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

MAY 29 1992

Federal Communications Commission
Office of the Secretary

SUBJECT: ET Docket No. 92-100
RM-7978

Dear Ms. Searcy:

Mobil Telecommunications Technologies Corporation (MTEL) has submitted a proposal to the Commission to adopt rules and policies providing for the licensing of carriers to operate a new Nationwide Wireless Network Service. The MTEL proposal provides for three nationwide licensees in the 930-931 MHZ band for two-way high speed data communications. Each licensee would be entitled to a 50 KHZ channel assignment. Visa supports this proposal and recommends that the Commission adopt the proposal and rules as proposed by MTEL.

Visa, as the world's largest payment system, uses a variety of communications technologies to offer our many different payment services. The retail marketplace that is currently being served by Visa is ever changing. New connectivity options are a requirement to support the demand from the marketplace for new financial services.

The availability of a Nationwide Wireless Network Service as proposed by MTEL would be of value to Visa in providing a range of services to the retail industry. The service would provide an optimum method of communications for a market segment not adequately served today by the wireline network. The proposed service would enable Visa to offer a set of services with consistent nationwide pricing and performance. This is something that is exceeding difficult in today's wireline environment.

Sincerely,

Leland Fong
Business Manager
International POS Communications Strategies

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