

DESCRIPTION OF TRANSACTION; PUBLIC INTEREST STATEMENT

Introduction

In this application, AT&T Mobility Spectrum LLC (“AMS”) and Commnet of Nevada, LLC (“Commnet”) seek Commission consent to assign from AMS to Commnet the 10 MHz of AWS C block spectrum licensed under call sign WQGT886 in a partitioned area consisting of Washoe County, NV (the “Assigned Area”). This transaction will enable Commnet, a wholly-owned indirect subsidiary of Atlantic Tele-Network, Inc. (“ATN”),¹ to enhance and expand its existing wireless services in the Assigned Area. ATN is well-known for its long history of providing quality wireless services to otherwise unserved or underserved areas across the West and Southwest. This transaction also satisfies in part the spectrum divestiture obligations of AMS’s ultimate corporate parent, AT&T Inc. (“AT&T”), in connection with the *AT&T/Leap Merger Order*.² Thus, this transaction is in the public interest.

No Subscriber Disruption

AT&T is *not* exiting the wireless marketplace in the Assigned Area. AT&T is to assign only a portion of its CMRS spectrum holdings in the Assigned Area, and AT&T will continue to serve the Assigned Area, using its other spectrum. Thus, there will be no reduction in the number of wireless providers in the Assigned Area, and no disruption to AT&T’s existing subscribers.

No Spectrum Aggregation or Market Power Issues

Nor does this transaction implicate the Commission’s spectrum screen or require any review as to potential accumulation of market power by Commnet in the Assigned Area. Each of the national wireless carriers – AT&T, Verizon Wireless, Sprint and T-Mobile – holds and will continue to hold its own wireless spectrum in the Assigned Area.

Commnet currently holds 25 MHz of cellular spectrum covering only a very small portion of Washoe County. According to the US Census Bureau, Washoe County is 6,302 square miles in size, with most of its population residing in the Reno metro area. Commnet has one cell site licensed under call sign KNKN223 (location 52), located in a rural, sparsely-populated portion of northern Washoe County, far beyond the northern edge of the Reno metro

¹ ATN’s latest ownership information is set forth in the latest Form 680 application of Commnet Wireless, LLC, Lessee’s direct 100% parent and a direct wholly-owned subsidiary of ATN, which is FCC File No. 0006226473.

² In re Applications of Cricket Wireless Company, LLC for Consent To Transfer Control of Authorizations, *Memorandum Opinion and Order*, WT Docket No. 13-93, Appendix D (rel. March 13, 2014) (AT&T to divest 10 MHz of AWS-1 spectrum in CMA171 -- Reno, NV).

area. (Indeed, this portion of Washoe County is so sparsely populated that it is the site of the annual “Burning Man” festival.) This cell site covers an area of approximately 1,342 square miles, not all of which coverage is even in Washoe County.

Within that portion of the coverage area of call sign KNKN223 lying within Washoe County, this lease transaction will bring Commnet (and thus ATN) from the current 25 MHz of spectrum up to 35 MHz of spectrum, which is nowhere near enough to trigger the Commission’s spectrum screen. As to the remaining portion of Washoe County (*i.e.*, the vast bulk of Washoe County), neither Commnet nor ATN holds any spectrum whatsoever, and this lease transaction will bring Commnet from having no spectrum holdings whatsoever up to 10 MHz of spectrum.

Accordingly, this proposed lease transaction raises absolutely no spectrum aggregation issues and is ripe for immediate grant.