

**ATTACHMENT FOR RENEWAL OF CALL SIGN WPJC617**

Pursuant to Sections 1.949 and 101.17 of the rules of the Federal Communications Commission (“FCC” or “Commission”), this attachment provides information to support the renewal of call sign WPJC617 licensed to Winstar Wireless Fiber Corp., a wholly-owned subsidiary of Winstar Communications, Inc. (Nasdaq: WCII) (collectively “Winstar” or “the Company”).

Winstar is the largest holder of broadband fixed wireless spectrum (39 GHz and 28/31 GHz) in the United States. Since 1993, Winstar (1) has been pioneering the development and commercialization of wireless broadband technologies, including point-to-multipoint technology, (2) has constructed a nationwide broadband network, and (3) has become the leading provider of fixed wireless broadband services in the country. In addition, Winstar has successfully deployed fixed wireless broadband networks in Europe, Asia, and Latin America. In total, Winstar now serves more than 70 markets around the world, more than 30,000 customers, and employs over 4,700 people worldwide. Since commencing its fixed wireless operations in late 1994, Winstar has raised more than \$5 billion through public and non-public debt and equity financing transactions. During that time, Winstar has spent more than \$3.2 billion on capital expenditures in connection with the buildout of its broadband network, 95 percent of which has been spent domestically.

In the United States, Winstar has concentrated on building a national broadband network, consisting of wireless and wireline facilities to provide competitive telecommunications services to consumers, including large, small and medium-sized businesses. As of September 2000, Winstar (1) had deployed more than 3,000 fixed wireless links, including facilities in Columbia (S.C.) under call sign WPJC617, (2) had constructed over 200 operational hub sites to support its wireless facilities, and (3) had secured access rights to more than 13,000 buildings throughout the country. Winstar’s fixed wireless links are enhanced by Winstar’s development of a wireline broadband network, including the deployment of over 35 voice switches and 135 data switches, the acquisition of 16,000 route miles of long-haul capacity and nearly 6,000 route miles of intracity fiber networks in the top 50 U.S. markets (portions of the network are under construction currently). While Winstar is technology agnostic in the methods it is willing to use in reaching its customers, the Company uses its fixed wireless spectrum holdings as its preferred method to connect to its end users. As Winstar installs these facilities in its markets and demand for traffic on those facilities increases, the wireless links are integrated with Winstar’s end-to-end fiber network. Winstar also has a national Tier 1 Internet backbone and operates a national network of regionally dispersed, state-of-the-art data centers.

In addition to creating one of the world's largest and most advanced facilities-based broadband networks, Winstar has made its network useful to businesses by creating and providing a comprehensive set of high-quality, digital-age broadband services. These services include high-speed Internet and data, Web hosting and design, enhanced voice services, Web-based applications, e-commerce, professional services and Office.com®, A Service From Winstar (“Office.com”), the top-ranked online business service for small and medium-sized businesses.

Winstar continues to rapidly expand its facilities-based broadband network. In fact, Winstar supplemented its existing wireless holdings this past year by winning 931 39 GHz licenses in the FCC’s auction. The facilities and license Winstar seeks to renew in Columbia (S.C.) are

important for Winstar's nationwide wireless coverage. Coverage in this market is essential for Winstar to market its services to customers seeking a national network with a facilities-based presence in Columbia (S.C.). Likewise, Winstar's investment in its entire network, including its wireline facilities and advanced services, is significant for this license as Winstar is able to offer those services and nationwide connectivity to customers in Columbia (S.C.).

Given the large investment Winstar has made in its national network and the facilities it has constructed in Columbia (S.C.), Winstar believes that it has demonstrated substantial service in this market. Therefore, Winstar respectfully requests that the Commission issue a renewal of the license.

## **DESCRIPTION OF WINSTAR AND ITS BROADBAND NETWORK**

Winstar has raised and invested significant capital to construct and operate an end-to-end, facilities-based broadband network. At the centerpiece of this network are Winstar's fixed wireless licenses in the 39 GHz band. To assist the Commission in understanding Winstar's network and financial commitment to maximize its spectrum resources, Winstar provides the following description.

### **1. FINANCIAL OVERVIEW**

For the period January 1, 2000, through September 30, 2000, Winstar's broadband services revenues were \$462.2 million. For 1999, annual revenues were \$445.6 million, compared to \$244.4 million for 1998. The Company has delivered double-digit percentage increases in broadband services revenue for 14 consecutive quarters, and the Company anticipates that it will turn EBITDA positive during the second quarter of 2001.

In November 2000, Winstar completed a \$1.02 billion financing package, composed of \$270 million in private equity from Microsoft, Compaq, CSFB, and Welsh Carson, additional vendor financing from Compaq and Cisco and the expansion of its Senior Credit Facility. (Microsoft and several leading financial firms had previously agreed to provide Winstar with \$900 million in financing in December 1999.) This financing complements the strategic financing completed earlier in 2000 by Winstar, which raised \$1.6 billion of high yield debt and established a \$1.15 billion Senior Credit Facility. In conjunction with the earlier financing, the Company put in place a \$2 billion vendor finance facility with Lucent Technologies, of which \$1 billion is available at any one time.

### **2. THE WINSTAR NETWORK**

**CONNECTING THE LAST MILE.** Local communications service historically has been carried by incumbent local providers over their legacy networks. The portion of these legacy networks that ultimately connects to customer buildings, called the "last mile," is typically copper wire. Without enhancements, copper wire is poorly suited to support high-bandwidth services. The rapid growth of bandwidth-intensive communications services, such as Internet access, data transport, audio and video streaming and e-commerce applications, has created an increasingly acute shortage of transmission capacity across the last mile.

Winstar believes its fixed wireless infrastructure provides an optimal solution for delivering broadband capacity across the last mile. In contrast to fiber, the majority of the cost associated with establishing fixed wireless connections is related to technology and equipment, the cost of which has tended to decrease over time as the technology develops and becomes more widely used. As such, Winstar is able to connect customer buildings at a cost that is substantially less than that incurred in a fiber-build strategy.

Winstar's typical wireless customer is serviced by placing a 12 to 18 inch digital microwave antenna on the roof of the customer's building. The customer's voice, data and video communications traffic travel from the customer's premises over the building's internal wiring to this rooftop antenna. The traffic is then routed via wireless transmission to another antenna located on a nearby hub site building which has a direct line of site to the antenna on the customer's building.

Hub sites serve as aggregation points for the reception and distribution of Winstar's customers' traffic. Hub sites are located to maximize the number of potential buildings from which such sites can receive and distribute this communications traffic. Winstar's more than 200 hub sites typically are located on intracity fiber rings, allowing traffic received there to continue on at broadband speeds to its switching centers where it is routed to its final destination.

Winstar's 39 GHz and 28/31 GHz broadband fixed wireless spectrum covers virtually the entire U.S. While Winstar generally is technology agnostic, the Company primarily uses its spectrum to extend its broadband network across the "last mile" to its customers' buildings. (Winstar also holds hundreds of other FCC licenses, primarily in the 6 GHz, 10 GHz, 18 GHz, and 23 GHz bands.) Winstar currently can provide customers with up to OC-3 of transmission capacity, which is more than 2000 voice grade equivalents, over a single wireless link. The capacity of these wireless links has risen dramatically in recent years, and Winstar expects that it will continue to expand as wireless technology advances. The company presently is testing an OC-6 capacity radio in its state-of-the-art Integration Laboratory in Herndon, Virginia.

Winstar deploys point-to-point and point-to-multipoint connections in its local network infrastructure. Point-to-point connections use a single dedicated link between two antennas having line of site to each other, one located on the customer's building and one at a hub site. Point-to-multipoint technology allows for simultaneous transmissions between a single hub site antenna and multiple customer building antennas to which it has line of sight. It allows for the cost of the hub site antenna to be allocated over numerous customer building sites, which reduces the costs necessary to bring broadband services to a particular customer building. Moreover, the use of point-to-multipoint technology gives Winstar the unique ability to allocate and share network capacity on an as-needed basis and, over time, to supply customers with bandwidth-on-demand, which allows users to receive a wide array of services – ranging from voice and video conferencing to high-speed data and Internet – on a "pay-per-use" basis. Winstar's commercial deployment of point-to-multipoint technology is the culmination of a four-year research and development collaboration with leading equipment providers such as Siemens, Hughes Network Systems, and P-Com, among others, to design, develop, and manufacture the technology. Winstar has deployed point-to-multipoint technology in a number of markets, including Washington, D.C., Phoenix, Oakland, San Jose, Seattle and Salt Lake City.

**WINSTAR'S END-TO-END NETWORK ARCHITECTURE.** In addition to its wireless links, Winstar's local network infrastructure includes more than 6,000 delivered or committed route miles of local fiber rings constructed by Metromedia Fiber Networks ("MFN") that connect hub sites and the Company's voice and data switching facilities in 50 of the top 60 domestic markets. Route miles are delivered to Winstar on an ongoing basis as they are constructed by MFN. Winstar's 60 local networks then are interconnected by a four-fiber strand, 16,000 route-mile long-haul national fiber backbone constructed by Williams Communications and MFN. (Portions of the network remain under construction by Williams.) If Winstar requires more long-haul capacity, it has the option to purchase from Williams two additional fiber strands over the same routes. Winstar's network supports ATM, frame relay and IP data services, as well as switched voice services. As part of its strategic partnership with Winstar, Lucent is providing technology, network design, integration and build-out services as well as communications hardware and software in support of Winstar's global end-to-end broadband network.

**SWITCHING AND DATA CENTERS.** Winstar has installed over 35 Lucent local and long distance voice switches. The switches generally serve the markets in which they reside and, in some cases, secondary markets from which traffic is routed back to the switch. In addition, Winstar has over 135 data switches. Currently, Winstar's network configuration contains both regional and local data centers around the world. Winstar has seven regional data centers in operation in Washington, D.C., Boston, Minneapolis, San Francisco, Seattle, Buenos Aires and Brussels. Collectively, these data centers house more than 100,000 facilitated square feet of capacity. Winstar supplements these regional data centers with local hosting centers, which will be located in every central office domestically and in its data points of presence internationally.

As a Tier 1 backbone ISP, Winstar has entered into peering agreements with other Internet backbone providers for the efficient exchange of Internet traffic between networks, or on a private basis. Winstar accesses the Internet at all of the public peering points, such as MAE-east and MAE-west, and maintains private peering relationships with industry leaders, such as Cable & Wireless, Sprint, America Online, AT&T and more than 110 other providers.

**BUILDING ACCESS RIGHTS.** In order to connect a customer building to its network, Winstar must first obtain access rights from the building owner or manager to allow it to install antennas and access the communications closet(s) and the internal building wiring. Winstar has a dedicated team of more than 300 employees who exclusively focus on acquiring building access rights. Winstar acquires access rights on a building-by-building basis and through agreements with owners of portfolios of buildings. To date, it has signed agreements with a number of building portfolio owners, such as Equity Office Properties, Highwood Properties, Pacific Gulf, Spieker Properties, Tishman Speyer Properties, Blackstone Group, Jones Lang LaSalle and Cofinimmo SA, in Belgium.

During the third quarter of 2000, Winstar added approximately 1,700 new building access rights, bringing its cumulative total to over 13,100 buildings worldwide, which Winstar believes provides the Company with access rights to more buildings than any other facilities-based competitive communications provider. This total includes 400 hub sites, more than 200 of which are now operational, up from 111 the year before. Winstar also increased its total number of on-net buildings (those directly connected to its broadband network by wireless links or fiber) by 1,000 buildings to a cumulative total of 3,400. As a result, the company's "addressable

businesses” (businesses located in on-net buildings, where it can provide its full suite of product offerings) grew 43%, to 95,000, during the quarter.

**CUSTOMER TRAFFIC ON THE NETWORK.** Winstar added a total of 110,000 customer lines during the third quarter of 2000, bringing cumulative installed lines to 920,000. Of the 110,000 new lines added in that period, over 82% were fully on-network, versus 48% a year before. Winstar has raised its cumulative on-net percentage to an industry-leading 47% from 15%.

**NETWORK AND CUSTOMER SUPPORT.** Winstar uses customer-centric business and operations support systems that allow it to track orders, provisioning, billing and servicing for each customer from a central database. Its local broadband networks are monitored 24 hours a day, seven days a week through its network operations centers, or NOCs, located in Herndon, Virginia and Seattle, Washington. These NOCs provide Winstar with points of contact for network monitoring, troubleshooting and dispatching repair personnel in each market. They have a wide range of network surveillance functions for each local broadband network, including the ability to remotely receive data regarding the diagnostics, status and performance of the networks. The Company also maintains a separate NOC in Tysons Corner, Virginia that performs special monitoring functions and serves as a back-up to the primary NOCs.

Winstar provides customers with live 24-hour access to its national customer satisfaction center in Dublin, Ohio. Winstar has developed customer-centric support systems that provide its sales and service personnel with access from a single platform to in-depth information regarding customers' ordering and service requirements.

**WINSTAR INTERNATIONAL.** The rapidly growing demand for high-speed communications capabilities is a global phenomenon. Winstar plans to acquire spectrum, build fixed wireless local networks and sell communications services in 50 overseas markets located primarily in Europe, Asia and Latin America by the end of 2004. Of the 26 foreign markets in which Winstar has obtained spectrum rights or preferences, it is currently selling services in 13 markets, initially through the deployment of data switches and fixed wireless links:

<b>Europe</b>		<b>Asia**</b>	<b>Latin America</b>
Amsterdam*	Manchester	Tokyo*	Buenos Aires*
Rotterdam*	Leeds	Osaka*	Lima / Callao
The Hague*	Cologne*	Nagoya*	
Utrecht*	Dusseldorf	Okinawa*	
Brussels*	Essen	Sapporo	
Ghent	Frankfurt	Kyoto	
Antwerp	Hamburg		
Birmingham	Berlin		
London*	Paris*		

\* These markets are in operation

\*\* These markets are served by KDD Winstar, a joint venture formed by Winstar, KDD Corporation and Sumitomo Corporation, in which the Company owns a 35% interest.

### 3. WINSTAR'S SERVICES

Winstar's broadband network allows it to offer an integrated suite of communications and information services, including: local and long distance voice services; always-on and dial-up Internet access; ATM, frame relay and IP data transport services; web hosting and web design and development services; online business content, including Office.com; online application hosting services, including Microsoft Office 2000 Online<sup>SM</sup>; network and applications solutions for vertical business communities; and LAN and WAN systems integration.

**VOICE.** Winstar's broadband network and high-speed digital switches allow it to provide a variety of voice services including: local, regional toll and long distance services; Centrex and dedicated lines; 800/calling card services; and enhanced features, including call waiting, call forwarding, and voice mail, as well as operator and directory assistance services.

**INTERNET AND DATA TRANSPORT.** In addition to providing ATM, frame relay, virtual private network, IP and data transport services, Winstar offers customers high-speed, always-on or dial-up Internet access. A substantial majority of its Internet and data traffic travels on its Tier 1 backbone. Winstar also provides service to more than 200 ISP customers who, in total, serve more than one million end users. In addition to its ISP customers, Winstar provides Internet service to businesses, government and educational institutions, cable television operators and value-added resellers.

**WEB DESIGN AND HOSTING.** Winstar provides its customers with a full range of web hosting and design services, including shared, dedicated, collocated and fully managed web hosting. These services are provided using its regional and local data centers, which are located on its Internet backbone.

**ON-LINE BUSINESS CONTENT AND APPLICATIONS.** To capitalize on the increasing demand among business customers for business content, Winstar creates business content and applications for delivery through its broadband network. These efforts resulted in the launch of Office.com, Winstar's online business center. Office.com is a destination site that enables users to interact, communicate and transact business with customers, colleagues, and suppliers. Users also have access to extensive business information and content in more than 150 industry categories, as well as e-commerce and communications tools and services. The Office.com family of sites includes AtYourOffice.com, an office products site, and Individual.com, which provides free, individually customized news briefings. Office.com was recently rated as the highest ranked SMB portal by Fortune Small Business magazine. Previously, Cahners In-Stat named Office.com the number-one overall Online Business Center. Office.com recently announced that its consolidated traffic in December 2000 increased to over 3 million unique visitors, according to Media Metrix. The site ranks among the top 10 business to business web sites.

CBS owns 33 1/3% of Office.com. In exchange for its equity position, CBS is providing Office.com with approximately \$47.5 million of promotions and advertising over a term of six years across the full range of CBS' media properties, as well as those of its subsidiaries, including Infinity Broadcasting Corporation.

**APPLICATION SERVICE PROVIDER (“ASP”).** An ASP is a service provider that hosts software applications on servers located in its data centers and deploys these applications across a network to a customer base. Winstar’s ASP services provide business customers with outsourced access to applications on a subscription basis. These applications are hosted at its data centers and are delivered to customers using its broadband network.

Winstar has entered into a multifaceted relationship with Microsoft to develop a market presence in the ASP market. Winstar is one of the few domestic local telecommunications provider selected by Microsoft for the hosting and delivery of all Microsoft applications, including Microsoft Office 2000 Online. Winstar also has agreed with Microsoft to co-develop new bandwidth-intensive services, such as on-demand IP video conferencing, and to collaborate on Microsoft's BizTalk e-commerce and media streaming initiatives.

Winstar has expanded its ASP offerings to include database applications from Oracle and e-business applications from Great Plains Solutions. Winstar also has supplemented its ASP offerings to include financial services applications from Bridge and services from Cyntergy, a hospitality industry application provider. In mid 2000, Winstar penetrated the higher education vertical by entering into a contract to host Oracle applications for human resources, financial aid, accounting, and student and employee record-keeping for a major public university.

**VERTICAL SOLUTIONS.** The limitations of the existing public infrastructure often prevent businesses from effectively collaborating and sharing work flow with their industry partners. Winstar has begun to offer solutions for specific industries, such as the entertainment, publishing and education industries, where participants require the transport of data-intensive work product to their industry partners. Winstar works with strategic partners to integrate software, standardize information exchange protocols and broadband access, network security and accountability to create a virtual community in which industry partners can collaborate online. In connection with these efforts, Winstar entered into an agreement with Wam!Net, a global digital data management services company that helps customers leverage the Internet to convert their analog workflow to digital workflow.

Winstar also provides LAN and WAN systems integration and other similar services as part of its strategy to provide a full suite of complementary data services. It can provide expert support in areas such as network infrastructure design, implementation, network and desktop operating systems, web-site design and management, document management systems, groupware applications, Internet and Intranet solutions, flexible support of LAN, WAN and public networks and sourcing and procurement of equipment. Winstar has developed numerous strategic relationships with prominent technology providers, such as Microsoft, Cisco, Compaq, Novell, PC DOCS, Lotus and Bay Networks.

#### 4. ADVERTISING AND SALES

**ADVERTISING.** Winstar and Office.com have engaged in a number of regional and national television and print advertising campaigns. In addition, in August 2000, Winstar announced the launch of the Winstar Airship as part of its "Frictionless Business" marketing campaign, which includes brand-building efforts for Office.com. Featuring the logos of Winstar and Office.com, the Winstar Airship is scheduled for a year-long, nationwide promotional tour that included the

worldwide broadcast of the 2000 U.S. Open Tennis Championships for CBS and USA Networks as well as other, high-profile sporting and entertainment events. In addition to providing aerial television coverage of these events, Winstar will systematically utilize the Winstar Airship in each of its key geographic markets for focused sales, marketing and media initiatives. After covering the U.S. Open, the Winstar Airship embarked on a flight itinerary, which includes Boston, Chicago, Dallas, San Francisco, Los Angeles, San Diego, Phoenix, Tucson and Las Vegas. A 24-man crew and six ground support vehicles trail the airship.

**SALES.** Winstar sells its communications services primarily through two direct sales forces, one focused on small- and medium-sized businesses and the other on large accounts. The Company also uses an independent agent channel to supplement its direct sales forces.

Winstar's sales organization that is dedicated to small- and medium-sized businesses includes more than 1000 sales and service professionals. Its sales people are trained to sell Winstar's services by focusing on the particular needs of the small- and medium-sized business customers. In October 2000, Winstar launched its Business Essentials marketing initiative for such businesses. Business Essentials features seven different flat-rate plans, all of which include "always-on" Internet access, unlimited local telephony services, and competitively priced long-distance services. Upgrade packages include other data services such as web hosting, web design, higher speed Internet connectivity, frame, ATM and IP services.

Winstar's Large Accounts sales force includes more than 280 sales and service professionals. Winstar sells to large accounts through a number of channels, including: sales of bundled products and services; direct sales to large, multi-location customers; focused sales efforts for vertical solutions; leverage of the Company's strategic relationships; and sales to government organizations. The Company has now signed contracts totaling over \$1.4 billion from its large account customers (exclusive of its government awards).

Through its Large Account group, Winstar has been awarded eleven government contracts by the General Service Administration's Federal Technology Service to provide services to federal Government users. These contract awards cover eleven cities: Atlanta, Cincinnati, Miami, St. Louis, Indianapolis, Minneapolis/St. Paul, Dallas/Ft. Worth, Denver, Los Angeles, Baltimore, and Boston. In total, Winstar has received Metropolitan Area Acquisition awards with a combined potential value of more than \$2.7 billion. Winstar is the first company other than a Regional Bell Operating Company or AT&T to win one of these contracts. Under the contracts, Winstar will provide data and local switched voice services, dedicated transmission services, and new technologies and services to government users. Eligible users include federal agencies, federal contractors and certain federally supported universities and laboratories.

## 5. WINSTAR'S COMMITMENT TO COMMUNITY SERVICE

Winstar for Education ("WFE") focuses on harnessing Winstar's telecommunications technology for educationally and socially significant interactive projects. WFE's projects include:

- The Virtual Wall ([www.thevirtualwall.org](http://www.thevirtualwall.org)). This Web-based replica of The Wall was developed by Winstar and the Vietnam Veterans Memorial Fund. The Virtual Wall has

received more than 30 million hits and over 18,000 remembrances. Teach Vietnam, a companion website ([www.teachvietnam.org](http://www.teachvietnam.org)) is an online educational resource and learning tool for students that examines the Vietnam War and its lasting impact on society.

- The Training Café ([www.trainingcafe.com](http://www.trainingcafe.com)). Macromedia and WFE have co-developed Training Café to provide free, online, interactive modules that introduce Internet technology to teachers.
- New York Board of Education. WFE provides wireless Internet services, professional technology training, and web curriculum integration assistance to five New York City Public high schools.
- LATTICE (Leveraging Advanced Telecommunications Technologies to Improve Community Environments). Using its fixed wireless technology, WFE provides broadband telecommunications services and Internet capabilities to several locations in a low-income community in Northeast Washington, DC.

### **RENEWAL OF CALL SIGN WPJC617**

Winstar is licensed for channel 11 in Columbia (S.C.) under call sign WPJC617. The license covers a population of approximately 775,000 over 4868 square miles around Columbia (S.C.). Specific coordinates can be obtained from the license. As shown herein, Winstar has demonstrated that it has provided substantial service in this market.

In Columbia (S.C.), Winstar has constructed and currently operates one (1) wireless link on channel 11. This market also is located in close proximity to Winstar's extensive fiber network.

Columbia (S.C.) has been incorporated into the Atlanta Branch of Winstar's South Division, to which Winstar has assigned full-time sales agents, building and engineering professionals to focus exclusively on the markets within this branch.

As set forth in greater detail above, Winstar has put in place the infrastructure, services, personnel, and systems necessary to support its services provided nationally as well as in Columbia (S.C.). To review, the Company has:

- Spent more than \$3.2 billion on capital expenditures in connection with the buildout of its broadband network.
- Hired over 4,700 employees to design, construct, operate, and market its wireless and wireline facilities, services, and products;
- Deployed over 3,000 fixed wireless links, constructed over 200 operational hub sites, and deployed over 35 voice switches and 135 data switches;
- Developed and deployed state-of-the-art point-to-multipoint equipment with Hughes Network Systems, P-Com and Siemens;
- Acquired 16,000 route miles of long-haul fiber and 6,000 route miles of intracity fiber networks throughout the U.S.;
- Built seven regional data centers, three network operation control centers, and a national customer satisfaction center;

- Established a significant Internet and e-business presence through the acquisition of networks and the development of key commercial products and service offerings, including Office.com, one of the leading business web sites; and
- Engaged in national marketing campaigns for Winstar services and products.

Winstar's investment in its entire network is vital for customers in Columbia (S.C.) as Winstar is able to offer nationwide connectivity and facilities-based services and products to customers in this market. By the same token, the licensed facilities Winstar seeks to renew in Columbia (S.C.) are important for Winstar's nationwide network as Winstar uses its wireless spectrum to provide "last mile" connectivity to reach customers quickly and efficiently and to compete effectively with other facilities-based providers, such as incumbent local exchange carriers.

Winstar has spent more than \$3.2 billion on capital expenditures in connection with the buildout of its global broadband network. Given the large investment Winstar has made in its national and international networks and the facilities it has constructed in Columbia (S.C.), Winstar believes that it has demonstrated substantial service in this market warranting renewal of its license.

Should the Commission have any questions concerning this exhibit or require additional information, please contact Joe Sandri or Barry Ohlson at 202-367-7600.