

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Creation of a New Radio Service)
"Public Facsimile Broadcast Service") RM-7760
and Allocation of Channels Therefor)

COMMENTS OF TELOCATOR

Telocator, by its attorneys, hereby submits its comments on the above-captioned Petition for Rulemaking filed by Edwards/Montauk Telecommunications Corporation ("E/MTC") on May 22, 1991.¹ E/MTC requests the allocation of 930-931 MHz for a new Public Facsimile Broadcast Service ("PFBS"). According to the Petition, PFBS contemplates the broadcasting of facsimile messages and programs.

As the trade association for the personal communications industry, Telocator strongly supports efforts to afford consumers expanded choices of new and innovative telecommunications services. In keeping with this objective, Telocator has previously requested that the Commission initiate a rulemaking proceeding to allow use of 930-931 MHz for an Advanced Messaging Service ("AMS"). AMS would allow deployment of advanced digital technologies to meet a growing demand for services that combine messaging and paging functions.

¹ Creation of a New Radio Service "Public Facsimile Broadcast Service" and Allocation of Channels Therefor, RM-7760, filed May 22, 1991 ("Petition for Rulemaking").

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Telocator's petition documents a wide range of creative and sophisticated applications possible in the 930-931 MHz band. AMS would offer graphic and image messaging services, mobile and portable applications of electronic mail and voice mail, as well as a variety of new consumer applications. AMS would also complement and facilitate the introduction of other new services under consideration in the Commission's ongoing PCS inquiry.

E/MTC now requests that the Commission allocate 930-931 MHz for a different and more narrow purpose. E/MTC would use that spectrum to establish PFBS for the broadcast transmission of facsimile messages and programs to receivers that are connected to a FAX machine. Unlike Telocator's AMS petition, the proposal for PFBS contemplates offering only one type of service -- facsimile service by radio.

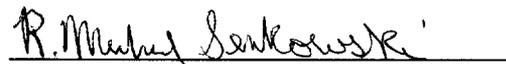
Telocator agrees with E/MTC that there is consumer demand for facsimile services. However, the scope of E/MTC's proposal is too limited and narrow to justify the allocation of scarce spectrum in the 930-931 MHz band. Given the need for the efficient use of spectrum, the Commission could best accommodate the recognized need for facsimile services by authorizing the use of 930-931 MHz for advanced digital services as proposed in Telocator's petition. AMS, of course, would give licensees the flexibility to focus on the facsimile marketplace, at their discretion, without

precluding other licensees from pursuing other equally important forms of advanced messaging needs.

In view of the foregoing, Telocator must oppose the petition for rulemaking to establish Public Broadcast Facsimile Services insofar as it requests allocation of frequency in the 930-931 MHz band. However, given the public interest in receiving advanced messaging services such as facsimile, Telocator urges the Commission to commence promptly a rulemaking proceeding in response to Telocator's Petition for Rulemaking to allow use of 930-931 MHz for advanced messaging services. Such action will effectuate the introduction of advanced messaging services, including facsimile services, and help meet growing consumer demand for innovative and sophisticated messaging telecommunications services.

Respectfully submitted,

TELOCATOR



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August 13, 1991

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August, 1991,
I caused a copy of the foregoing "Comments of Telocator" to
be transmitted via facsimile service and mailed via first-
class postage prepaid mail to the following:

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