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VIA MESSENGER

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

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Re: ET Docket No. 92-100
Erratum to Comments of PageMart, Inc. (filed June 1, 1992)

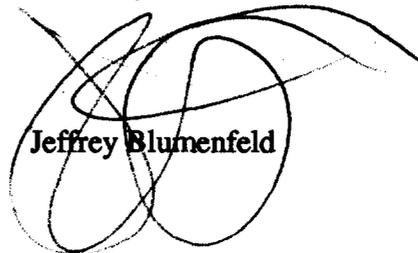
Dear Ms. Searcy:

On June 1, 1992, PageMart, Inc. ("PageMart") filed comments on several requests for pioneer's preferences (PP-35, PP-36, PP-37, PP-38, PP-39, PP-40) in the captioned proceeding. Due to an inadvertent transcription error, one of the technical terms in the comments was misstated.

<u>Page</u>	<u>Line</u>	<u>Correction</u>
49	16	Change "60,000 bits" to "60,000 bytes (approximately 500,000 bits)"

A corrected page is attached and has been served along with this letter on all parties to ET Docket No. 92-100 and the Commission's Office of Engineering and Technology.

Sincerely,



Jeffrey Blumenfeld

GBM:me
Enclosure
cc: Parties to ET Docket No. 92-100
Rodney Small, OET

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MTel, NWN zones "will likely cover more than one state" (Page B7). For example, if the state were Texas with four major cities—Dallas/Ft. Worth, Houston, San Antonio and Austin—with conventional paging systems operating at 2,400 BAUD, each city operating as a separate simulcasted system would have an effective throughput of 19,200 bps per state for 2-25 kHz channels or approximately 119% of the 16,080 (24,000 bps less 33% system overhead) per 50 kHz channel.¹³ Therefore, MTel is offering nothing new relative to existing paging technology. Since it is beyond dispute that existing paging technology cannot cost effectively offer the advanced messaging services, MTel will not be able to cost effectively offer the facsimile, graphics and lengthy text messaging capabilities envisioned for the 930-931 MHz reserve band.

Another perspective similarly demonstrates that the capacity constraints of NWN are readily apparent. PageMart estimates in its petition (RM-7980) that an average of 15,000 characters per subscriber per day during the 10-hour busy period is highly likely; this is equivalent to assuming that one fax page containing approximately 60,000 bytes (or approximately 500,000 bits) for one out of five subscribers can be expected during the 10-hour busy period. Under these conservative assumptions, NWN would be limited to serving only approximately 3,700 subscribers, assuming a 13% busy hour call rate, in major metropolitan areas the size of New York City with 18 million in population.

The simple fact is that simulcast systems are not an effective way of achieving high data throughput. Although MTel is not clear on just what geographical area

¹³ When ERMES becomes available, four conventional paging channels operating in the above four Texas cities at 6,250 kHz would be equivalent to 50,000 bps for 2-25 kHz channels and well over three times the equivalent channel efficiency of NWN.