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BEFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	
Requests to Open The 930-931 MHz Paging Reserve Band for Narrow-band Data or Paging Services	ET Docket No. 92-100
Petitions for Rulemaking	
Dial Page, Inc.	RM-7977
Mobile Telecommunication Technologies Corp.	RM-7978
PacTel Paging	RM-7979, 7960
PageMart, Inc.	RM-7980

TO: The Chief Engineer, Office of Engineering and Technology

REPLY COMMENTS OF PACTEL PAGING

1. PacTel Paging ("PacTel"), by its attorneys, hereby submits its Reply to the Comments filed with respect to the above-referenced Petitions for Rulemaking of Dial Page, Inc., Mobile Telecommunications Technologies Corp., PacTel Paging, and PageMart, Inc. (collectively the "Petitioners") for the allocation of 930-931 MHz for Advance Messaging Services ("AMS").

2. PacTel, a wholly-owned indirect subsidiary of Pacific Telesis Group, holds authorizations under Parts 21, 22, 90, and 94 of the Commission's Rules. PacTel provides one-way common and private carrier messaging services in the states of California, Nevada, Arizona, Texas, Missouri, Michigan, Kentucky, Georgia, and Florida. PacTel provides one-way services to more

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than 680,000 units, making it one of the largest providers of paging service in the country.

3. PacTel has submitted two Petitions for Rulemaking with respect to the 930-931 MHz band.[1/] In each case, PacTel's petitions are supported by field experimentation in which the proposed services have been developed and tested. By virtue of this broad-based and long-standing program of research and development of advanced messaging services, PacTel has a substantial basis in experience for informed comment in this proceeding.

I. The Comments Support The Immediate Allocation of 930-931 MHz for Advanced Messaging Services

4. The Commission has under consideration several disparate proposals for the use of the 930-931 MHz band which, not surprisingly, have generated a variety of comments. The Commission should not overlook the important common themes that emerge from these comments, notwithstanding the divergence of opinions in some instances.

5. A broad cross-section of companies with a wealth of experience in the messaging business has considered this proceeding to be sufficiently important to merit their individual attention and comment. The participants include major equipment

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[1/] One, RM-7860, seeks allocation of the three 25 KHz channels for Ground-Air Paging ("GAP") services. The other, RM-7979, seeks allocation of the remainder of 930-931 MHz not allocated to other AMS services to Advanced Architecture Paging ("AAP"). PacTel believes that both of these services represent new services fitting squarely under the mantle of AMS.

manufacturers, local, regional and national paging companies, private carriers and radio common carriers. Not a single commenter has indicated that 930-931 MHz should continue to be held in reserve. Rather, all offer various support in some form for the proposition that the state of the art for messaging has indeed advanced to the point where it is appropriate to proceed with the adoption of rules that will make 930-931 MHz available in the near term for applications.[2/]

6. The comments also contain the recurring theme that the 930-931 MHz band is ideally suited to the provision of advanced messaging services.[3/] This should, of course, come as no surprise since it was deliberate foresight on the part of the Commission that earlier led to the reservation of this strategically situated band for a future generation of paging services.

[2/] See, e.g., Comments of Celpage, Inc. (the immediate availability of 930-931 MHz for Advanced Messaging Services is a "sound regulatory idea"); Comments of Glenayre Electronics, Ltd. (urging the Commission to "move forward promptly" to accommodate the "rich variety of new messaging services" that have evolved); Comments of Motorola, Inc. (930-931 MHz needed now to "launch the next generation of paging services").

[3/] See, e.g., Comments of Motorola, Inc. (strategic location of the band between private and common carrier paging bands makes it "uniquely suited" for AMS); Comments of Glenayre Electronics, Ltd. (proximity to other paging bands will best enable manufacturers to "build upon existing experience"); Comments of Paging Network, Inc. (proximity of existing paging bands will foster flexibility in the evolution and growth of systems and facilitate the refarming of adjacent spectrum).

7. The comments also consistently reference the growth of messaging services and the inability to meet these services over existing allocations.[4] In view of the Commission's statutory mandate to foster the development of rapid, efficient, nationwide communication services, the consistent indications that there are substantial unmet needs for messaging services are an important element of the determination that an immediate allocation of spectrum is justified.

8. Finally, but perhaps most important, is the apparent consensus that the 930-931 MHz band should not be rolled into the Personal Communications Service ("PCS") proceeding. For example, Motorola, in Section VI of its comments, makes a compelling showing that the marketplace has largely rejected the 930-931 MHz band for PCS service in favor of other spectrum. Similarly, Dial Page devotes a substantial portion of its comments to making the point that it would not serve the public interest to unnecessarily complicate the allocation of 930-931 MHz by consolidating this proceeding with the allocation of spectrum for PCS in the 1.8 GHz band.[5]

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[4] See, e.g., Comments of Arch Communications Group (explosive growth of wide-area paging services cannot be met over existing allocations); Comments of MTEL (the filings document an "immense consumer and business demand" for advanced messaging services); Comments of Glenayre (explosive developments in small, hand-held non-voice terminals has created unmet needs).

[5] Since the allocation of 1.8 GHz involves wholly unique issues relating to the clearing of spectrum and coordination with existing users, PacTel agrees with Dial Page's conclusion in this regard.

9. In sum, the Commission must view the comments, as a whole, to offer substantial support for the immediate allocation of the 930-931 MHz for advanced messaging paging.[6]

II. The 930-931 MHz Band Should be Preserved For One-Way Services

10. PacTel supports the efforts of Telocator and others to allocate 930-931 MHz for AMS. And, PacTel fully understands the concerns of Arch Communications Group that the Commission cannot allow this critical strategically placed spectrum to be converted from one-way to two-way uses. [7] Like Arch, PacTel has experienced explosive subscriber unit growth and knows that additional a substantial allocation of one-way messaging channels will be absolutely necessary to meet well-documented demands for traditional wide area one-way messaging services and advanced one-way messaging services.[8]

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[6] PacTel notes that some commenters have taken an adversarial position with respect to PacTel's proposed services. In separate replies, PacTel is answering those points. See PacTel's Reply Comments to PP-38, and PP-39.

[7] PacTel submits that services denominated as one-way that require mobile to base transmissions on dedicated return link channels are for all purposes two-way services because they would entail transmissions in two directions. It does not change the character of a service from two-way to one-way merely because the nature and quality of the return link transmission is limited. Furthermore, PacTel understands Arch's observation that a service consisting of only mobile to base transmissions would need considerable protection from adjacent channels. See Arch's Comments p. 3, fn 3.

[8] In the event that the Commission takes a flexible approach to allocating the 930-931 MHz band and permits simplex mobile to base transmissions of limited power within the base to mobile channel, PacTel proposes that eh Commission nevertheless allocate the spectrum in 25 KHz channels and

11. PacTel would also like to expand on Arch's comment that certain proposals made for this band "can and will be offered on other two-way channels such as cellular or the Personal Communications Services ("PCS") allocations being proposed at 1.8-2.2 GHz."[9] Some of the two-way Petitions for Rulemaking currently pending before the Commission propose cellular-like messaging services.[10] PacTel submits that two-way cellular-like messaging services do not warrant an additional allocation because these services could be or will be, if demand exists, offered on existing cellular frequencies[11] or in the future on PCS frequencies. These two-way services will, for the most part, require infrastructure, frequency planning, and

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require any mobile to base service to accept whatever interference is generated by lawful operation of adjacent channel transmitters. Uniform channel spacing will allow for greater flexibility in licensing because all channels will be equivalent.

[9] Arch's Comments at pp. 6-7.

[10] PageMart's proposal is so cellular-like that the company cites the 1979 Bell System Advanced Mobile Phone System ("AMPS") objectives as the governing principles that led to the development of its proposed PIMS. See PageMart Comments at note 26. Paging Network has also submitted a cellular-like one-way messaging service called VoiceNow. PacTel's comments equally apply to PageNet's proposed service even though it is denominated as a one-way service because it will have mobile to base transmissions. See, In the Matter of Paging Network, Inc. Petition for Rulemaking to Allocate the 930-931 Reserve Band for the Establishment of Advanced Paging Services, ET Docket 92-100, Filed June 1, 1992 (not currently assigned a specific rulemaking number).

[11] Cellular carriers currently have the flexibility to offer services other than traditional cellular services in their assigned frequencies.

terminal equipment similar if not identical to the ones currently suggested for digital cellular and the currently proposed one for PCS. In fact, cellular systems today do some of the functions described by the two-way Petitioners as part of the two-way service.[12/] Indeed, the two-way services are more appropriately described as PCS services being proposed for allocation at 1.8-2.2 GHz.

12. PacTel, therefore, respectfully requests that the Commission maintain the 930-931 MHz band for one-way AMS services and that the Commission expeditiously move forward with allocating 930-931 MHz for such one-way messaging services.

[12/] For example, PageMart, Inc. would have a page go out over the entire system to locate a subscriber. The subscriber unit would then respond to the system-wide page. The system would then locate the subscriber and only transmit information to it from the closest transmitter. This is the same system function performed in setting up a cellular call. Indeed, what PageMart has proposed is part of the GSM standard in Europe for Pan European PCS systems.

PacTel, therefore, respectfully requests that the Commission maintain the 930-931 MHz band for one-way AMS services and that the Commission expeditiously move forward with allocating 930-931 MHz for such one-way messaging services.

Respectfully submitted,

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Dated: June 16, 1992

CERTIFICATE OF SERVICE

I, Tana C. Maples, hereby certify that on this 16th day of June, 1992, I caused copies of the foregoing REPLY COMMENTS OF PACTEL PAGING to be sent by U.S. first class mail, postage prepaid, or by hand-delivery as specified, to the following:

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