

**FCC FORM 175
FCC AUCTION 97
SAAS LICENSE, LLC
EXHIBIT A**

EXHIBIT A

APPLICANT IDENTITY AND OWNERSHIP INFORMATION

The information required under Sections 1.2105, 1.2110 and 1.2112 of the Commission's rules is set forth below.

1. General Information

The applicant is SAAS License, LLC ("SAAS License"), a limited liability company formed under the Delaware Limited Liability Company Act. The address of SAAS License is

1 Central Park West
No. 28A
New York, NY 10023

2. Ownership Information

A. Controlling Interests in the Applicant

The applicant is SAAS License, a limited liability company formed under the Delaware Limited Liability Company Act. SAAS License has no officers or directors. SAAS Holdings, LLC ("SAAS Holdings"), a limited liability company formed under the Delaware Limited Liability Company Act, holds 100 percent of all member interests in SAAS License and is its managing member. Pursuant to Section 1.2110(c)(2) of the Commission's rules, SAAS Holdings is the sole direct controlling interest in the applicant. SAAS Holdings has no officers or directors.

SAAS Holdings has one member: SAAS Management, LLC ("SAAS Management"), a limited liability company formed under the Delaware Limited Liability Company Act. SAAS Management is the sole manager of SAAS Holdings.

SAAS Management has two members who co-manage SAAS Management: Sanjiv Ahuja and Arun Sarin, who are both U.S. citizens. Messrs. Ahuja and Sarin each have a 50 percent direct interest in and control of SAAS Management, and thus each has a 50 percent indirect interest in and control of SAAS Holdings and SAAS License.

**FCC FORM 175
FCC AUCTION 97
SAAS LICENSE, LLC
EXHIBIT A**

The address and citizenship for SAAS License, SAAS Holdings, and SAAS Management are:

1 Central Park West
No. 28A
New York, NY 10023
Citizenship: U.S. (Delaware LLCs).

Mr. Ahuja's business address and citizenship are:

1 Central Park West
No. 28A
New York, NY 10023
Citizenship: U.S.

Mr. Sarin's business address and citizenship are:

6114 La Salle Ave, Suite 436
Oakland, CA 94611
Citizenship: U.S.

Accordingly, SAAS Holdings, SAAS Management and Messrs. Ahuja and Sarin have the sole and ultimate controlling interests in SAAS License under Section 1.2110(c)(2) of the Commission's rules.

B. Parties Holding 10 Percent or More of Applicant

The applicant is SAAS License. This entity has no officers or directors. SAAS Holdings holds 100 percent of all member interests in SAAS License and is the sole manager. Pursuant to Section 1.2110(c)(2), SAAS Holdings is the sole direct controlling interest holder in the applicant. The citizenship and address of SAAS Holdings is set forth above in Section 2A of this EXHIBIT A. SAAS License has no outstanding stock, warrants, options, or debt securities.

SAAS Holdings has one member: SAAS Management. SAAS Management has two members, Messrs. Ahuja and Sarin, who each own 50 percent of the member interests in SAAS Management and are its co-managers. Because both Mr. Ahuja and Mr. Sarin have controlling interests in SAAS Management, under the Commission's attribution criteria, they each are reportable as holding a 100 percent indirect interest in the applicant, SAAS License.

No other person or entity holds a 10 percent or greater indirect interest in SAAS License.

**FCC FORM 175
FCC AUCTION 97
SAAS LICENSE, LLC
EXHIBIT A**

3. FCC Regulated Entities of FCC License Applicants Holding 10 Percent or More of Which is Owned Directly or Indirectly by Controlling Interests or SAAS License

A. Applicant

SAAS License does not currently hold any FCC licenses and does not have any subsidiaries.

B. 10 Percent or Greater Holders/Controlling Interest Holders

SAAS Holdings does not own 10 percent or more of the stock, warrants, options, or debt securities of any FCC-regulated entity or any FCC license applicant.

SAAS Management does not own 10 percent or more of the stock, warrants, options, or debt securities of any FCC-regulated entity or any FCC license applicant.

Mr. Ahuja does not own 10 percent or more of the stock, warrants, options, or debt securities of any FCC-regulated entity or any FCC license applicant.

Mr. Sarin does not own 10 percent or more of the stock, warrants, options, or debt securities of any FCC-regulated entity or any FCC license applicant.

EXHIBIT B

STATUS AS A VERY SMALL BUSINESS

Sections 1.2110(f)(2)(ii) and 27.1106(b) Certifications and Disclosures

SAAS License, LLC (“SAAS License”) submits the following information to demonstrate that it is a very small business under Sections 1.2110(f)(2)(ii) and 27.1106 of the Commission’s rules. SAAS License, together with its affiliates, its controlling interests, the affiliates of its controlling interests, and the entities with which it has an attributable material relationship, has average annual gross revenues that are not more than \$15 million for the preceding three years. In support thereof, SAAS License sets forth the following information required under Sections 1.2110(b)(1)(i) and 1.2112(b)(1)(iv) of the Commission’s rules.

1. Applicant

The applicant is SAAS License, a limited liability company formed under the Delaware Limited Liability Company Act. SAAS License was formed on August 29, 2014. It had no gross revenues in any of the preceding three years:

2011 Gross Revenues	None
2012 Gross Revenues	None
2013 Gross Revenues	None
Average Gross Revenues for the Preceding 3 Years	None

2. Controlling Interests in the Applicant

As discussed in EXHIBIT A to this Form 175, direct and indirect controlling interests in SAAS License are held by SAAS Holdings, LLC (“SAAS Holdings”), SAAS Management, LLC (“SAAS Management”), Sanjiv Ahuja and Arun Sarin. Neither SAAS Holdings nor SAAS Management has any officers or directors. Messrs. Ahuja and Sarin are individuals.

SAAS Holdings is a limited liability company formed under the Delaware Limited Liability Company Act. SAAS Holdings was formed on August 29, 2014. It had no gross revenues in any of the preceding three years:

2011 Gross Revenues	None
2012 Gross Revenues	None
2013 Gross Revenues	None

**FCC FORM 175
FCC AUCTION 97
SAAS LICENSE, LLC
EXHIBIT B**

Average Gross Revenues for the None
Preceding 3 Years

SAAS Management is a limited liability company formed under the Delaware Limited Liability Company Act. SAAS Management was formed on August 29, 2014. It had no gross revenues in any of the preceding three years:

2011 Gross Revenues None
2012 Gross Revenues None
2013 Gross Revenues None

Average Gross Revenues for the None
Preceding 3 Years

Messrs. Ahuja and Sarin are individuals and their respective net worths and personal incomes are not attributable. *See, e.g.*, 47 C.F.R. § 1.2110(c)(2)(ii)(F).

3. Affiliates of Controlling Interests in the Applicant

As discussed in EXHIBIT A to this Form 175 and this EXHIBIT B, direct and indirect controlling interests in SAAS License are held by SAAS Holdings, SAAS Management, Sanjiv Ahuja and Arun Sarin. Neither SAAS Holdings nor SAAS Management has any officers or directors. Messrs. Ahuja and Sarin are individuals. Affiliates of controlling interests in the applicant, therefore, are entities owned and controlled by SAAS Holdings, SAAS Management, Mr. Ahuja and Mr. Sarin.

SAAS License does not own or control any entity. SAAS Holdings does not own or control any entity other than SAAS License. SAAS Management does not own or control any entity other than SAAS Holdings and SAAS License.

Mr. Sarin does not own or control any entity other than SAAS Management, SAAS Holdings and SAAS License.

The identity of each affiliate of Mr. Ahuja, and these affiliates' gross revenues, are set forth in Attachment 1 to this EXHIBIT B.

4. Entities with which the Applicant has an Attributable Material Relationship

As discussed in EXHIBIT C to this Form 175, SAAS License has entered into no arrangements for the spectrum lease or resale (including wholesale agreements) of any capacity of any of its spectrum. As a result, SAAS License has no attributable material relationship with any entity under Section 1.2110(b)(3)(iv)(A) of the Commission's rules.

**FCC FORM 175
FCC AUCTION 97
SAAS LICENSE, LLC
EXHIBIT B**

5. Cumulative and Aggregated

Pursuant to Sections 1.2110(b)(1)(i) and 27.1106 of the Commission's rules, the attributable cumulative and aggregated average gross revenues for the preceding three years of SAAS License, considering its affiliates and controlling interests are:

SAAS License Average	None
SAAS Holdings Average	None
SAAS Management Average	None
Sanjiv Ahuja	None
Arun Sarin	None
Affiliates of Mr. Ahuja	\$39,987.50
TOTAL	\$39,987.50

Thus, SAAS License qualifies for bidding credits as a very small business under Sections 1.2110(f)(2)(ii) and 27.1106(b) of the Commission's rules.

**FCC FORM 175
FCC AUCTION 97
SAAS LICENSE, LLC
EXHIBIT B
ATTACHMENT 1**

ATTACHMENT 1

AFFILIATES OF SANJIV AHUJA

Entity	Jurisdiction of Formation	Principal Business
Augere Holdings, LLC	Delaware	Holding Company for Telecommunications
Eaton Telecom Infrastructure, LTD	United Kingdom	Holding Company for Telecommunications
Way4orth, LLC	Delaware	Holding Company for Telecommunications
Tillman Global Holdings, LLC	Delaware	Holding Company for Telecommunications
JCDecaux Small Cells Limited	United Kingdom	Telecommunications
Apollo Towers PTE, LTD	Singapore	Telecommunications Infrastructure

GROSS REVENUES

Entity	Gross Revenues		
	2013	2012	2011
Augere Holdings, LLC	\$0.00	\$0.00	\$0.00
Eaton Telecom Infrastructure, LTD	\$0.00	\$0.00	\$0.00
Way4orth, LLC	\$79,975.00	\$0.00	None
Tillman Global Holdings, LLC	\$0.00	\$0.00	None
JCDecaux Small Cells	None	None	None
Apollo Towers PTE, LTD	\$0.00	\$0.00	\$0.00

The gross revenues provided in this Attachment 1 to EXHIBIT B are based on unaudited financial statements prepared in accordance with Generally Accepted Accounting Principles. The certification required by Section 1.2110(o) of the Commission's rules is provided in Attachment 2 to this EXHIBIT B with respect to Augere Holdings, LLC, Eaton Telecom Infrastructure, LTD, Way4orth, LLC, Tillman Global Holdings, LLC, and Apollo Towers PTE, LTD. JCDecaux Small Cells Limited has not been in existence for a full year and does not have a financial statement for the applicable reporting period.

**FCC FORM 175
FCC AUCTION 97
SAAS LICENSE, LLC
EXHIBIT B
ATTACHMENT 2**

CERTIFICATION

I, Sanjiv Ahuja, am (i) the managing member of Augere Holdings, LLC, (ii) the managing member of Eaton Telecom Infrastructure, LTD, (iii) the managing member of Tillman Global LLC, (iv) Chairman of Way4orth, LLC, and (v) Chairman of Apollo Towers PTE, LTD. In my management capacity at each of these entities, I am responsible for the financial affairs of each company. Pursuant to Section 1.2110(o) of the Commission's rules, I certify that the gross revenues figures set forth in this EXHIBIT B are true, full, and accurate, and that none of these entities otherwise has audited financial statements.

By: _____/s/
Sanjiv Ahuja

September 12, 2014

**FCC FORM 175
FCC AUCTION 97
SAAS LICENSE, LLC
EXHIBIT C**

ARRANGEMENTS FOR SPECTRUM LEASE OR RESALE

Section 1.2112(b)(1)(iii) Disclosure

SAAS License, LLC has entered into no arrangements for the spectrum lease or resale (including wholesale agreements) of any capacity of any of its spectrum.