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July 6, 1992

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Re: Ex Parte Presentation  
ET Docket No. 92-100;  
GEN Docket No. 90-314

Dear Ms. Searcy:

On July 6, 1992, Gerald Udwin spoke on behalf of PacTel Paging ("PacTel") with Michele Farquhar of Commissioner Duggan's office.

The purpose of the meeting was to discuss the issues unique to the 930-931 MHz band that require special attention and comment in any forthcoming Notice of Proposed Rulemaking regardless of whether the allocation of this reserve band is considered as part of the Personal Communications Service docket (Gen Docket No. 90-314) or in a separate Advanced Messaging Service proceeding.

Pursuant to Section 1.1206 of the Commission's rules, a copy of the material distributed at this meeting is attached hereto.

Should any questions arise in connection with this matter, please contact the undersigned.

Very truly yours,

  
E. Ashton Johnston

Enclosures  
CWN/tcm DC01 0028703

cc: Michele Farquhar  
Senior Legal Advisor to Commissioner Duggan

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**Issues Unique to the 930-931 MHz Band  
Which Require Special Attention And  
Comment in the Notice of Proposed Rulemaking**

Regardless of whether the allocation of the 930-931 Mhz reserve band is considered as part of the Personal Communications Service ("PCS") proceeding or in a separate Advanced Messaging Service ("AMS") proceeding, there are critical issues that PacTel Paging ("PacTel") submits deserve careful attention in the Notice of Proposed Rulemaking ("NPRM") and on which the Commission should specifically seek comment:

1. **Should 930-931 MHz be dedicated to AMS uses?** The strategic location of this band between the private carrier paging (929-930 MHz) and common carrier paging (931-932 MHz) bands earlier caused the Commission to earmark this spectrum for advanced paging uses. Several private and common carrier companies (e.g., PacTel Paging, Arch Communications Group, PageNet, Inc.) have stressed the importance of maintaining this band for AMS due to the explosive growth in the demand for messaging services. PacTel's view is that discrete services, such as AMS, can efficiently be designated for particular spectrum even if they fall within a broader category of services designated as "PCS".

2. **Should assignments of 930-931 MHz be based upon a 25 KHz channel plan?** 25 KHz channels are the standard utilized in both the 929-930 MHz and the 931-932 Mhz band for paging uses. Commenters in the AMS proceeding (ET Docket No. 92-100) generally advocate that the same channelization be adopted for 930-931 Mhz. This would allow maximum advantage to be taken of the developmental work being done by paging carriers and equipment manufacturers. It also would facilitate the importation of the advanced technologies to the adjoining bands over time. PacTel supports a 25 KHz channel plan for 930-931 MHz.

3. **Should two-way communications be allowed in the 930-931 Mhz band?** Commenters in ET Docket No. 92-100 have expressed various views on the scope of messaging services that should be allowed in the 930-931 Mhz band. Some, including PacTel, view AMS as strictly a one-way service. Others consider AMS to

include limited two-way communications (ie. simplex operations, or return links in which the character of the communications is limited in scope such as to signal the location of the receiver or acknowledge receipt of the message). PacTel believes that comments should be solicited on this important definitional issue.

4. **Are there technical problems associated with allowing two-way communications in the 930-931 MHz band?** Some commenters in the AMS proceeding have expressed concerns that high-powered paging signals which are being transmitted in the 929-930 and 931-932 MHz bands, and which should be allowed in the 930-931 Mhz band to permit wide-area AMS services to be provided on a cost-efficient basis, will interfere with low powered two-way communications in this band. Also, the provision of two-way service may require the use of guardbands which will be less spectrally efficient. PacTel's view is that any two-way use be required to co-exist with the wide-area one-way uses for which need has been shown.

5. **If the allocation of 930-931 MHz specifically for AMS uses is considered in the larger PCS proceeding, should steps be taken to expedite the decisionmaking with respect to this portion of the reserve band?** The assignment of PCS spectrum in the 1.8 to 2.2 GHz band raises complex issues respecting spectrum sharing and spectrum clearing that do not pertain to 930-931 MHz which is still in reserve. The immediate allocation of 930-931 MHz also will satisfy unmet needs for service, and will enhance the competitiveness of domestic equipment manufacturers by enabling them to perfect and deliver advanced messaging product at an earlier date. If the allocation of 930-931 MHz is considered in the PCS proceeding, and after the broad issues which are common to the entire family of PCS services (e.g. public need, common carrier vs. private status etc.) have been considered, the Commission should keep open the possibility of issuing a First Report and Order which carves out 930-931 MHz for immediate application, and seek comment on the possible benefits of this approach.