

**INFORMATION REGARDING OWNERSHIP AND
ELIGIBILITY FOR BIDDING CREDITS**

The applicant is Orion Wireless LLC (“Orion”), a State of Delaware Limited Liability Company.

The disclosable interest holders (i.e., direct and indirect holders of ten percent or more) of Orion are:

- (i) David G. Behenna Trust dated 5/11/90, a California trust, which holds a 100 percent member interest in Orion.
- (ii) PCSGP, Inc., a Delaware corporation, which is Orion’s Manager.
- (iii) David G. Behenna, a U.S. citizen, who is the grantor and trustee of the David G. Behenna Trust dated 5/11/90 and also is the President and 100 percent owner of PCSGP, Inc.

As a State of Delaware Limited Liability Company, Orion has no directors, and has no classes of stock, warrants, options or debt securities; it is a manager-managed limited liability company. The Orion Limited Liability Company Agreement gives the Manager full and complete authority over Orion’s conduct, operation, and management.

Laura D. Behenna, a U.S. citizen, is Mr. Behenna’s wife. As Mr. and Mrs. Behenna are individuals, their personal net worth and personal income are not attributable to the applicant, and the fields for their gross revenues for the applicable reporting periods in Form 175 have been shown as 0.

Pursuant to 47 C.F.R. 1.2112(b)(iii), Orion notes that its affiliate PCS Partners, L.P. is a party to a spectrum leasing agreement with New Cingular Wireless; however, that agreement is not for more than 25% of the subject spectrum and does not create an attributable material relationship under the Commission’s rules.

There are no other agreements that affect Orion’s ownership, control, or eligibility for bidding credits.