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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM-7760

In the Matter of)
Creation of a new Radio Service)
"Public Facsimile Broadcast Service")
and allocation of channels therefor)

TO: The Commission

COMMENTS OF PACTEL PAGING

PacTel Paging ("PacTel"), by its attorneys, hereby comments on FAX-MAX Services Co.'s ("FAX-MAX") petition for the creation of a new radio service, Public Facsimile Broadcast Service ("PFBS"), and allocation of channels for such service in the 930-931 MHz frequency band ("Petition").¹

PacTel is a licensee under Part 21, 22, 90, and 94 of the Commission's Rules. PacTel provides one-way common carrier and private paging, improved mobile telephone service (IMTS), point-to-point microwave, and air-to-ground services. PacTel is one of the larger providers of one-way paging in the United States. PacTel is a wholly owned indirect subsidiary of Pacific Telesis Group, a diversified telecommunications company.

PacTel has a couple of comments on FAX-MAX's Petition. First, FAX-MAX has described PFBS as a "hybrid broadcast/common carrier service".² We believe that the 930-

¹ 930-931 MHz is currently unallocated but is being held in reserve for Advanced Paging Service.

² Petition, p.1.

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931 MHz band must be saved for Advanced Messaging applications, which will require new spectrum, and to serve the growing demand for conventional and enhanced messaging. In some of the top 10 metropolitan statistical areas, all Part 22 one-way paging channels have been authorized. With the growing demand for regional messaging services,³ this frequency band must be kept in the messaging arena to serve those needs. Since PFBS is a hybrid service, it seems to make more sense to offer this service under the flexibility already accorded FM broadcasters.⁴ Under that flexibility, no additional allocation of scarce spectrum would be necessary.⁵

Second, FAX-MAX's vision of conventional one-way paging is too narrow. Conventional one-way paging already has the capability to, and does deliver, many kinds of data to the public. For example, some paging operators currently deliver stock quotes and sports scores -- two of the services described by FAX-MAX as potential uses for PFBS. In addition, pagers which can accommodate large volumes of data are already available and can be used for such purposes as delivery of

³ In a poll of the 11 largest paging carriers representing 39% of the market, conventional one-way paging has experienced an annual 17% growth in subscribers during the last two years. Telocator Bulletin, Vol. 91, No. 31 (August 9, 1991).

⁴ Section 73.295.

⁵ In fact, FAX-MAX itself suggests other frequencies might be suitable for this service. FAX-MAX states "[b]ut, we also believe any other group of channels exhibiting similar propagation characteristics could be used." Petition at para. 3.

United Press International wire stories. All FAX-MAX is proposing is to transmit data which can be done today in a different format. With the advent of higher speed messaging systems and new services, such as Advanced Architecture Paging⁶, facsimile will be one of the advanced messaging services offered; therefore, a separate service allocation solely for PFBS is unwarranted.⁷

PacTel, therefore, respectfully requests that the Commission find other ways to satisfy FAX-MAX's request for

⁶ Pacific Telesis Group, PacTel's ultimate parent corporation, filed on July 29, 1991 with the Commission, a notice that it intended to begin testing of Advanced Architecture Paging, a new service, which will accommodate some of these services, such as facsimile, e-mail, and large message data.

⁷ In fact, because PBFS is essentially a fixed service, scarce mobile channels should not be used for this service. 930-931 MHz has been reserved for mobile uses, and should remain so.

frequency other than a rulemaking for 930-931 MHz.

Respectfully submitted,

PACTEL PAGING

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Dated: August 19, 1991

CERTIFICATE OF SERVICE

I, Tana C. Maples, hereby certify that on this 19th day of August, 1991, copies of the foregoing "COMMENTS OF PACTEL PAGING" were hand delivered, delivery charges prepaid, or mailed by first class United States mail, postage prepaid, to the following:

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