

## Spectrum Equity, Inc.

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March 2, 2017

Via Electronic Filing

[http://esupport.fcc.gov/reports/700\\_guard/submitreport.jsp](http://esupport.fcc.gov/reports/700_guard/submitreport.jsp)

Mobility Division

Wireless Telecommunications Bureau

Federal Communications Commission

445 12<sup>th</sup> Street, S.W.

Washington, D.C. 20554

Re: **2016 Annual Band Manager Report**

To whom it may concern:

Pursuant to Section 27.607 of the Federal Communications Commission's (FCC) rules, Spectrum Equity, Inc. is pleased to provide this Annual Report of its band management services that are utilizing its 220-222 MHz licenses.

As of March 2, 2017, Spectrum Equity, Inc. has three (3) active Spectrum Use Agreements (SUAs), for which the terms, type of system, amount of spectrum and associated call signs are provided below, along with information regarding a WPOI707 spectrum assignment.

WPOI696	-	No current spectrum lease agreements
WPVL861	-	Seven-year, eight 5 kHz pairs, fixed data, expires July 11, 2022
WPOI861	-	No current spectrum lease agreements
WPOI862	-	No current spectrum lease agreements
WPOI707	-	Ten-year lease, one 5 kHz pair, fixed data, expires June 30, 2018;
	-	Ten-year lease, fifteen (15) pairs, fixed data, expires December 31, 2023; and
	-	Channel disaggregation agreement executed on September 1, 2017, for partitioned areas in Sacramento, California and Seattle, Washington.

Please contact the undersigned if additional information is required.

Sincerely,

/s/ **Mark E. Crosby**

Mark E. Crosby  
President

MEC:

**REQUEST FOR WAIVER  
LATE-FILED BAND MANAGER ANNUAL REPORT**

Spectrum Equity, Inc. (“SEI”) requests a waiver of the March 1, 2017 deadline for filing Band Manager Reports pursuant to Federal Communications Commission (“FCC”) Rule Section 27.607 and the acceptance of this late-filed Band Manager Report (“Report”).<sup>1</sup> The Report is being filed one-day late because of an inadvertent oversight in SEI’s administrative processes.

FCC Rule Section 1.925 sets out alternative standards for justifying waiver relief. A request may be granted if (i) the underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and a grant would be in the public interest; or (ii) in light of unique or unusual circumstances, application of the rule(s) would be inequitable, unduly burdensome, or contrary to the public interest, or the applicant has no reasonable alternative.<sup>2</sup> SEI submits that the underlying purpose of the rule would be frustrated if the FCC were to reject the Report as untimely. The purpose of the Report is to provide the FCC and other interested parties with accurate, current information about the utilization of the spectrum under band management. SEI fully appreciates that the FCC wants all such reports filed on or prior to the March 1 deadline, and SEI has submitted its reports on a timely basis in all previous years. However, a one-day delay in the 2016 filing cannot be expected to prejudice parties other than the FCC since the Report is for informational purposes only, and SEI hopes that this very brief waiver extension will not unduly burden the FCC and its processes. Moreover, SEI has no reasonable alternative to requesting acceptance of this one-day waiver of the filing deadline.

For these reasons, SEI respectfully requests that the FCC grant a one-day extension and accept this late-filed Report.

Please contact the undersigned if additional information is required.

Sincerely,

/s/ **Mark E. Crosby**

Mark E. Crosby  
President

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<sup>1</sup> See *Guard Band Licensee and Band Manager Annual Reports Are Due March 1, 2017*, Public Notice, DA 17-120 (rel. Feb. 2, 2017).

<sup>2</sup> 47 C.F.R. § 1.925(b).