

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GEOTAB INC. AND GEOTAB USA, INC.
Petitioners,

v.

FRACTUS, S.A.,
Patent Owner.

Case No. IPR2025-01026
Patent 11,031,677

SECOND DECLARATION OF MARK DEBOY

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1. My name is Mark DeBoy. I am over the age of twenty-one years, of sound mind, and capable of making the statements set forth in this Declaration. All the facts and statements contained herein are within my personal knowledge and/or within my field of expertise, and they are true and correct to the best of my knowledge.

2. I am a partner at Edell, Shapiro & Finnan, LLC, located at 9801 Washingtonian Blvd., Suite 750, Gaithersburg, Maryland, 20878, United States.

3. Exhibit 2017, submitted in this proceeding, is a true and correct copy of the Federal Communications Commission Report and Order FCC 97-421, “In the Matter of Reallocation of Television Channels 60-69, the 746-806 MHz Band,” Adopted December 31, 1997, Released January 6, 1998. I downloaded the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC’s website:

<https://docs.fcc.gov/public/attachments/FCC-97-421A1.pdf>.

4. Exhibit 2018, submitted in this proceeding, is a true and correct copy of the Federal Communications Commission Report and Order FCC

01-364, “In the Matter of Reallocation and Service Rules for the 698-746 MHz Spectrum Band (Television Channels 52-59),” Adopted December 12, 2001, Released January 18, 2002. I downloaded the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC’s website:

<https://docs.fcc.gov/public/attachments/FCC-01-364A1.pdf>.

5. Exhibit 2019, submitted in this proceeding, is a true and correct copy of the FCC Lower 700 MHz Band Auction #44 Bid Winners (September 18, 2002). I downloaded the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC’s website:

<https://www.fcc.gov/sites/default/files/wireless/auctions/44/chart/44cls3.pdf>.

6. Exhibit 2020, submitted in this proceeding, is a true and correct copy of the Auction 44: Lower 700 MHz Band Fact Sheet. I printed the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC’s website:

<https://www.fcc.gov/auction/44>.

7. Exhibit 2021, submitted in this proceeding, is a true and correct copy of the FCC Lower 700 MHz Band Auction #49 Bid Winners (June 13, 2003). I downloaded the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC's website:

<https://www.fcc.gov/sites/default/files/wireless/auctions/49/chart/49cls3.pdf>.

8. Exhibit 2022, submitted in this proceeding, is a true and correct copy of the Auction 49: Lower 700 MHz Band Fact Sheet. I printed the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC's website:

<https://www.fcc.gov/auction/49>.

9. Exhibit 2023, submitted in this proceeding, is a true and correct copy of the FCC Lower 700 MHz Service About Page. I printed the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC's website:

<https://www.fcc.gov/wireless/bureau-divisions/mobility-division/lower-700-mhz-service>.

10. Exhibit 2024, submitted in this proceeding, is a true and correct copy of the 3rd Generation Partnership Project; Technical Specification

Group Radio Access Network; Evolved Universal Terrestrial Radio Access (E-UTRA); User Equipment (UE) radio transmission and reception; (Release 8). I downloaded the document for submission in this proceeding on or about February 24, 2025 from the following link on the 3GPP website:

https://www.3gpp.org/ftp/Specs/archive/36_series/36.101/36101-100.zip.

11. Exhibit 2025, submitted in this proceeding, is a true and correct copy of the Federal Communications Commission Second Report and Order FCC 0090, “Service Rules for the 746-764 and 776-794 MHz Bands, and Revisions to Part 27 of the Commission's Rules,” Adopted March 8, 2000, Released March 9, 2000. I downloaded the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC’s website:

<https://docs.fcc.gov/public/attachments/FCC-00-90A1.pdf>.

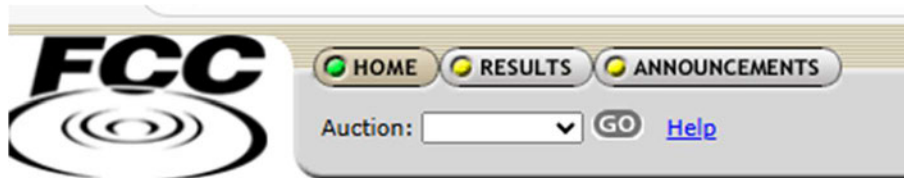
12. Exhibit 2026, submitted in this proceeding, is a true and correct copy of the FCC 700 MHz Band Auction #73 Bid Winners. I printed the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC’s website:

<https://auctionbidding.fcc.gov/auction/index.htm>.

To get to the Auction 73 bid winners, I selected “Auction 73” in the following drop down box:



On the resulting page, I clicked “Results” to display the results of the bidding:



Alternatively, the results can be reached from the link on the “Results” tab at the following FCC website:

<https://www.fcc.gov/auction/73>.

13. Exhibit 2027, submitted in this proceeding, is a true and correct copy of the Auction 73: 700 MHz Band Fact Sheet. I printed the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC’s website:

<https://www.fcc.gov/auction/73>.

14. Exhibit 2028, submitted in this proceeding, is a true and correct copy of the Letter to the Chairman of the Federal Communications

Commission Regarding Auction of Licenses in the 747-762 and 777-792 MHz Bands Scheduled for September 6, 2000 (July 20, 2000). I downloaded the document for submission in this proceeding on or about February 24, 2025 from the following link on the FCC's website:

<https://www.fcc.gov/file/15694/download>.

The download link can be reached by navigating to the FCC's webpage for Auction 31 (<https://www.fcc.gov/auction/31>) and following the "Ex Parte Communications" link:

Ex Parte Communications:
Ex Parte Communications (zip)

15. I understand and have been warned that willful false statements and the like are punishable by fine or imprisonment, or both (18 U.S.C. Section 1001) and may jeopardize the validity of the application or any patent issuing thereon. I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and further, that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of title 18 of the United States Code.

I declare under penalty of perjury under the laws of the United States
that the foregoing is true and correct.

February 25, 2026
Date

/Mark J. DeBoy/
Name (Signature)

Mark J. DeBoy
Name (Print)