



PUBLIC NOTICE

ORIGINAL
FILE

FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET N.W.
WASHINGTON, D.C. 20554

News media information 202/632-5050. Recorded listing of releases and texts 202/632-0002.

July 23, 1992

SUNSHINE
~~CORRESPONDENCE~~
FILE

Notice of Prohibited Presentations
Received During Sunshine Period

GEN Docket No. 90-314 and ET Docket No. 92-100

Amendment of the Commission's Rules to Establish New
Personal Communications Services

This serves to provide notice of written presentations concerning the above referenced proceeding. These presentations, in the form of letters from the Cellular Telecommunications Industry Association and Kycom, were received subsequent to release of the Sunshine Agenda public notice on July 9, 1992, but prior to release of the text of the Commission decision and, therefore, are prohibited under Section 1.1203 of the Commission's Rules. Copies of the presentations have been placed in a file associated with (but not made a part of) the record in the proceeding, and are available for public inspection. See 47 CFR Sections 1.1203 and 1.1212(e), (f).

Action by the Managing Director.

CTIA®

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90-314
92-100

JUL 13 1992

July 8, 1992

Federal Communications Commission
Office of the Secretary **Thomas E. Wheeler**
President/CEO

Robert M. Pepper
Chief, Office of Plans & Policy
Federal Communications Commission
Room 822, 1919 M Street, N.W.
Washington, D.C. 20554

RECEIVED

JUL 10 1992

OFFICE OF PLANS & POLICY

Dear Mr. Pepper:

Press reports indicate that the Commission is currently considering a licensing plan for personal communications services (PCS) based upon nationwide as well as regional licensees. We urge you to reject this structure on the grounds that it disadvantages potential consumers of PCS who do not live in big cities, denies entrance to entities other than corporate behemoths and eliminates competition from wireline cellular providers.

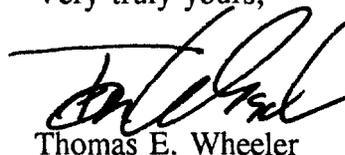
In its cellular licensing plan the Commission chose to create 734 license areas. The result of these "bite size" license areas was that every area now has within it an operational cellular system. These systems are owned by over 180 different companies of varying sizes. If, for instance, the Commission should adopt (as is reported) the 47 Rand McNally Trading Areas or, worse yet, grant one or more national cellular licenses, only a corporate giant will be able to finance construction of such a huge area. And even a corporate giant will be hard pressed to provide rapid service in rural as well as urban areas.

The Commission's cellular licensing model was a success. Rural and urban America both received service in record time. In only eight and one half years consumers went from no cellular service to service in every license area. Cellular service has exceeded even its greatest proponents' expectations. Why change the methodology which has proven so successful?

Enclosed is a map which shows existing cellular license areas as well as the 47 Rand McNally Trading Areas. Not only do these trading areas split existing cellular license areas, they also ignore LATA boundaries which effectively bar the Bell Operating Companies, and their affiliates, from these new licenses, thereby sheltering the new PCS licensee from competition.

We hope this map is helpful in quantifying an heretofore abstract concept. Bigger is not better when it comes to serving all of America as quickly as possible and stimulating competition.

Very truly yours,



Thomas E. Wheeler

Enclosure

Cellular Telecommunications Industry Association

1133 21st St. N.W., Third Floor, Washington, D.C. 20036 • (202) 785-0081 • FAX (202) 785-0721



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Federal Communications Commission
Washington

July 14, 1992

Andrew C. Barrett
Commissioner

Office of the Secretary:

The attached letter from Cellular Telecommunications Industry Association was received in this office on July 9, 1992 and is the subject of an agenda item scheduled for discussion before the full Commission on July 16.

It is therefore submitted to your office for inclusion in the files and should be considered as an exparte filing.

Delores C. Browder

Enclosure



July 8, 1992

Thomas E. Wheeler
President/CEO

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JUL 14 '92
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE
SECRETARY

Commissioner Andrew C. Barrett
Federal Communications Commission
Room 844, 1919 M Street, N.W.
Washington, D.C. 20554

Dear Commissioner Barrett:

Press reports indicate that the Commission is currently considering a licensing plan for personal communications services (PCS) based upon nationwide as well as regional licensees. We urge you to reject this structure on the grounds that it disadvantages potential consumers of PCS who do not live in big cities, denies entrance to entities other than corporate behemoths and eliminates competition from wireline cellular providers.

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Very truly yours,

Thomas E. Wheeler

Enclosure

Cellular Telecommunications Industry Association

1133 21st St. N.W., Third Floor, Washington, D.C. 20036 • (202) 785-0081 • FAX (202) 785-0721



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kycom

96 Hillbrook Drive Portola Valley, CA 94028 (415) 851-1615 Fax (415) 851-1870

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JUL 14 '92

Received

JUL 13 1992

FEDERAL COMMUNICATIONS
OFFICE OF THE
SECRETARY

OFFICE OF
COMMISSIONER
MARSHALL

July 8, 1992

Kathleen Q. Abernathy, Esq.
Federal Communications Commission
1919 M Street NW, Room 826
Washington, DC 20554

Dear Kathy:

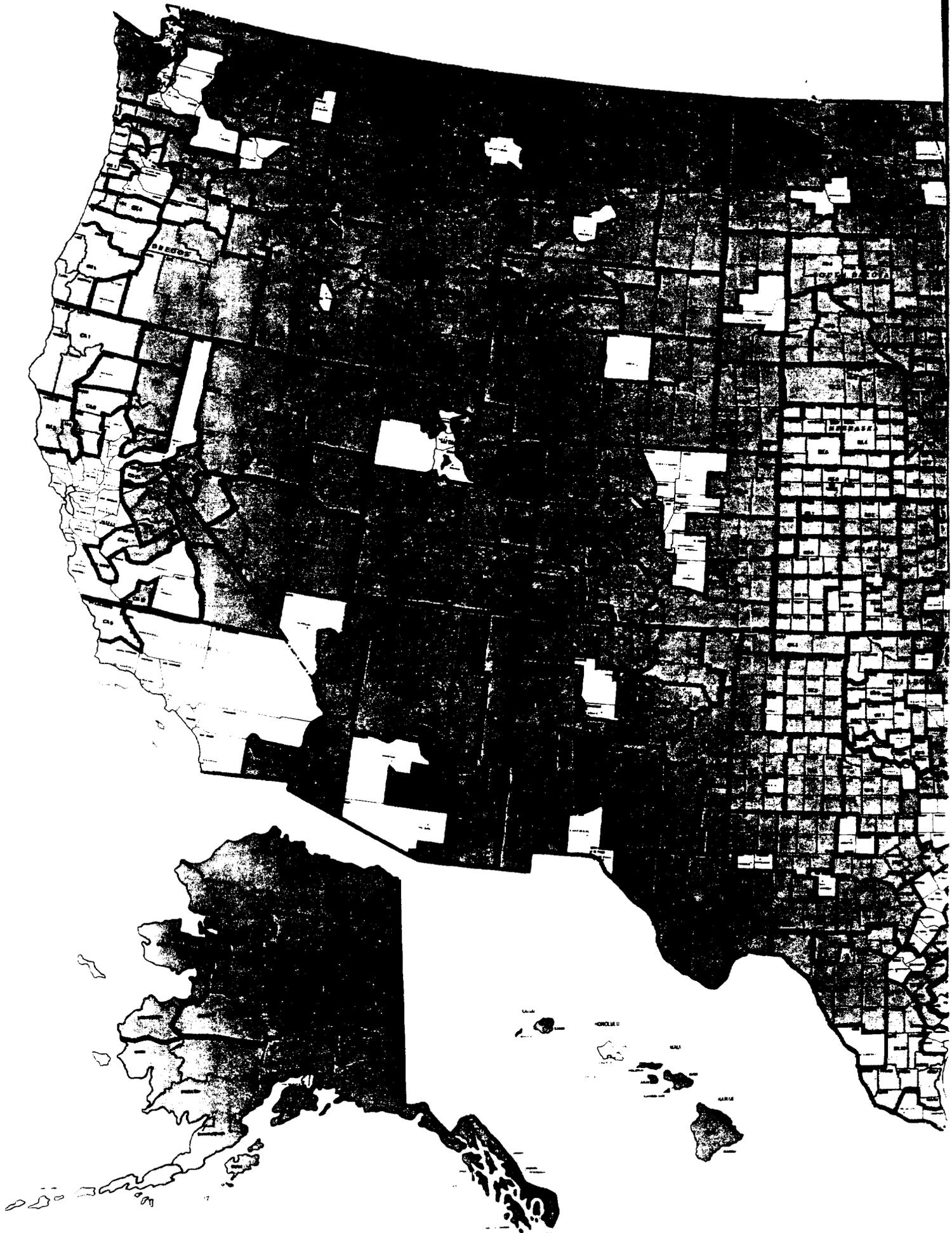
I enjoyed meeting with you on July 1 and discussing PCS from a small business perspective. My written comments and recommendations are contained in my July 1 letter to Chairman Sikes, a copy of which I left with you at our meeting.

Right now small businesses and potential investors in small business are somewhat confused by all the possible ramifications of the PCS licensing process. I am recommending a clear policy which calls for the licensing of reasonable sized areas, like counties, with accommodations for small businesses that will allow them to participate in the licensing process. If this is done, the small businesses of the country will be able to raise money and start now with their planning to implement a final PCS service.

I have enjoyed discussing these issues with you and hope you will keep small businesses in mind as the development of PCS continues. Please let me know your reactions to my comments.

Sincerely,

Robert H. Kyle
President





■ Rand McNally Trading Areas



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