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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

SEP 26 1991

In the Matter of)
)
ECHO GROUP L.P.)
)
Petition for Rulemaking to Amend)
Section 2.106 of the Commission's)
Rules to Create a New Mobile Data)
Radio Service ("MDRS") in the)
930-931 MHz Band)

ET 92-100
RM-7782
Federal Communications Commission
Office of the Secretary

COMMENTS OF TELOCATOR

Telocator, by its attorneys, hereby submits its comments on the above-captioned Petition for Rulemaking filed by Echo Group, L.P. ("Echo") on July 30, 1991.¹ The petition proposes allocation of six 50 KHZ channels within the 930-931 MHz band for a new two-way, mobile data radio service ("MDRS").² As detailed below, Echo's request should be addressed as part of a broader rulemaking proceeding

¹ Petition for Rulemaking to Amend Section 2.106 of the Commission's Rules to Create a New Mobile Data Radio Service ("MDRS") in the 930-931 MHz Band, RM-7782, filed July 30, 1991 ("Petition for Rulemaking").

² Alternatively, Echo requests "that the Commission incorporate its proposals into other rulemaking proceedings that it plans to initiate for allocation of the frequencies proposed herein or for any other rulemaking proceeding relating to mobile data services." Petition for Rulemaking at 2. While Echo specifically requests allocation of spectrum within the 930-931 MHz band, it has stated that its spectrum needs could be satisfied alternatively in the 901-902 MHz or 940-941 MHz bands. Id. at 9.

previously sought by Telocator to allow use of 930-931 MHz for a wide range of Advanced Messaging Services ("AMS").³

Echo requests 300 KHz of spectrum within the 930-931 MHz band to accommodate six licensees who would provide mobile data radio services.⁴ MDRS's purpose is to enable small, mobile computers to communicate with larger home or business computers by employing frequency division, Time Division Multiple Access ("TDMA"), packet transmissions, frequency reuse and hand-off capabilities. Anticipated service offerings include commercial, personal and emergency services -- such as burglar alarm monitoring, personal computer data transmission, credit card verification, point-of-sale information monitoring, delivery service monitoring, facility monitoring and radio location services.⁵

Telocator, the trade association for the personal communications industry, is a strong proponent of the development of new and innovative telecommunications services. In such respects, the Commission has already

³ Telocator Petition For Rulemaking to Amend Part 22 of the Commission's Rules Concerning The Use of 930-931 MHz For An Advanced Messaging Service. (filed January 23, 1991) ("AMS Petition").

⁴ Petition for Rulemaking at 4. Echo proposes that three of the six licensees be assigned on a nationwide basis, and the other three licensees be assigned in each Metropolitan Statistical Area ("MSA") and Rural Service Area ("RSA"). Id. at 19.

⁵ Id. at 8-9.

received public comments supporting the association's request for a rulemaking to allow use of 930-931 MHz for an Advanced Messaging Service ("AMS").

In its petition, Telocator described AMS broadly to encompass a wide range of messaging services operating under flexible rules. Telocator envisions AMS will be utilized for such advanced functions as graphic and image messaging services, portable applications of electronic mail and voice mail, numerous new consumer applications, and as a means to find and alert customers of new PCS services contemplated in the Commission's pending inquiry.⁶ In addition, Telocator anticipates that AMS would be used to provide new sophisticated telecommunications services to users of "powerful but inexpensive, lightweight laptop and handheld computers, (e.g., pocket organizers) which have presented new ways of improving business productivity."⁷

To ensure the best development of innovative advanced messaging services, Telocator has requested that the Commission establish "flexible" policies to regulate AMS. Such an approach will allow licensees to offer services authorized under AMS at their discretion, and not unnecessarily limit options for service offerings. Given

⁶ See Amendment of the Commission's Rules to Establish New Personal Communications Services, 5 FCC Rcd 3995 (1990) ("Notice of Inquiry").

⁷ AMS Petition at 8.

the flexibility of the regulatory framework requested for AMS, Echo's more specific proposal for a mobile data radio service can and should be considered within the framework of a rulemaking proceeding initiated in response to Telocator's AMS petition.

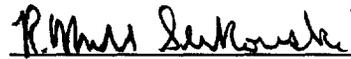
By incorporating Echo's proposal into a rulemaking proceeding for Telocator's AMS petition, the Commission would be able to examine Echo's proposed service in conjunction with the full range of important potential service options for 930-931 MHz. This approach would permit the greatest opportunity for circumspect review of the mobile data radio service proposal, given inherent spectrum scarcity in the 900 MHz band. This action would also be consistent with Echo's recognition that its request might be pursued within the framework of pending rulemaking proceedings.

In view of the foregoing, Echo's proposal for the establishment of a mobile data radio service should be incorporated into the AMS rulemaking proposed by Telocator. In this way, the Commission can best accommodate and give full and thoughtful consideration to a variety of service proposals, as well as effectuate the prompt and efficacious

introduction of new and innovative Advanced Messaging
Services.

Respectfully submitted,

TELOCATOR



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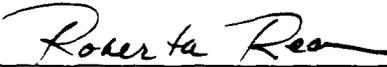
Its Attorneys

September 26, 1991

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of
September, 1991, I caused copies of the foregoing "Comments
of Telocator" to be mailed via first-class postage prepaid
mail to the following:

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