

**INCUMBENT 39 GHZ LICENSEE SHORT-FORM APPLICATION (FCC FORM 175-A)
FILING INSTRUCTIONS**

I. INTRODUCTION

1. An Incumbent 39 GHz Licensee Short-Form Application (FCC Form 175-A) provides the information and certifications the Commission needs to provide an incumbent 39 GHz licensee with access to the Commission's Initial Commitment System. An incumbent 39 GHz licensee can use the Initial Commitment System to make an Initial Commitment to (1) accept modified licenses based on the reconfiguration of its 39 GHz spectrum holdings proposed by the Commission, or (2) accept modified licenses based on the incumbent's acceptable alternative reconfiguration, or (3) relinquish spectrum usage rights for all of its existing 39 GHz spectrum holdings in exchange for an incentive payment and the opportunity to bid for new licenses in the auction. An FCC Form 175-A applicant may be an existing 39 GHz licensee, or it may be a party subject to common control with the existing 39 GHz licensee(s) listed in the same FCC Form 175-A. Additional information about FCC Form 175-A can be found in the *Updated Reconfiguration Procedures Public Notice*.¹

II. FCC FORM 175-A FILING DEADLINE

2. Only a 39 GHz incumbent that submits an FCC Form 175-A prior to the close of the FCC Form 175-A filing window will have access to the Commission's Initial Commitment System. FCC Form 175-A must be submitted electronically via the Commission's Auction Application System. The FCC Form 175-A filing window will open at 12:00 p.m. Eastern Time (ET) on July 9, 2019, and close at 6:00 p.m. ET on July 15, 2019. **All FCC Form 175-A applications must be submitted and confirmed prior to 6:00 p.m. ET on July 15, 2019.** As discussed below, after an application has been submitted, a *Confirmation of Submission* screen will appear. The confirmation screen will display the submission time and date, along with a unique file number.

3. Late applications or unconfirmed submissions will not be accepted. Applicants are strongly encouraged to begin working on their FCC Form 175-A applications early and are responsible for allowing adequate time to complete and submit their applications prior to the close of the filing window. Information in an FCC Form 175-A will not be considered by the Commission unless you click on the **CERTIFY & SUBMIT** button on the *Certify & Submit* screen in the Auction Application System after providing or updating the information required in FCC Form 175-A. To reduce the risk of technical complications, do not click the **CERTIFY & SUBMIT** button more than once while waiting for your FCC Form 175-A submission to go through. Applicants are also cautioned that the Commission periodically performs scheduled maintenance of its IT systems. During scheduled maintenance activities, which typically occur over the weekends, every effort is made to minimize any downtime to the auctions systems. However, there are occasions when auction-related systems may be temporarily unavailable.

4. You may make changes to an FCC Form 175-A application at any time during the FCC Form 175-A filing window, however you must click Certify & Submit again in order for your changes to be submitted; otherwise your changes will not be visible to, or given consideration by, Commission staff.

5. You may withdraw a previously submitted FCC Form 175-A at any time before the application filing window closes on July 15, 2019. To do so, click on the **Withdraw Application** icon on the *Review or Modify Existing Incumbent 39 GHz Licensee Short-Form Application* section of the *Auction Application Manager* screen. All previously entered and submitted data will be deleted. For additional information about withdrawing an FCC Form 175-A, see Section V.E. below.

6. An FCC Form 175-A may not be withdrawn after the FCC Form 175-A filing deadline, and as of the FCC Form 175-A filing deadline, an applicant and any 39 GHz licensee(s) listed in an FCC

¹ See *Notice of Updated 39 GHz Reconfiguration Procedures*, Public Notice, DA 19-397 (WTB/OEA May 14, 2019) (*Updated Reconfiguration Procedures Public Notice*).

Form 175-A will be considered to be an applicant in Auction 103 for purposes of section 1.2105(c), the Commission's rule prohibiting certain auction-related communications. For additional information about the prohibition on certain auction-related communications, see Section V.F. below and the *Updated Reconfiguration Procedures Public Notice*.²

7. A 39 GHz incumbent that does not submit an FCC Form 175-A will not be able to access the Initial Commitment System, and will (1) be considered to have committed to accepting modified licenses based on the Commission's proposed reconfiguration (i.e., committed to Initial Commitment Option 1), (2) forgo any opportunity to relinquish any of its 39 GHz spectrum holdings for an incentive payment, and (3) forgo any opportunity to become qualified to bid for any new licenses in Auction 103.³

III. MINIMUM SOFTWARE REQUIREMENTS

8. You must complete and submit FCC Form 175-A via the Internet using a personal computer or equivalent device. **Currently, devices that use Apple® Mac OS® are not supported. Smart phones and tablets are also not currently supported.** A web browser must be used to access the Auction Application System. The following web browsers are compatible with the Auction Application System:

- Mozilla® Firefox®;
- Google Chrome® 46.0.2490.80 or higher; or
- Microsoft® Internet Explorer 9.0 or higher (Microsoft Edge is not supported; compatibility mode is also not supported, so if you use an Internet Explorer browser, you must turn off compatibility mode in your browser's settings).

However, for optimal performance, Commission staff recommends the use of either Mozilla® Firefox® or Google Chrome®.

9. A PDF viewer is also required. Adobe Acrobat Reader 5.0 or higher is recommended (available at no cost at www.adobe.com/).

10. The minimum screen resolution for the Auction Application System is 1024 x 768.

IV. LOGGING IN

11. To submit an FCC Form 175-A, open a web browser and navigate to auctions.fcc.gov (primary location) or auctions2.fcc.gov (secondary location). An applicant must have an FCC Registration Number (FRN) and password in order to log in to the FCC's Auction Application System and complete an FCC Form 175-A. You may obtain an FRN by registering through the Commission Registration System (CORES), which can be accessed on the Commission's website at: apps.fcc.gov/corecs. Upon registration, you will be assigned an FRN.

12. On the *Auction Application System* screen, enter the applicant's FRN and password and click the **LOG IN** button, which will take you to the *My Auctions Page* screen. On this screen, you may create a new or modify an existing Incumbent 39 GHz Licensee Short-Form Application (FCC Form 175-A) by clicking on the **Click here for FCC Form 175-A** link, which is under the "Wireless/Broadcast" heading. This will take you to the *Auction Application Manager* screen. Select the **Auction 103** link to begin, review, modify, or withdraw an Incumbent 39 GHz Licensee Short-Form Application (FCC Form 175-A). Please allow up to several minutes for your application to load when you create a new application or access a draft application you have already created to review or modify it. To avoid technical complications, do not click the link more than once while waiting for the application to load.

² See *Updated Reconfiguration Procedures Public Notice*, DA 19-397, at paras. 35-37.

³ See *Updated Reconfiguration Procedures Public Notice*, DA 19-397, at para. 8.

13. Applicants will not be able to access the Initial Commitment System from the *My Auctions Page* screen.

V. SECTIONS OF THE FCC FORM 175-A

14. You must provide information or responses to questions on a series of screens within FCC Form 175-A. Below is a summary of the different screens and the information that must be submitted on each. The sections following this summary provide more detailed instructions on how to fill out and provide the information required on each screen.

- *Applicant Information* screens:
 - Provide identifying information regarding the applicant, including its legal classification, its contact person, its Initial Commitment Representative(s), and the FRNs of all licensees in addition to the applicant with existing 39 GHz licenses being consolidated in the FCC Form 175-A
- *Summary* screen:
 - Review the results of the system’s automated check for certain inconsistencies and omissions in the application
- *Certify & Submit* screen:
 - Review and make the required certifications
 - Submit the application

15. *Navigation*. You may access any of these screens via the navigation pane on the right side of the screen titled “Application Sections.”⁴ To expand a group of screens, click on the triangle symbol (▾) to the right of the section title. When you click on the relevant section, you will be redirected to that section of the application. When a cursor passes over a clickable item, the cursor will turn into a hand icon.

16. *Help and Common Questions*. Help in filling out FCC Form 175-A is available in two ways through the Auction Application System: (1) by clicking on the inline **Help** link located in each section of the application and in the upper right corner of each screen, which will open Auction Application Online Filing Help; or (2) by clicking on the text of any **Common Questions** link that appears on the right side of the screen. If you need further information or guidance beyond what is provided by these sources, use the contact information provided in Section IX. of these instructions. You may also access an online tutorial regarding the FCC Form 175-A, which is available on the “Education” tab of the Auction 103 website at www.fcc.gov/auction/103. This tutorial will help familiarize potential applicants with accessing and navigating the Auction Application System and completing FCC Form 175-A.

A. Applicant Information

17. On the *Applicant Information* screens, you must provide the information listed below. Additional guidance about how to fill out these items follows this list.

- The applicant’s legal classification (e.g., individual, corporation, general partnership, etc.)
- The applicant’s name
- The applicant’s citizenship (for individuals) or jurisdiction of formation (for legal entities)

⁴ To reduce the risk of technical complications, you are encouraged to click buttons on the individual application pages/screens and in the navigation window pane only once while navigating through the form.

- The applicant’s address (must be a physical location; a P.O. Box is not permitted)
- The name, address, telephone and fax number, and email address of a contact person who will communicate with the Commission on behalf of the FCC Form 175-A applicant⁵
- The names, telephone numbers, and email addresses of up to three persons authorized to submit an Initial Commitment on behalf of the applicant and any licensees with existing 39 GHz licenses that are being consolidated for purposes of Auction 103 that are listed in the same FCC Form 175-A
- An indication of whether there are any existing 39 GHz licenses to be consolidated in the application for purposes of Auction 103 and, if so, the FRN for each licensee with existing 39 GHz licenses that are being consolidated in the FCC Form 175-A

1. Applicant Legal Classification

18. You must indicate the applicant’s legal classification on the *Applicant Legal Classification* screen before continuing to subsequent screens because the selected legal classification will determine which subsequent screens will appear. For example, an applicant registering as an “Individual” will enter information that is different from the information that an applicant registering as a “Corporation” will enter. If you select “Other” as the applicant’s legal classification, a text box will open in which you must describe the applicant’s legal classification.⁶

2. Applicant Name and Applicant Address

19. On the *Applicant Name/Applicant Address* screen, the data entry fields will depend on which legal classification you selected on the *Applicant Legal Classification* screen. For instance, if you selected “Individual” on the *Applicant Legal Classification* screen, you will be required to complete the First Name, Last Name, and Citizenship fields. The Middle Initial and Suffix fields are optional. If you selected “Corporation” on the *Applicant Legal Classification* screen, you will be required to complete the Entity Name and Jurisdiction of Formation fields. You must also provide a street address for the applicant. A P.O. Box may not be used. After completing the applicant’s name and address information, click the **SAVE & CONTINUE** button.

3. Contact Information

20. The screen that appears after the *Applicant Name/Applicant Address* screen is the *Contact Information/Contact Address* screen, where you will be required to provide contact information for an individual who will be sent all correspondence concerning the FCC Form 175-A. To simplify filling out FCC Form 175-A, an applicant that has the same address as its contact person can click on the **COPY APPLICANT ADDRESS** button to automatically fill in the contact person’s address.⁷ A P.O. Box may not be used for a contact person’s address. After entering the contact person’s name, address, and other required information, click the **SAVE & CONTINUE** button.

21. Commission staff will communicate only with an applicant’s contact person or certifying official, as designated on the applicant’s FCC Form 175-A, unless the applicant’s contact person or certifying official notifies the Commission in writing that the applicant’s counsel or other representative is

⁵ A fax number may be used for a variety of purposes, including as a backup for communicating with the applicant in the event other means of communication are unavailable. If the contact person does not have a fax number, you may provide the contact person’s telephone number in the fax number field.

⁶ For any text box in which the applicant can or is required to enter information, you should not use any non-ASCII characters or select ASCII characters.

⁷ The **COPY APPLICANT ADDRESS** button is not available if the applicant’s location is outside of the United States.

authorized to speak to Commission staff on its behalf. Such authorizations may be sent by email to 39GHzReconfiguration@fcc.gov.

4. Initial Commitment Representatives

22. You must provide the name, phone number, and email address for each individual authorized to submit an Initial Commitment on behalf of the applicant and any licensees with existing 39 GHz licenses being consolidated for purposes of Auction 103 that are listed in the same FCC Form 175-A. You must identify at least one such Initial Commitment Representative, and no more than three.⁸ Applicants are encouraged to identify more than one Initial Commitment Representative to account for unforeseen circumstances that may result in an Initial Commitment Representative being unable to participate in the Initial Commitment process.

23. Only individuals listed as Initial Commitment Representatives in an FCC Form 175-A application will be authorized to submit an Initial Commitment on behalf of the applicant and any licensees with existing 39 GHz licenses being consolidated for purposes of Auction 103 that are listed in the same FCC Form 175-A. To avoid any potential violation of the Commission's rule prohibiting certain auction-related communications, the same individual should not be designated as an Initial Commitment Representative in more than one FCC Form 175-A.

24. After entering the necessary information for each Initial Commitment Representative, you must click the **ADD** button to save the Initial Commitment Representative information you have entered.⁹ While an applicant may change its Initial Commitment Representatives at a later date, only those Initial Commitment Representatives listed in its FCC Form 175-A will be authorized to submit an Initial Commitment on behalf of the applicant and any licensees with existing 39 GHz licenses being consolidated for purposes of Auction 103 that are listed in the same FCC Form 175-A. Each Initial Commitment Representative listed in an applicant's FCC Form 175-A will be provided with a designated SecurID® token that will be required in order to submit an Initial Commitment, along with instructions on how to use the token and how to participate in the Initial Commitment process.¹⁰

5. Additional 39 GHz Licenses To Be Consolidated

25. On the *Additional 39 GHz Licenses To Be Consolidated* screen, you must indicate, by responding "Yes" or "No," whether there are any existing 39 GHz licenses to be consolidated in the application for purposes of Auction 103.

26. If there are no existing 39 GHz licenses to be consolidated in the application for purposes of Auction 103, select "No" as your response, and then click the **SAVE & CONTINUE** button to continue completing your FCC Form 175-A.

27. If there are existing 39 GHz licenses to be consolidated in the application for purposes of Auction 103, select "Yes" as your response, and then enter the FRN for each licensee with existing 39 GHz licenses that are being consolidated in the FCC Form 175-A for purposes of Auction 103 in the **FRN** field in the *Identify FRNs* section of this screen. You must click the **ADD** button to add/save each FRN entry. After you have added the FRN for each licensee with existing 39 GHz licenses being consolidated

⁸ See *Updated Reconfiguration Procedures Public Notice*, DA 19-397, at para. 31.

⁹ To reduce the risk of technical complications, click the **ADD** button only once when adding an Initial Commitment Representative.

¹⁰ For security purposes, the SecurID® tokens will be sent only to the applicant's contact person at the contact address listed on the FCC Form 175-A. See *Notice of Initial 39 GHz Reconfiguration Procedures; Preparation for Incentive Auction of Upper Microwave Flexible Use Service Licenses in the 37 GHz, 39 GHz, and 47 GHz Bands (Auction 103); Order of Modification; 39 GHz License Transfer and Assignment Freeze*, Public Notice, DA 19-196, at para. 58 (WTB/OEA Mar. 20, 2019) (*Initial 39 GHz Reconfiguration Procedures Public Notice*).

in the FCC Form 175-A for purposes of Auction 103, click the **SAVE & CONTINUE** button to continue completing your FCC Form 175-A.

B. Summary

28. The *Summary* screen summarizes the information provided in the previous screens. This screen will appear prior to the *Certify & Submit* screen and allows you to review the information you entered on previous screens and to check for inconsistencies or omissions in the information entered.

29. The *Error Summary* screen lists the sections of the application and displays any error and warning messages for each section. If errors are detected, you can click on the application section link and section name, and then make any necessary corrections. An error message will be removed once it is corrected. When all errors have been corrected, click the **CONTINUE TO CERTIFY** button. You will not be able to proceed to the *Certify & Submit* screen if any error messages appear on the *Error Summary* screen.

30. Each applicant is solely responsible for providing complete and accurate information in its FCC Form 175-A. The automated check for errors is provided to assist applicants in completing FCC Form 175-A. However, the automated check may not catch all errors, and an applicant cannot rely on the automated check to determine the completeness or the accuracy of submitted information. In addition, although you will be able to proceed to the *Certify & Submit* screen even if you receive a warning message, you should try to address or correct any issues identified in a warning before submitting your application, if possible. You should not assume that the ability to certify and submit FCC Form 175-A with a warning message indicates that the subject of the warning will not affect whether the applicant will be able to participate in the Initial Commitment process.

31. If the automated check does not reveal certain inconsistencies or omissions, each application section will display the message “No errors” with a green checkmark. Once this happens, you may then click the **CONTINUE TO CERTIFY** button.

C. Attachments

32. Should an applicant want or need to provide information to support its application that cannot be entered directly on the FCC Form 175-A screens (e.g., information regarding the relationship between the applicant and any licensees with existing 39 GHz licenses being consolidated for purposes of Auction 103 that are listed in the FCC Form 175-A), such information should be provided in an attachment. You can add an attachment to FCC Form 175-A via the *Application Attachments* screen by clicking the **Attachments** link in the upper right of any screen. This screen requests information regarding the type of attachment to be added, the file to be attached, and a brief description of the attachment.

33. You must select an attachment “Type” from the dropdown list on the *Application Attachments* screen for any attachments the applicant needs or wishes to submit in support of its application. Although the only attachment type available for the FCC Form 175-A is “Supporting Information,” you will still need to select this attachment type in order to be able to upload any attachments to the application.

34. After selecting the file you wish to attach to the application, click the **UPLOAD FILE** button. You may experience a short delay as the system processes an uploaded attachment. A list of any attachments already uploaded to an applicant’s FCC Form 175-A, along with the attachment type and description, and the date that the attachment was uploaded, will display at the bottom of the *Application Attachments* screen.

35. When uploading attachments, you may use a variety of file formats, including Word (.doc and .docx), Adobe PDF (.pdf), and text files (.txt and .odt). Any files uploaded will be automatically converted to a .pdf format. You must verify that the files contain all attachment information. Any uploaded files may be no larger than 10 MB each and must not be password protected. Graphics files

(e.g., .bmp, .tiff, .jpg) are not supported. Spreadsheets (.xls, .xlsx, and .csv) are supported but are not recommended.

36. Once all attachments are uploaded, click the **CONTINUE** button. After the FCC Form 175-A filing deadline, an application attachment may not be deleted or withdrawn. If an applicant needs to modify/update information provided in an attachment after the FCC Form 175-A filing deadline, it must submit a new attachment with the modified/updated information and indicate that the new attachment replaces the previously submitted attachment.

D. Certify and Submit

37. The *Certify & Submit* screen provides several certifications required of all FCC Form 175-A applicants. The *Certify & Submit* screen also requests that the applicant's certifying official be identified and sign the application.

38. An FCC Form 175-A must be certified by a person with the authority to bind the applicant and any licensees with existing 39 GHz licenses being consolidated for purposes of Auction 103 that are listed in the same FCC Form 175-A. In the event that changes are made to any of the information in FCC Form 175-A after the application filing deadline, the person that originally certified the application will have to certify the changes as well. The person certifying the application cannot be changed in the Auction Application System after the FCC Form 175-A filing deadline.

39. Applicants are reminded that submission of an FCC Form 175-A constitutes a representation by the person certifying that he or she is an authorized representative with the authority to bind the applicant and any licensees with existing 39 GHz licenses being consolidated for purposes of Auction 103 that are listed in the same FCC Form 175-A, and has read the form's certifications. Submission of an FCC Form 175-A also constitutes a representation by the person certifying that the contents of the application (including any attachments) and its certifications are true, complete, and correct. Submission of a false certification may result in penalties, including monetary forfeitures, license forfeitures, ineligibility to participate in future auctions, and/or criminal prosecution.

40. Once the *Certify & Submit* screen has been filled out, click on the **CERTIFY & SUBMIT** button to submit the application.¹¹ Information in an FCC Form 175-A will not be visible to, or given consideration by, the Commission unless the applicant's certifying official clicks the **CERTIFY & SUBMIT** button on this screen to submit the application and receives a confirmation of submission for the application.

41. After an FCC Form 175-A has been submitted, a *Confirmation of Submission* screen will be displayed that states the submission time and date, along with a unique file number. The applicant is strongly encouraged to print or save a copy of the *Confirmation of Submission* screen for its records. The applicant may view and print copies of its submitted FCC Form 175-A (excluding any uploaded attachments) by clicking on the **Print** link under the file number on the *Confirmation of Submission* screen or by clicking the **Print** link in the upper right of any screen in the application. To print the application once it displays, right click on the screen and select "Print." To create a PDF copy of the application that can be saved to your computer, right click on the screen and select "Adobe Acrobat," and then "Convert Webpage to Adobe PDF."

42. Any attachments the applicant has uploaded to the application can only be printed from the *Application Attachments* screen. Click on the **Attachments** link at the top of any screen in the FCC Form 175-A to reach the *Application Attachments* screen. Once on the *Application Attachments* screen, click

¹¹ Please allow up to several minutes for processing once you click the **CERTIFY & SUBMIT** button. To avoid technical complications, do not click the **CERTIFY & SUBMIT** button more than once while waiting for the system to process your submission.

the link associated with the attachment in the File Name column in the bottom section of the screen to display the attachment and use the document print function to print it.

43. FCC Form 175-A applications must be submitted and confirmed prior to 6:00 p.m. ET on July 15, 2019. Late applications or unconfirmed submissions will not be accepted.

E. Withdrawing an FCC Form 175-A

44. An applicant may withdraw its FCC Form 175-A application only during the FCC Form 175-A filing window. To withdraw a submitted application before the FCC Form 175-A filing deadline, click on the **Withdraw Application** icon on the *Review or Modify Existing Incumbent 39 GHz Licensee Short-Form Application* section of the *Auction Application Manager* screen. The entire FCC Form 175-A, including all previously submitted data and any uploaded attachments, will be deleted. An application may not be withdrawn after the FCC Form 175-A filing deadline of 6:00 p.m. ET on July 15, 2019.

F. Prohibition on Certain Auction-Related Communications

45. As of the FCC Form 175-A filing deadline, an FCC Form 175-A applicant and any 39 GHz licensees listed in an FCC Form 175-A will be considered to be an applicant in Auction 103 for purposes of section 1.2105(c) of the Commission's rules, which prohibits certain auction-related communications from the short-form application deadline until the post-auction deadline for down payments on new licenses.¹² The prohibition period begins at the FCC Form 175-A filing deadline on July 15, 2019 at 6:00 p.m. ET, and continues until the deadline for submitting down payments after the close of Auction 103.

46. Once the prohibition period begins, those considered applicants under section 1.2105(c) should avoid any communications with each other that may violate the prohibition, e.g., communicating information about Initial Commitments. A public notice announcing the public availability of submitted FCC Form 175-A applications will be released in advance of the date on which the Initial Commitment filing window opens, which will allow applicants and other interested parties to identify all the parties to which the prohibition applies, including any applicants that are not 39 GHz licensees but are commonly controlled with known 39 GHz licensees.¹³ In addition, applicants filing FCC Form 175, who also are covered by section 1.2105(c), will be identified by public notice subsequent to the filing deadline for that form.¹⁴

47. An FCC Form 175-A applicant should carefully review the *Updated 39 GHz Reconfiguration Procedures Public Notice* for more information about the rule prohibiting certain auction-related communications and how to comply with its requirements, and for guidance on the application of the rule to FCC Form 175-A applicants.¹⁵

48. An applicant that makes or receives a prohibited communication must report the communication to the Commission in writing as promptly as possible, and in no case more than five business days after the communication occurs. Any party reporting such a communication must take care to ensure that any such report does not itself give rise to a violation of section 1.2105(c). To minimize the risk of inadvertent dissemination of a report of a potential prohibited communication, section 1.2105(c)(6)

¹² See *Updated Reconfiguration Procedures Public Notice*, DA 19-397, at paras. 35-37.

¹³ See *Reconfigured 39 GHz Incumbent Holdings; Initial Commitment Options and Timeline; Preparation for Incentive Auction of Upper Microwave Flexible Use Service Licenses in the Upper 37 GHz, 39 GHz, and 47 GHz Bands (Auction 103)*, Public Notice, DA 19-503, para. 18 (WTB/OEA June 5, 2019).

¹⁴ *Id.*

¹⁵ See *Updated Reconfiguration Procedures Public Notice*, DA 19-397, at paras. 35-37.

of the Commission's rules requires a party to file only a single report, which should be submitted to the Chief of the Auctions Division in the Office of Economics and Analytics.¹⁶

G. Viewing and Making Changes to an Existing FCC Form 175-A Application

49. The *Review or Modify Existing Incumbent 39 GHz Licensee Short-Form Application* section of the *Auction Application Manager* screen displays any FCC Form 175-A application created or submitted within the FCC Form 175-A application filing window. This screen shows the application status, the date and time the application was last modified, and the date and time the application was last submitted. It may be used as a reference to confirm the date and time of the most recent submission of an FCC Form 175-A.

50. To review or continue working on an existing FCC Form 175-A during the FCC Form 175-A filing window, click "Auction 103", which will display the *Summary* screen for the FCC Form 175-A in a view/edit mode. To submit your FCC Form 175-A for the first time, or to submit any changes to an FCC Form 175-A you already submitted for which you have received a file number, go to the *Certify Application* screen and click the **CERTIFY & SUBMIT** button. After the new or revised FCC Form 175-A has been submitted, a *Confirmation of Submission* screen will display the application's file number and submission time and date. An applicant is strongly encouraged to print or save a copy of the confirmation page for its records. As noted above, though you may make changes to an FCC Form 175-A application at any time during the FCC Form 175-A filing window, information in an FCC Form 175-A will not be visible to, or considered by, the Commission unless you click on the **CERTIFY & SUBMIT** button on the *Certify & Submit* screen in the Auction Application System after providing or updating the information required in FCC Form 175-A.

51. As when initially submitting an FCC Form 175-A, after submitting changes to a previously submitted FCC Form 175-A, you may view and print copies of your revised submitted FCC Form 175-A (excluding any uploaded attachments) by clicking on the **Print** link under the file number on the *Confirmation of Submission* screen or by clicking the **Print** link in the upper right of any screen in the application. To print the application once it displays, right click on the screen and select "Print." To create a PDF copy of the application that can be saved to your computer, right click on the screen and select "Adobe Acrobat," and then "Convert Webpage to Adobe PDF."

52. Any attachments you have uploaded to your application can only be printed from the *Application Attachments* screen. Click on the **Attachments** link at the top of any screen in the FCC Form 175-A to reach the *Application Attachments* screen. Once on the *Application Attachments* screen, click the link associated with the attachment in the File Name column in the bottom section of the screen to display the attachment and use the document print function to print it.

53. After the FCC Form 175-A filing window closes, an applicant will be able to view and print its submitted FCC Form 175-A application, but the applicant's ability to modify its FCC Form 175-A directly in the Auction Application System will be limited. During the time period between the close of the FCC Form 175-A filing window and when the Commission sends out the SecurID® tokens, at times when the Auction Application System is open and available to applicants, an applicant will be permitted to modify only the applicant's address, the contact information (e.g., name, address, telephone number, etc.), and its Initial Commitment Representative(s) in the Auction Application System. Once the Commission has sent out the SecurID® tokens, an applicant will no longer be able to modify its Initial Commitment Representative(s) in the Auction Application System, but will continue to be able to modify the applicant's address and the contact information (e.g., name, address, telephone number, etc.) in the system. In the event an applicant needs to make changes to its FCC Form 175-A that it cannot make

¹⁶ An applicant that needs to submit such a report is strongly encouraged to consult with the Auctions Division staff prior to submitting the required report.

directly in the Auction Application System, the applicant should contact the Auctions Division staff to discuss how any such changes can potentially be made.

VI. REVIEW OF FCC FORM 175-A APPLICATIONS

54. After the deadline for filing FCC Form 175-A, Commission staff will review all timely submitted FCC Form 175-A applications and will advise an applicant if any changes are needed and how they can be made.

55. Absent any issues or concerns with an applicant's FCC Form 175-A, a designated SecurID® token for each Initial Commitment Representative listed in the FCC Form 175-A, along with instructions about how to use the token and additional information about how to access the Initial Commitment System and participate in the Initial Commitment process, will be sent to the applicant's contact person at the contact address listed in the FCC Form 175-A.¹⁷

VII. PUBLIC AVAILABILITY OF FCC FORM 175-A INFORMATION

56. All information submitted in an FCC Form 175-A application will generally be made publicly available. Accordingly, an applicant should take care not to include any unnecessary sensitive information, such as Taxpayer Identification Numbers or Social Security Numbers, in its FCC Form 175-A. An applicant may request that information submitted in its FCC Form 175-A not be made routinely available for public inspection following the procedures set forth in Section 0.459 of the Commission's rules.¹⁸ Such requests must be included as an attachment to the applicant's FCC Form 175-A and must, among other things, identify the specific information to which the request applies.¹⁹

57. Applicants are cautioned that requests for confidential treatment of information submitted in an FCC Form 175-A will not be routinely granted. The Commission has held generally that it may publicly release confidential business information where the party has put that information at issue in a Commission proceeding or where the Commission has identified a compelling public interest in disclosing the information.²⁰

VIII. ACCESS TO VIEW FCC FORM 175-A APPLICATIONS

58. FCC Form 175-A applicants and other interested parties may view submitted FCC Form 175-A applications on the FCC's website once they are made publicly available by the Commission by searching for them in the Commission's database. A public notice announcing the public availability of submitted FCC Form 175-A applications will be released in advance of the date on which the window for submitting Initial Commitments opens. To start a search, go to either auctions.fcc.gov (primary location) or auctions2.fcc.gov (secondary location) and click the Auction Application Search link in the "Public Access" area on the Auction Application System screen.

IX. CONTACT INFORMATION

59. For further information regarding FCC Form 175-A, contact the appropriate individual or office listed below:

¹⁷ See *Initial 39 GHz Reconfiguration Procedures Public Notice*, DA 19-196, at para. 58.

¹⁸ 47 CFR § 0.459.

¹⁹ The procedure for uploading attachments to FCC Form 175-A is described in Section V.C. (Attachments).

²⁰ See *Examination of Current Policy Concerning Treatment of Confidential Information Submitted to the Commission*, Report and Order, 13 FCC Rcd 24816, 24822-23, para. 8 (1998).

Federal Communications Commission

FCC Auctions Hotline

General Auction Questions
Auction Process and Procedures

(888) 225-5322, option two; or
(717) 338-2868
Hours of service: 8:00 a.m. – 5:30 p.m. ET,
Monday through Friday

**Broadband Division,
Wireless Telecommunications Bureau**
For Upper Microwave Flexible Use Service
(UMFUS) questions

Simon Banyai at (202) 418-2487

Auctions Division, Office of Economics and Analytics

For general auction questions:
For auction legal questions:

Auctions Hotline at (717) 338-2868
Erik Salovaara at (202) 418-0660

Technical Support

Electronic Filing
Auction Application System (Hardware/Software
Issues)

(877) 480-3201, option nine; or (202) 414-1250
(202) 414-1255 (TTY)
Hours of service: 8:00 a.m. – 6:00 p.m. ET,
Monday through Friday

FCC Forms

(800) 418-3676 (outside Washington DC)
(202) 418-3676 (in the Washington DC area)
www.fcc.gov/forms

Consumer and Governmental Affairs Bureau

For Accessible Formats

(202) 418-0530
(202) 418-0432 (TTY)
fcc504@fcc.gov

Office of Communications Business Opportunities

For questions concerning small business
inquiries

(202) 418-0990
www.fcc.gov/ocbo

FCC Internet Sites

www.fcc.gov
www.fcc.gov/auction/103

Electronic Code of Federal Regulations

www.ecfr.gov