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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of Petitions for
Rulemaking filed by

DIAL PAGE, INC.

MOBILE TELECOMMUNICATION
TECHNOLOGIES CORP.

PACTEL PAGING (RESPECTING AN
ADVANCED ARCHITECTURE PAGING
SERVICE)

PACTEL PAGING (RESPECTING A
GROUND-TO-AIR PAGING SERVICE)

PAGEMART, INC.

CONSOLIDATED
ET DOCKET NO. 92-100

RM-7977

RM-7978

RM-7979

RM-7860

RM-7980

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JUN 21 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF ECHO GROUP L.P.

Echo Group L.P. ("Echo"), by its attorneys,
hereby submits these comments in response to the above-
captioned Petitions for Rulemaking regarding proposed
mobile services in the 930-931 MHz band.¹

Echo has previously filed its own Petition for
Rulemaking urging the Commission to promulgate rules
establishing a full duplex, two-way terrestrial mobile

¹ The Commission consolidated these petitions in the
above-captioned docket and placed them on Public
Notice April 30, 1992. See Mimeo No. 22914. Echo's
comments in this proceeding are brief; therefore, in
the interests of efficiency, its comments regarding
the petitions are consolidated in this one pleading.

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data radio service ("MDRS") on 300 KHz within the 930-931 MHz band, including rules for the awarding of three local and three nationwide MDRS licenses, with each licensee receiving 50 KHz each.² The above-captioned Petitions for Rulemaking also propose one- and two-way mobile services for licensing in the currently reserved 930-931 MHz band. Echo submits that the Commission's goal in allocating these currently unused frequencies should be to select the service or range of services whose technology best utilizes the limited spectrum while providing the most versatile uses for the public.

For instance, Echo's proposal for the 930-931 MHz band is both efficient and versatile. Its MDRS technology will not only fill the current and exploding need for two-way mobile data transmission capacity, it will also provide capacity for more advanced data transmissions. In fact, the very low cost in implementing Echo's proposed MDRS technology will enable MDRS licensees to provide such ancillary services at prices comparable with those offered by any service designed solely for such purposes. In short, allocation of 300 KHz of the limited available spectrum to an advanced technology such as MDRS

² Petition for Rulemaking to Amend Section 2.106 of the Commission's Rules to Create a New Mobile Data Radio Service in the 930-931 MHz Band, RM No. 7782 (filed July 30, 1991).

will allow the marketplace to best determine the extent to which various services should be available.

Nevertheless, Echo would not object to an allocation of frequencies in the 930-931 MHz band that also included some of the other proposals under consideration in this docket. In fact, the limited spectrum requests that have been filed could permit such a multiple or grouped allocation. In determining priorities, however, spectrum efficiency should be a primary goal.

First, of the five proposals in this docket, only one -- that of PageMart, Inc. ("PageMart") -- would offer full duplex system operations like that proposed by Echo. PageMart's proposal, however, is less spectrum efficient than Echo's; PageMart would require 800 KHz for four licensees while Echo's proposal requires only 300 KHz for six licensees. Nor does its proposed technology or service offer any distinct advantages over Echo's MDRS.³

Second, although Mobile Telecommunication Technologies Corp.'s ("Mtel") nationwide wireless network service ("NWNS") involves two-way operations, its proposal is in no way comparable to Echo's MDRS. Mtel proposes

³ Also, PageMart does not provide cost estimates for its proposed service; Echo's MDRS service will be provided at a very low cost relative to other two-way mobile telecommunications services.

a single channel, simplex, paging-like acknowledgement or "answer-back" system. In fact, Mtel's system appears to be such that it could well be converted to operate on the currently allocated nationwide paging frequencies, one of which is already licensed to Mtel. Moreover, even Mtel concedes that its proposal is no substitute for more complex two-way data services that will support the needs of companies using proprietary hand-held, computer-based services to monitor and communicate with delivery, maintenance and sales personnel.⁴ Echo's full duplex technology would in fact make MDRS such a two-way service.⁵

Finally, the three remaining proposals are all for one-way systems that either mirror services already available or do not propose to offer the variety of two-way services that would be available under MDRS. Echo does not object to the allocation of spectrum for such services, although it would suggest the grouping of similar paging-type services in a single allocation. More-

⁴ See Mtel Petition, at 9 & n.9. Because it is a one-channel simplex system, NWNS apparently could not provide "real-time" two-way services, unlike Echo's MDRS.

⁵ Not only are the two services designed for different markets, but also the two proposed spectrum allocations combined would utilize less than half the 930-931 MHz band, leaving 550 KHz for additional services.

over, with one possible exception,⁶ the small amount of spectrum requested in these proposals is by no means mutually exclusive with Echo's MDRS spectrum request. Nevertheless, to the extent there is not sufficient spectrum for the pending 900 MHz band proposals, Echo questions the need to allocate additional spectrum for one-way services essentially already available or which can be accommodated at the same cost and with equal or greater efficiency by modification of existing rules or via excess capacity of two-way service operators.

Respectfully submitted,

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⁶ The proposal for an "Advanced Architecture Paging Service" does not specify the amount of spectrum requested, proposing only that the service be allocated the remaining 1 MHz of spectrum between 930-931 MHz not otherwise allocated. See Petition for Rulemaking, RM-7979, at 11-12.

CERTIFICATE OF SERVICE

I, Simone Wu, do hereby certify that on this 1st day of June, 1992, a copy of the foregoing Comments of Echo Group L.P. was mailed by first class U.S. Mail, postage prepaid, to the following persons:

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