

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

WASHINGTON, DC
NEW YORK
LONDON
BRUSSELS
SAN FRANCISCO

RECEIVED

DEC 22 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CHRISTINE E. ENEMARK
TEL 202.662.5136
FAX 202.778.5136
CENEMARK@COV.COM

December 22, 2000

BY HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Petition for Declaratory Ruling under Section 310(b)(4) of the
Communications Act of 1934, as Amended
Amendment
IB Docket No. 00-187

Dear Ms. Salas:

Cook Inlet/VS GSM IV PCS, LLC ("CIVS IV") and Cook Inlet/VS GSM V PCS, LLC ("CIVS V"), by their attorneys, hereby respectfully request to amend the above-referenced Petition for Declaratory Ruling (the "Petition"), filed on October 13, 2000, to allow indirect foreign ownership in CIVS IV and CIVS V resulting from the consummation of the transaction between VoiceStream Wireless Corporation ("VoiceStream") and Deutsche Telekom AG ("DT")¹ in excess of the twenty-five percent statutory benchmark pursuant to Section 310(b)(4) of the Communications Act.

Since the Petition for Declaratory Ruling was submitted, CIVS IV has formed a wholly owned subsidiary, CIVS IV License Sub I, LLC ("CIVS IV Sub I"). CIVS IV Sub I, like CIVS IV, will hold and operate certain personal communications services licenses subject to the consent of the Commission to the pending application to assign twelve licenses from DCR PCS, Inc., as debtor-in-possession, to CIVS IV Sub I. See File No. 0000249749 (public notice Nov.

¹ Applications related to the VoiceStream-DT transaction were filed with the Commission on September 18, 2000. See *VoiceStream Wireless Corporation, Powertel, Inc. and Deutsche Telekom AG Seek FCC Consent to Transfer Control of Licenses and Authorizations and Request Declaratory Ruling Allowing Indirect Foreign Ownership*, IB Docket No. 00-187, Public Notice (Oct. 11, 2000).

No. of Copies rec'd 041
List A B C D E

COVINGTON & BURLING

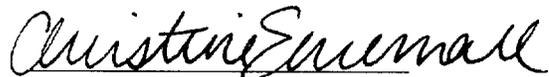
Magalie Roman Salas
December 22, 2000
Page 2

29, 2000). Therefore, CIVS IV hereby requests that any declaratory ruling issued by the Commission in connection with the Petition also be applied to the indirect foreign ownership of CIVS IV Sub I. CIVS IV Sub I, as a wholly owned subsidiary of CIVS IV, will have the same attributable indirect foreign ownership as CIVS IV. Thus, the inclusion of CIVS IV Sub I will not materially change the Commission's analysis. In addition, such an extension is in the public interest for same reasons set forth in the original Petition for CIVS IV and CIVS V.

Please feel free to contact the undersigned counsel if you have any questions regarding this request to amend the Petition.

Respectfully submitted,

**Cook Inlet/VS GSM IV PCS, LLC
CIVS IV License Sub I, LLC
Cook Inlet/VS GSM V PCS, LLC**



Jonathan D. Blake
Christine E. Enemark
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2401
(202) 662-6000

cc: Justin Conner, International Bureau
Claudia Fox, International Bureau
Jackie Ruff, International Bureau