

Law Offices of  
***Bennet & Rennet, PLLC***  
1019 Nineteenth Street, N.W., Suite 500  
Washington, DC 20036

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

***Tel: (202) 530-9800***  
***Fax: (202) 530-9805***

***e-mail: mail@bennetlaw.com***  
***http://www.bennetlaw.com***

***\*Admitted in Alabama Only***

Of Counsel  
***Philip E. Bennet\*\****  
Telecommunications Policy Analyst  
***Ken C. Johnson***

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

**VIA OVERNIGHT DELIVERY**

September 15, 1999

Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

**REQUEST FOR CONFIDENTIAL TREATMENT OF TIN AND SSN  
INFORMATION**

Re: **NSP, L.C.**  
**Call Sign KNKN314**  
**RSA Iowa 11 - Hardin**  
**Cellular Renewal Application**  
**File No. 0000024976**  
**Public Interest Statement (Exhibit to FCC Form 601)**

**FCC Form 602 Ownership Disclosure**

Dear Sir/Madam:

Transmitted herewith, on behalf of NSP, L.C. ("NSP"), pursuant to 47 C.F.R. § 1.2112(a), is Federal Communications Commission ("FCC" or "Commission") Form 602. NSP's FCC Form 602 is being filed concurrently with its renewal application for the above-referenced station.

Although the Commission has stated that TIN and SSN information will not "be available to the public or Commission staff through ULS," NSP is nonetheless concerned about possible

---

*'In the Matter of Biennial Regulatory Review -Amendment of Parts 0, 1, 13, 22, 24, 26, 27, 80, 87, PO, 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).*

September 15, 1999

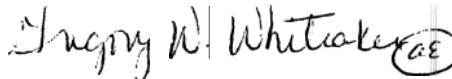
Page 2

disclosure of this highly sensitive information. Although the information contained in this FCC Form 602 will be manually scanned into the FCC's Universal Licensing System (ULS) database and the TIN and SSN information will therefore not be made available to the public via the ULS, NSP requests that the FCC take whatever action is necessary to ensure that the **TINs** and **SSNs** on the paper copy of the filing are not inadvertently made available to the public. NSP therefore requests that the unredacted paper copy not be placed in the station's public **file!**

Additionally, pursuant to 47 C.F.R. §22.107, please find enclosed for filing a copy of Exhibit 1 (Public Interest Statement) to NSP's FCC Renewal Application (FCC Form 601). We attempted to file the Public Interest Statement as an exhibit to and concurrently with NSP's FCC Form 601 via the ULS. However, we were unable to file an electronic copy of the Public Interest Statement as an attachment to the FCC Form 601 via the ULS due to system limitations. Upon contacting ULS Technical Support for assistance, we were told by Technical Support staff that the only way to file an attachment to a "renewal only" application via the ULS was to file the attachment as an amendment to the FCC Form 601. We made several **attempts** to file the Public Interest Statement as an amendment, but received a message at each attempt which stated, "You have no pending applications to amend."

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

Sincerely,

A handwritten signature in cursive script that reads "Gregory W. Whiteaker". To the right of the signature is a small circular stamp containing the initials "G.W."

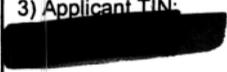
Gregory W. Whiteaker

Enclosures



FCC Ownership Disclosure Information for the Wireless Telecommunications Services

Applicant/Licensee Information

1) First Name (if individual):	MI:	Last Name:	Suffix:
2) Applicant Name (if entity): NSP, L.C.		3) Applicant TIN: 	

Related FCC Regulated Businesses of Applicant/Licensee

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

Signature

5) Typed or Printed Name of Party Authorized to Sign

First Name: <b>James</b>	MI: <b>L.</b>	Last Name: <b>Robertson</b>	Suffix:
-----------------------------	------------------	--------------------------------	---------

Title:  
President and Manager

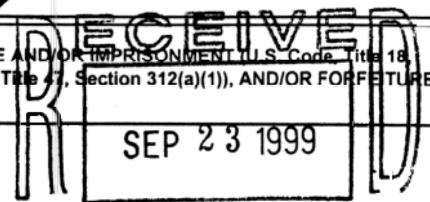
Signature: 

Date:  
9/7/99



Failure To Sign This Application May Result In Dismissal 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).



**FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services-  
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): James	MI: L.	Last Name: Robertson	suffix:
2) Disclosable Interest Holder's Name (if entity):		3) Disclosable Interest Holder's TIN: 	
4) Disclosable Interest Holder's Address: 211 Main Street, La Porte City, Iowa 50651			
5) Type of Interest in Applicant: ( I, O, K ) (refer to Instructions for list)	6) Disclosable Interest Holder is a(n): ( I ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 3.11%	
8) Disclosable Interest Holder's Type of Ownership (refer to Instructions for list):  0 - Voting		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):  Mr. Robertson is the President and a Manager of NSP, L.C. Mr. Robertson also holds an indirect interest in NSP, L.C. by virtue of his 22.22% interest in La Porte City Telephone Company which, in turn, holds a 14% interest in NSP, L.C.			

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

IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	IIb) Principal Business:	IIc) TIN:	II d) Percent of Interest Held:

**FCC Ownership Disclosure information for the  
Wireless Telecommunications Services  
Schedule for Disclosable Interest Holders**

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

1) Disclosable Interest Holders First Name (if individual): Donald	MI: S.	Last Name: Jennings	Suffix:
2) Disclosable Interest Holders Name (if entity):		3) Disclosable Interest Holder's TIN: <div style="background-color: black; width: 100px; height: 15px;"></div>	
4) Disclosable Interest Holder's Address: c/o Mid-Iowa Telephone Cooperative Association, 101 East Church Street, Gilman, Iowa 50106			
5) Type of Interest in Applicant: ( O, K ) (refer to Instructions for list)	6) Disclosable Interest Holder is a(n): ( 1 ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant:  None	
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):  0 - Voting		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):  Mr. Jennings is the Secretary and a Manager of NSP, L.C.			

**Related FCC Regulated Businesses of Disclosable Interest Holders** (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:

**FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services  
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 Holders Name (if entity): Radcliffe Telephone Company		3) Disclosable Interest Holder's TIN: 	
4) Disclosable Interest Holder's Address: 202 Isabella Street, P.O. Box 130, Radcliffe, Iowa 50230			
5) Type of Interest in Applicant: ( D ) (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:  14%	
8) Disclosable Interest Holders Type of Ownership (refer to instructions for list):  0 - Voting		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):  Radcliffe Telephone Company holds a 14% interest in NSP, L.C.			

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

IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	IIb) Principal Business:	11c) TIN:	II d) Percent of Interest Held:
Iowa RSA No. 10 General Partnership c/o AirTouch Communications One California Street, 10 <sup>th</sup> Floor, San Francisco, CA 94111	Cellular		10.185%

FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services

Schedule for Disclosable Interest Holders

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

1) Disclosable Interest Holders First Name (if individual): Richard	MI:	Last Name: Drake	suffix:
2) Disclosable Interest Holders Name (if entity):		3) Disclosable Interest Holder's TIN: 	
4) Disclosable Interest Holders Address: 202 Isabella Street, P.O. Box 130, Radcliffe, Iowa 50230			
5) Type of Interest in Applicant: ( 1 ) (refer to Instructions for list)	6) Disclosable Interest Holder is a(n): ( 1 ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant:  14%	
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):  0 - Voting		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):  Richard Drake is a 50% owner of Radcliffe Telephone Company which, in turn, holds a 14% interest in NSP, L.C.			

**Related FCC Regulated Businesses of Disclosable Interest Holders** (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:
			

FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services-  
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): Phyllis	MI:	Last Name: Drake	suffix:
2) Disclosable Interest Holders Name (if entity):		3) Disclosable Interest Holder's TIN: 	
4) Disclosable Interest Holder's Address: 202 Isabella Street, P.O. Box 130, Radcliffe, Iowa 50230			
5) Type of Interest in Applicant: ( 1 ) (refer to Instructions for list)	6) Disclosable Interest Holder is a(n): ( 1 ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 14%	
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): 0 - Voting		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): Phyllis Drake is a 50% owner of Radcliffe Telephone Company which, in turn, holds a 14% interest in NSP, L.C.			

**Related FCC Regulated Businesses of Disclosable Interest Holders** (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:

FCC Ownership Disclosure Information for the  
**Wireless Telecommunications Services**

**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 Holders Name (if entity): La Porte City Telephone Company			3) Disclosable Interest Holder's TIN: [REDACTED]
4) Disclosable Interest Holder's Address: 306 Main Street, La Porte City, Iowa 50651			
5) Type of Interest in Applicant: ( D ) (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:  14%
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):  0 - Voting		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):  La Porte City Telephone Company holds a 14% interest in NSP, L.C.			

**Related FCC Regulated Businesses of Disclosable Interest Holders** (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:
Alpine Communications, L.C. (parent company) 11260 Aurora Ave. Bldg. 6, Des Moines, IA 50322	LMDS	[REDACTED]	22.22%
Alpine Long Distance, L.C. 11260 Aurora Ave. Bldg. 6, Des Moines, IA 50322	Long Distance Service	[REDACTED]	22.22% indirect Interest through Alpine Comm.
Alpine Cable, L.C. 11260 Aurora Ave. Bldg. 6, Des Moines, IA 50322	Cable Television	[REDACTED]	22.22% indirect interest through Alpine Comm.
Alpine Network Service 11260 Aurora Ave. Bldg. 6, Des Moines, IA 50322	CLEC	[REDACTED]	22.22% indirect interest through Alpine Comm.
Iowa RSA # 12 LLC P.O. Box 19079, Green Bay, WI 54307	Cellular	[REDACTED]	10%

**FCC Ownership Disclosure information for the  
Wireless Telecommunications Services**  
**Schedule for Disclosable interest Holders**

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

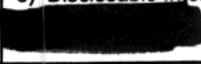
1) Disclosable Interest Holder's First Name (if individual):		MI:	Last Name:	suffix:
2) Disclosable interest Holder's Name (if entity): D-C Communications, inc.			3) Disclosable Interest Holder's TIN: 	
4) Disclosable Interest Holder's Address: c/o Farmers Cooperative Telephone Company, 332 Main Street, Dysart, Iowa 52224				
5) Type of Interest in Applicant ( D ) (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:  14%
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):  0 - Voting			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):  D-C Communications, Inc. holds a 14% interest in NSP, L.C.				

**Related FCC Regulated Businesses of Disclosable interest Holders** (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:

**FCC Ownership Disclosure information for the  
Wireless Telecommunications Services-  
Schedule for Disclosable Interest Holders**

**Disclosable interest Holder information** (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holders First Name (if individual):		MI: Last Name:	suffix:
		- r	
2) Disclosable Interest Holders Name (if entity): Farmers Cooperative Telephone Company		3) Disclosable Interest Holders TIN: 	
4) Disclosable Interest Holder's Address: 332 Main Street, Dysart, Iowa 52224			
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:  14%	
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):  0 - Voting		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):  Farmers Cooperative Telephone Company, wholly owns D-C Communications, inc. which, in turn, holds a 14% interest in NSP, L.C.			

**Related FCC Regulated Businesses of Disclosable interest Holders** (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:

FCC Ownership Disclosure information for the  
Wireless Telecommunications Services

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 Holders Name (if entity): Heart of Iowa Communications, inc.			3) Disclosable Interest Holder's TIN: 	
4) Disclosable Interest Holder's Address: c/o Heart of Iowa Telecommunications Cooperative, Center & Main Streets, P.O. Drawer E, Union, Iowa 50258				
5) Type of Interest in Applicant ( D ) (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: 14%	
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): 0 - Voting			9) Disclosable interest Holder's Country of Citizenship: U.S.	
10) Relationship Description (if the discloseable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): Heart of Iowa Communications, inc. holds a 14% interest in NSP, L.C.				

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

IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	IIb) Principal Business:	11c) TIN:	II d) Percent of Interest Held:

**FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services**  
**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): Heart of Iowa Telecommunications Cooperative		3) Disclosable Interest Holder's TIN: 	
4) Disclosable Interest Holders Address: Center & Main Streets, P.O. Drawer E, Union, Iowa 50258			
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: 14%	
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): 0 - Voting		9) Disclosable Interest Holder's Country of Citizenship: U.S.	
10) Relationship Description (if the discloseable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): Heart of Iowa Telecommunications Cooperative wholly owns Heart of Iowa Communications, Inc. which, in turn, holds a 14% interest in NSP, L.C.			

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

IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	IIb) Principal Business:	IIc) TIN:	II d) Percent of Interest Held:

**FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services  
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): Mid-Iowa Communications, Inc.		3) Disclosable Interest Holder's TIN: 	
4) Disclosable Interest Holder's Address: c/o Mid-Iowa Telephone Cooperative Association, 101 E. Church Street, P.O. Box 8, Gilman, Iowa 50106			
5) Type of Interest in Applicant ( D ) (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:  14%	
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):  0 - Voting		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):  Mid-Iowa Communications, Inc. holds a 14% interest in NSP, L.C.			

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

IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	IIb) Principal Business:	IIc) TIN:	II d) Percent of Interest Held:

FCC Ownership Disclosure information for the  
Wireless Telecommunications Services

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): Mid-Iowa Telephone Cooperative Association			3) Disclosable Interest Holder's TIN: [REDACTED]	
4) Disclosable Interest Holder's Address: 101 E. Church Street, P.O. Box 8, Gilman, Iowa 50106				
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:  14%
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):  0 - Voting			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):  Mid-Iowa Telephone Cooperative Communications, Inc. wholly owns Mid-Iowa Communications, Inc. which, in turn, holds a 14% interest in NSP, L.C.				

Related FCC Regulated Businesses of Disclosable Interest Holders (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:
Mid-Iowa Long Distance, Inc. 101 E. Church St., P.O. Box 8, Gilman, Iowa 50106	Long Distance	[REDACTED]	100%

FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services

Schedule for Disclosable Interest Holders

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

1) Disclosable Interest Holders First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Iowa Network Services, Inc.		3) Disclosable Interest Holders TIN: [REDACTED]	
4) Disclosable Interest Holders Address: 4201 Corporate Drive, West Des Moines, Iowa 502665906			
5) Type of Interest in Applicant ( D ) (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: 10%	
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): 0 - Voting		9) Disclosable Interest Holder's Country of Citizenship: U.S.	
10) Relationship Description (if the discloseable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): Iowa Network Services, Inc. holds a 10% interest in NSP, L.C.			

**Related FCC Regulated Businesses of Disclosable Interest Holders** (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:
Iowa Wireless Services, L.P. 11358 Aurora Ave., Urbandale, IA 50322	PCS	[REDACTED]	62%

FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services

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 Holders Name (if entity): Northeast Communications of Wisconsin, Inc.		3) Disclosable Interest Holder's TIN:	
4) Disclosable Interest Holder's Address: P.O. Box 19079, Green Bay, WI 54307-9079			
5) Type of Interest in Applicant ( D ) (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: 20%	
6) Disclosable Interest Holders Type of Ownership (refer to instructions for list): 0 - Voting		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): Northeast Communications of Wisconsin, Inc. holds a 20% interest in NSP, L.C.			

Related FCC Regulated Businesses of Disclosable Interest Holders (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:
Brown County MSA Cellular Limited Partnership P.O. Box 19079 Green Bay, WI 54307-9079	Cellular	[REDACTED]	1% as G.P. 99% as L.P.
Iowa RSA # 12 LLC P.O. Box 19079 Green Bay, WI 54307-9079	Cellular	[REDACTED]	90%
Iowa RSA # 3 LLC P.O. Box 19079 Green Bay, WI 54307-9079	Cellular	[REDACTED]	54.835%
Metro Southwest PCS LLC P.O. Box 19079 Green Bay, WI 54307-9079	PCS	[REDACTED]	43.74999%
NET Cable P.O. Box 19079 Green Bay, WI 54307-9079	Cable TV	[REDACTED]	100%
Northeast Tel. Long-Distance Co. P.O. Box 19079 Green Bay, WI 54307-9079	Interexchange	[REDACTED]	100%

FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services  
Schedule for Disclosable Interest Holders

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

1) Disclosable Interest Holders First Name (if individual):		MI:	Last Name:	suffix:
2) Disclosable Interest Holders Name (if entity): Northeast Communications of Wisconsin, Inc.			3) Disclosable Interest Holders TIN: [REDACTED]	
4) Disclosable Interest Holders Address: P.O. Box 19079, Green Bay, WI 54307-9079				
5) Type of Interest in Applicant ( D ) (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: <b>20%</b>
6) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): <b>0 - Voting</b>			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 <b>ownership from</b> indirect owner to the applicant): Northeast Communications of Wisconsin, Inc. holds a 20% interest in NSP, L.C.				

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

IIa) 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:	II d) Percent of Interest Held:
Northeast Telephone Company P.O. Box 19079 Green Bay, WI 54307-9079	LEC	[REDACTED]	100%
Wisconsin RSA-10 Limited Partnership P O Box 19079 Green Bay, WI 54307-9079	Cellular	[REDACTED]	64.7% of GP 54.353% as LP
Wisconsin RSA No. 4 Limited Partnership P.O. Box 19079 Green Bay, WI 54307-9079	Cellular	[REDACTED]	25% of GP 24.46645% as LP
Wausau Cellular Tel. Co. Limited Partnership P.O. Box 19079 Green Bay, WI 54307-9079	Cellular	[REDACTED]	40% as GP 32.48485% as LP
		[REDACTED]	
		[REDACTED]	

ORIGINAL

NSP, L.C.  
FCC Form 601  
Exhibit 1  
Page 1 of 3



**Public Interest Statement and Licensee Qualifications**  
(47 C.F.R. § 22.107)

By this application, NSP, L.C. ("NSP"), a limited liability company organized under Iowa law, seeks renewal of its cellular radio license for Station **KNKN3** 14 operating on the Block B frequencies in Rural Service Area (RSA) Iowa 11 - **Hardin**. The Commission has previously found NSP to be legally, technically and financially qualified to be a Commission licensee. The information and certification provided in connection with this Exhibit to FCC Form 601 and on file with the Commission in the Station file for **KNKN3** 14 demonstrate **NSP's** qualifications to remain a Commission licensee.

The Commission has found the provision of cellular service to serve the public interest.<sup>1</sup> Over the course of its license term, NSP has responded to demand for cellular service in the **Hardin** RSA by expanding its system and making available to the public a variety of both basic and enhanced services, including nationwide automatic call delivery, to accommodate the needs of subscribers and roamers within its market. NSP has also made substantial investments in its cellular system in order to enhance the quality of service it provides the public. During the course of the license term, 17 cell sites have been constructed to provide analog coverage and other modifications have been made to **NSP's** system to meet the changing demand for service in the market. Moreover, NSP plans to offer digital coverage in the next few years. NSP will add an additional cell site by the end of 1999 and at least one additional cell site in 2000 to meet the increase in demand for cellular service. NSP currently serves the populated portion of **Hardin**, **Grundy**, **Marshall**, **Tama** and **Benton** counties (approximate population 109,247) with a network consisting of 17 cell sites, providing hand held coverage to approximately 75% of the geographic area of the RSA.

NSP has continued to implement modifications to its system to provide services through its cellular switch to ensure integration and interoperability between the NSP cellular system and adjacent markets.<sup>2</sup> NSP maintains switch-to-switch interconnection with other carriers throughout the state and in Wisconsin, with SS7 interconnection being used with all but one of those carriers. NSP has also negotiated and finalized an interconnection agreement with US West and GTE for the state of Iowa under the Telecommunications Act of 1996.

---

<sup>1</sup> See generally *Cellular Communication Systems (Cellular Systems)*, 86 F.C.C.2d 469 (1981), modified, 89 F.C.C.2d 58 (1982), further modified, 90 F.C.C.2d 571 (1982), appeal dismissed sub nom. *United States v. FCC.*, No. 82-1 526 (D.C. Cir. 1983).

<sup>2</sup> See *Second Renewal Order*, 8 FCC Rcd 2834, 2836 (1993) (subsequent history omitted)

**NSP, L.C.**  
**FCC Form 601**  
**Exhibit 1**  
**Page 2 of 3**

NSP has continued to implement new technologies. NSP was one of the first small cellular systems in Iowa to deploy the SS7 system. NSP has continued to upgrade its switch software with the newest features and hopes to offer 100% digital dual-mode voice channels when NSP deploys digital coverage to provide its subscribers the highest quality cellular communications.

To proactively deter fraud, NSP deployed "Fraud Manager", a GTE-TSI authentication product and is scheduled to deploy an upgraded authentication system, "A-Key"/"Over the Air", in 2000. As a result of the "Fraud Manager" deployment, the impact of fraud on consumers has been negligible. NSP is scheduled to implement Calling Line ID in 2000. Additionally, NSP is scheduled to deploy group ringing/simultaneous multiple phone ringing that is software-driven in the switch so that families and businesses can stay in touch with one another in early 2000.

NSP strives to provide the finest quality cellular services at the most affordable price. NSP's rates are one of the lowest in its market, with inexpensive plans to meet the varying needs of wireless users. NSP also plans to offer incremental billing in 2000. Through carrier-to-carrier agreements, NSP has been able to reduce roaming charges by 2530% over the last several years and, with additional upgrades, will reduce roaming charges in the next year. NSP's goal is to significantly reduce roaming charges for all calls within Iowa as well as many surrounding states, insofar as its agreements with other carriers permit.

Moreover, NSP has provided vital assistance to the community. NSP assists law enforcement efforts through the provision of a free phone to the Marshall County Sheriff's Office Drug Task Force and by donating phones and service for Benton County Sheriff's Office's fundraising efforts. NSP donates airtime each month to the Marshall County Office of Veterans Affairs to be used while transporting veterans to and from Des Moines and Iowa City hospitals. Additionally, NSP provides free phones and air time to local activities of community service organizations such as the Marshalltown YMCA/YWCA Youth Formation Group, the Muscular Dystrophy Association, and the Hardin County Boy Scout Summer Camp. NSP supports local schools by donating phones and airtime for fundraising and educational purposes. NSP donates phones and airtime each year to the Benton County Fair Board and to the Marshall County Cropwalk fundraiser. In addition to these donations of goods and services, NSP makes cash donations to local charities and organizations, including the Lioness Club and the Marshall County Department of Human Services Annual Food Drive. NSP has become an integral part of the community to which it provides service and has strived to be a good Commission licensee.

Commission grant of the instant application will allow NSP to continue to provide reliable cellular service to its subscribers and roamers and ensure uninterrupted service to the

**NSP, L.C.**  
**FCC Form 601**  
**Exhibit 1**  
**Page 3 of 3**

public. The Commission has determined that it is in the public interest to ensure the continuity of cellular service and to avoid the replacement of an acceptable provider with a potentially inferior one.<sup>3</sup>

---

<sup>3</sup> *Amendment of Part 22 Relating to License Renewals*, 7 FCC Rcd 719, 719-20 (1991), modified on other grounds, 8 FCC Rcd 2934 (1994), further modified, MO&O on further recon., 9 FCC Rcd 4487 (1994). See also *Cowles Broadcasting, Inc.*, 86 FCC Rcd 2d 993, 1013 (1981), *aff'd sub. nom Central Florida Enterprises, Inc. v. FCC*, 683 F. 2d 503 (D.C. Cir. 1982), *cert. denied*, 460 U.S. 1084 (1983).