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April 9, 1992

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APR - 9 1992

Federal Communications Commission
Office of the Secretary

Ms Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

Re: Gen. Docket No. 90-314 - PCS
Docket No. ET 92-9 - Emerging Technologies

Dear Ms. Secretary:

On April 8, 1992, Messrs. Wayne Schelle, Chairman, Albert Grimes, President, and W. Scott Schelle, Treasurer, all of American Personal Communications, Inc., and Jonathan D. Blake of Covington & Burling, APC's communications counsel, met with Messrs. Robert M. Pepper, Chief, John R. Williams and Evan R. Kwerel of the Commission's Office of Plans and Policy concerning the emerging technologies proceeding and the personal communications services inquiry.

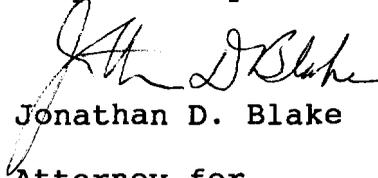
Most of the discussion concerned issues APC had addressed and positions that it had set forth in its various pleadings in the PCS inquiry. On the issue of the geographic regions that the Commission might use for purposes of PCS licensing, APC brought to the attention of OPP the 47 "Major Trading Areas" specified in the Rand McNally 1992 Commercial Atlas And Marketing Guide, the 123rd edition, at 38-40. This well-recognized concept of major trading areas might be used for the FCC licensing of PCS in much the same way that the FCC uses Arbitron's ADI market concept for broadcast television.

APC also addressed the question of the number of PCS licensees per market and some of the issues raised by the Utilities Telecommunications Council and others who have expressed concerns about some of the proposals in the emerging technologies proceeding. APC took the position that there are effective ways to enable PCS to utilize frequencies in the

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1850-1990 MHz band without causing interference to or otherwise harming existing microwave users in that band.

Respectfully submitted,



Jonathan D. Blake

Attorney for
American Personal Communications, Inc.

cc: Mr. Robert M. Pepper
Mr. John R. Williams
Mr. Evan R. Kwerel