9,808	XFI	TMO	TMO	COL	DSH	DSH	DSH	2	1	1	4
3	PEA005	Baltimore, MD-Washington, DC	8,609	XFI	TMO	TMO	TMO	COL	DSH	DSH	3	1	1	5
4	PEA006	Philadelphia, PA	7,933	XFI	TMO	TMO	TMO	COL	DSH	DSH	3	1	1	5
5	PEA007	Boston, MA	7,299	XFI	TMO	TMO	COL	COL	DSH	DSH	2	2	1	5
6	PEA010	Houston, TX	7,092	BWW	TMO	TMO	XFI	COL	COL	DSH	2	2	1	5
7	PEA011	Atlanta, GA	6,269	BWW	TMO	TMO	COL	XFI	DSH	DSH	2	1	1	4
8	PEA016	Seattle, WA	4,405	XFI	TMO	TMO	TMO	COL	DSH	DSH	3	1	1	5
9	PEA017	Minneapolis-St. Paul, MN	3,751	XFI	TMO	TMO	TMO	COL	DSH	DSH	3	1	1	5
10	PEA027	Salt Lake City, UT	2,542	BWW	TMO	TMO	COL	XFI	DSH	DSH	2	1	1	4

KEY

TMO	T-Mobile USA, Inc.
COL	LB License Co., LLC and Channel 51 License Co., LLC
XFI	Comcast Corporation
DSH	DISH Network Corp and affiliates
BWW	Bluewater Wireless II, L.P.