

June 30, 1992

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ORIGINAL FILE

Dear Ms. Haller:

I'm curious about one aspect of the recent NPRM in PR Docket 92-79 that was not addressed. The purpose of Docket 92-79, the proposal to eliminate end-user licensing in the Specialized Mobile Radio Service, was stated to be to "reduce significantly unnecessary reporting burdens on industry and administrative costs to the Commission".

Aren't each of the applications submitted by end users of 800 and 900 MHz SMR systems accompanied by a \$35 license fee? Doesn't this fee cover the cost of the administration of this service? Since the license fees are supposed to at least meet the cost of administration, I'm assuming that there is probably even a negligible profit associated with the processing of each application. In any case, this will be lost if licensing is discontinued. Why wasn't the matter of license fees even mentioned in the brief discussion of administrative costs?

In theory, then, this proposal will save the Commission absolutely nothing. Of course, the Commission will no longer have to maintain system loading cards (which they probably wouldn't after 1993, anyway.)

Why weren't these facts mentioned in the Notice or, more importantly (if nowhere else), in the Regulatory Flexibility Analysis accompanying the Notice?

Also, what exactly makes this proposal more viable than past ones? In the Order in RM-6755, the Commission stated that they foresaw "a continuing need to collect such information" and that "there is no viable alternative...to our process at this time". Yet the 1990 petition proposed even more stringent reporting requirements than the current proposal does! But all of the sudden, elimination of user licensing appears workable. What has caused such a change? Both of these points indicate that there is more to this proposal than is evident, and it has me curious. I'd appreciate a reply.

Thank You

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P.S. Are you any relation to Ralph Haller?

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