

Law Offices of  
**Bennet & Bennet, PLLC**

1000 Vermont Avenue, N.W., 10<sup>th</sup> Floor  
Washington, DC 20005

*Caressa D. Bennet*  
*Michael R. Bennet*  
*Marjorie G. Spivak*  
*Gregory W. Whiteaker*  
*Edward D. Kania*  
*Robin E. Tuttle*  
*A lisa M. Everts\**  
*Donald L. Herman, Jr.*

\_\_\_\_\_  
Tel: (202) 371-1500  
Fax: (202) 371-1558

\_\_\_\_\_  
e-mail: [mail@bennetlaw.com](mailto:mail@bennetlaw.com)  
<http://www.bennetlaw.com>

Of Counsel  
**Philip E. Bennet\*\***

Telecommunications Analyst  
**Ken C. Johnson**

  
\*Admitted in Virginia Only  
\*\*Admitted in New York Only

**VIA OVERNIGHT DELIVERY**

October 29, 1999

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

**REQUEST FOR CONFIDENTIAL TREATMENT OF TIN INFORMATION**

Re: **New Mexico RSA 6-111 Partnership  
Ownership Disclosure Form (FCC Form 602)**

**Submitted in conjunction with Applications For Pro *Forma* Transfer of  
Partnership Interests  
File Nos. 0000041813 & 0000041903**

Dear Sir/Madam:

Transmitted herewith, on behalf of New Mexico RSA 6-III Partnership ("Partnership"), pursuant to 47 C.F.R. § 1.2112(a), is a Federal Communications Commission ("FCC" or "Commission") Ownership Disclosure Form (FCC Form 602). The Ownership Form is being filed in conjunction with the above-referenced applications seeking FCC consent to the *pro forma* transfer of minority partnership interests from PVT Networks, Inc. ("PVT") and Yucca Telecommunications Systems, Inc. ("Yucca") to Leaco Wireless, LLC ("Leaco Wireless"). The Ownership Form reflects the future ownership of the Applicant upon consummation of the proposed transaction.

Although the Commission has stated that TIN and SSN information will not "be available to the public or Commission staff through ULS,"<sup>1</sup> The partnership is nonetheless concerned about possible disclosure of this highly sensitive information. Although the information

---

<sup>1</sup>*In the Matter of Biennial Regulatory Review -Amendment of Parts 0, 1, 13, 22, 24, 26, 27, 80, 87, 90, 95, 97 and 101 of the Commission's Rules to Facilitate the Development and Use of Universal Licensing System in the Wireless Telecommunications Services, Report and Order, WT Docket No. 98-20 (rel. October 21, 1998).*

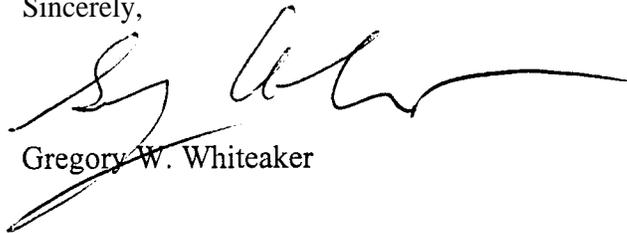
October 29, 1999

Page 2

contained in this FCC Form 602 will be manually scanned into the FCC's Universal Licensing System (ULS) database and the TIN information will therefore not be made available to the public via the ULS, the Partnership requests that the FCC take whatever action is necessary to ensure that the TINs on the paper copy-of the filing **are not** inadvertently made available to the public. The Partnership therefore requests that the un-redacted paper copy not be placed in the station's public file.

Please date-stamp the attached copy of the Ownership Report and return the document to us via the enclosed self-addressed stamped envelope. Should you have any questions concerning this matter, please communicate directly with the undersigned.

Sincerely,



Gregory W. Whiteaker

Enclosures



FCC 602  
Main Form

FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services

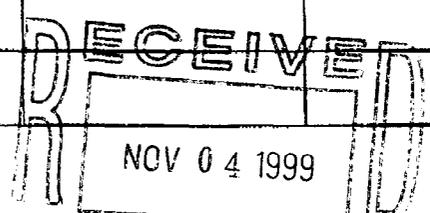
Approved by OMB  
3060 - 0799  
See instructions for  
publicburdenestimate

Applicant/Licensee Information

1) First Name (if individual);	MI:	Last Name:	Suffix:
2) Applicant Name (if entity): New Mexico RSA 6-III Partnership			3) Applicant TIN:

Related FCC Regulated **Businesses** of Applicant/Licensee

4a) Name and address of all FCC Regulated Businesses owned by Applicant/Licensee (use additional sheets, if necessary):	4b) Principal Business:	4c) TIN:	4d) Percent of Interest Held:



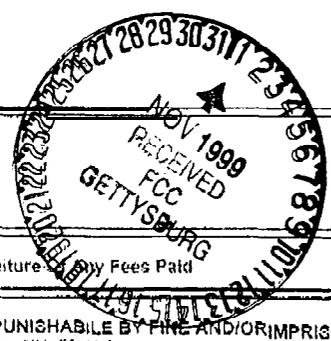
Signature

5) Typed or Printed Name of Patty Authorized to Sign

First Name: John	MI: E.	Last Name: Smith	Suffix:
---------------------	-----------	---------------------	---------

Title:  
Executive Vice President & General Manager

Signature:  
*John E. Smith*



Date:  
10-27-99

Failure To Sign This Application May Result In Denial Of The Application And Forfeiture of Any Fees Paid

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCQ 602  
Schedule A

FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services

Approved by OMB

3060-0799  
See instructions for  
public burden estimate

Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable interest Holder's First Name (if individual):		MI:	Last Name:	suffix:
2) Disclosable Interest Holder's Name (if entity): Leaco Rural Telephone Cooperative, Inc.			3) Disclosable Interest Holder's TIN:	
4) Disclosable Interest Holder's Address: 1500 North Love Street, Lovington, NM 88260				
5) Type of Interest in Applicant (I) (refer to Instructions for list)	6) Disclosable Interest Holder is a(n): (C) (refer to instructions for list of codes):		7) Percent of Interest Held in Applicant: 100% Voting	
8) Disclosable interest Holder's Type of Ownership (refer to instructions for list). (G)			9) Disclosable Interest Holder's Country of Citizenship: U.S.	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): Leaco Rural Telephone Cooperative, Inc. (Leaco Telephone) owns 100% of Leaco Cellular, Inc., which directly owns 71.875% of the Applicant. Leaco Cellular owns 100% of Leaco Wireless Company, LLC which owns the remaining 28.125% of the Applicant. Leaco Telephone is wholly-owned by its subscribers, and no signal subscriber owns a 10% or greater interest.				

Related FCC Regulated Businesses of Disclosable Interest Holder (repeat for each interest holder identified)

11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	11b) Principal Business:	11c) TIN:	11d) Percent of Interest Held:
Leaco Cellular, Inc.	Mobile Telecommunications		100%
Leaco Wireless, LLC	Holding Company		100% indirect