correspondence to multiple base stations. To clarify this provision, PageNet recommends that the last sentence be deleted and replaced with the following statement: "Point-to-point transmission on these channels will not be authorized."

V. CONCLUSION

The Commission has laid a solid foundation from which paging providers will be able to launch new and improved services to consumers more rapidly than ever before. However, PageNet strongly believes that the Commission must include one more element in its scheme in order to maximize incentives and reduce administrative costs to both carriers and the Commission -- the Commission must expand the geographic scope of existing and new licenses. Such an approach would reflect economic and market realities, and be consistent with the Commission's proposed licensing scheme for PCS. A market area licensing scheme would interoperate with the proposed first come, first served licensing procedure, which provides a means through which applications are granted expeditiously to entities which intend to and are fully capable of building efficient systems and providing service to the public.

PageNet believes that to further ensure the integrity of its licensing process, the Commission should adopt strict construction requirements. PageNet also

supports the finder's application and automatic termination of authorizations as a means to facilitate the Commission's goal of ensuring that valuable and scarce spectrum does not remain underutilized.

In addition, PageNet strongly urges the Commission to adopt a different view of height and power limitations with respect to the licensing of stations in the 900 MHz band. Allowing these stations to be licensed with maximum power up to 3500 watts reflects the reality of the marketplace, its competitive structure, and will result in cost saving efficiencies.

The adoption of these proposals, in conjunction with the revisions and clarifications to the proposed rules set forth herein, is clearly in the public interest, and will allow for the growth of the paging industry and the provision of the best possible service to the public well into the next century.

Respectfully submitted,

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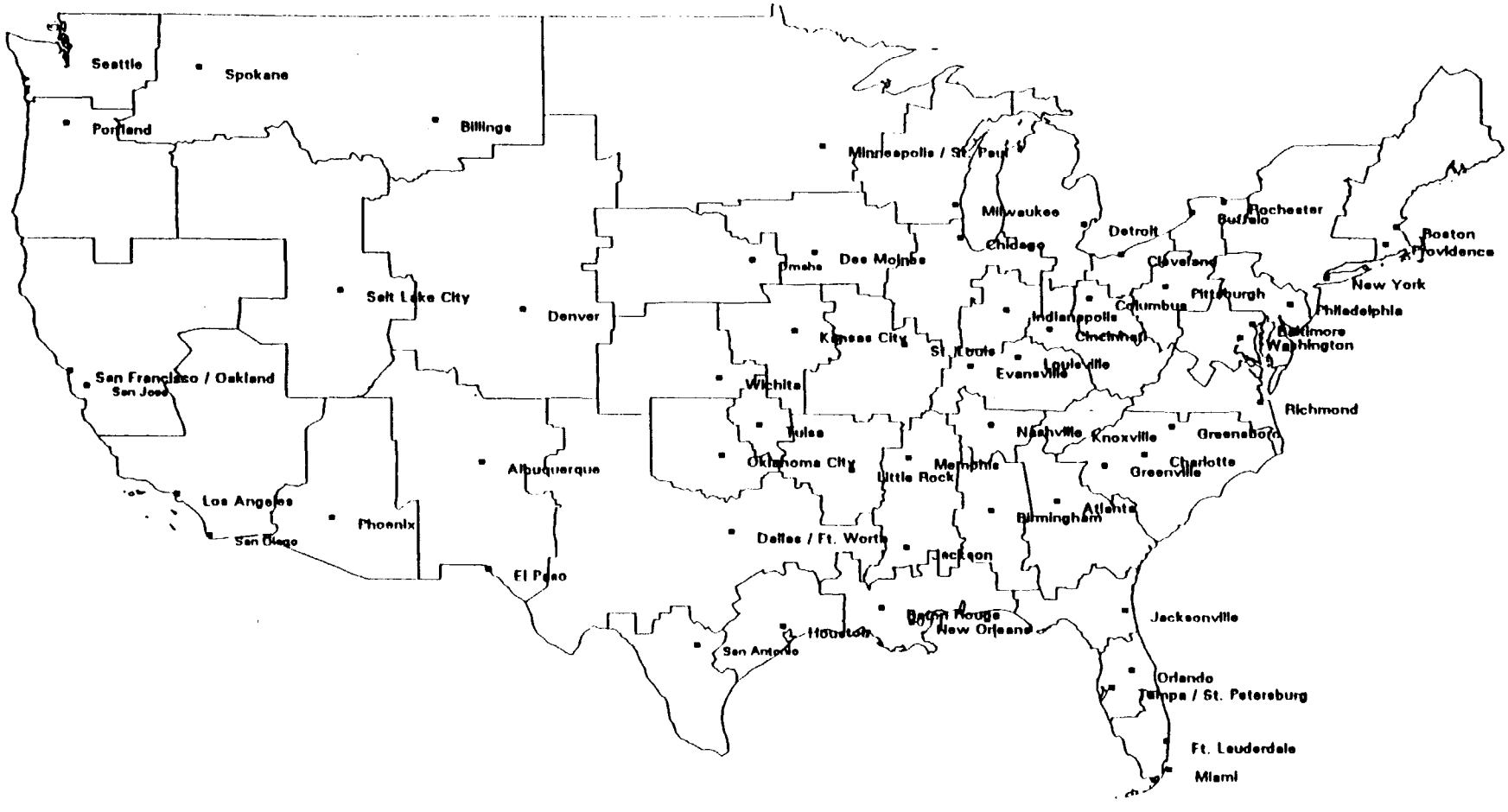
EXHIBIT A

Rand McNally Trading Areas (47)



Major Trading Area	MTA Abbrev.	Number of Basic Areas	Number of Counties	Population Census 04/01/80	% Change 04/01/80 04/01/90	Area (Sq. Mi.)	Population Density (Pop/Sq. Mi.)	Estimate 12/31/90
Atlanta	ATL	14	156	6,942,084	17.3	59,078	117.51	7,052,700
Birmingham	BIR	10	55	3,244,076	3.8	39,770	81.57	3,257,200
Boston - Providence	BOS-	14	47	9,452,712	7.2	53,732	175.92	9,513,100
Buffalo - Rochester	BUF	4	19	2,777,046	-1.3	14,096	197.01	2,776,100
Charlotte - Greensboro - Greenville - Raleigh	C-G-G-R	23	134	9,752,317	12.2	76,997	126.66	9,847,000
Chicago	CHI	18	84	12,069,700	0.6	46,055	262.07	12,098,700
Cincinnati - Dayton	CIN-	9	71	4,716,666	-0.9	30,968	152.31	4,716,800
Cleveland	CLEV	10	25	4,945,749	-2.9	12,973	381.23	4,939,000
Columbus	COL	6	29	2,145,561	6.3	13,277	161.90	2,157,700
Dallas - Ft. Worth	DAL-	22	210	9,694,157	17.4	218,093	44.45	9,788,300
Denver	DEN	12	104	3,880,637	10.7	223,131	17.39	3,902,800
Des Moines - Quad Cities	DES-	13	102	3,006,139	-5.1	58,280	51.58	2,997,600
Detroit	DET	18	84	10,001,009	0.5	46,881	213.42	10,030,300
El Paso - Albuquerque	ELP-	8	37	2,113,890	19.3	139,882	15.11	2,146,900
Honolulu	HON	4	5	1,108,229	14.9	4,993	221.36	1,120,200
Houston	HOU	6	46	5,190,849	15.2	41,763	124.29	5,221,000
Indianapolis	IND	11	54	3,017,475	0.8	21,745	138.77	3,022,800
Jacksonville	JAX	7	49	2,274,933	20.9	29,976	75.89	2,311,500
Kansas City	K.C.	9	71	2,913,304	4.9	42,955	67.82	2,933,200
Knoxville	KNOX	3	38	1,721,911	1.3	15,327	112.34	1,724,800
Little Rock	L.R.	9	61	2,051,887	4.7	44,989	45.62	2,061,100
Los Angeles - San Diego	L.A.-	7	16	19,145,232	28.8	121,383	157.75	19,564,200
Louisville - Lexington - Evansville	L-L-E	9	117	3,556,648	1.2	39,558	89.91	3,560,500
Memphis - Jackson	MEM-	11	94	3,465,226	1.3	55,035	62.96	3,470,900
Miami - Fort Lauderdale	MIA-	5	13	5,136,581	32.1	15,654	328.13	5,250,500
Milwaukee	MLW	16	66	4,541,432	3.6	50,849	89.31	4,558,600
Minneapolis - St. Paul	MPLS-	23	211	5,986,039	5.1	224,580	26.66	6,022,400
Nashville	NASH	3	43	1,767,391	11	18,581	95.12	1,783,200
New Orleans - Baton Rouge	N.O.-	13	67	4,925,269	4.1	50,189	98.13	4,927,700
New York	N.Y.	20	94	26,410,597	3.7	65,447	403.54	26,534,800
Oklahoma City	O.C.	8	50	1,877,478	3.6	43,276	43.38	1,873,200
Omaha	OMA	7	90	1,859,273		69,172	23.99	1,860,400
Philadelphia	PHIL	11	37	8,927,748	5.3	20,271	440.42	8,990,100
Phoenix	PHOE	7	13	3,510,140	34.6	89,308	39.30	3,581,100
Pittsburgh	PGH	12	42	4,102,766	-7.2	23,132	177.36	4,083,000
Portland	POR	9	35	3,059,948	9.3	82,421	37.13	3,086,600
Richmond - Norfolk	RICH-	7	99	3,846,210	11.2	29,542	130.19	3,884,200
St. Louis	ST.L	12	103	4,663,928	3.1	60,849	76.66	4,683,800
Salt Lake City	S.L.C.	8	86	2,573,372	14.5	163,858	15.70	2,592,100
San Antonio	SANT	6	40	2,966,524	19.9	47,877	62.38	3,026,500
San Francisco - Oakland - San Jose	SF-O-SJ	13	58	11,891,177	23.3	149,871	79.34	12,110,000
Seattle	SEAT	11	46	4,377,218	22.6	661,116	6.62	4,440,700
Spokane - Billings	SPOK-	11	88	1,863,335	2.5	215,292	8.65	1,861,200
Tampa - St. Petersburg - Orlando	T-SP-O	7	20	5,417,788	38.1	18,623	290.92	5,543,000
Tulsa	TUL	4	20	1,096,396	4.9	15,130	72.47	1,097,500
Washington - Baltimore	WASH-	9	67	7,777,875	15.5	21,323	364.76	7,882,300
Wichita	WICH	8	66	1,124,174	2.5	59,146	19.01	1,125,200
Totals / Averages				248,709,873				250,812,200

EXHIBIT B

900 MHz Height-Power Comparison

Authorized vs Proposed

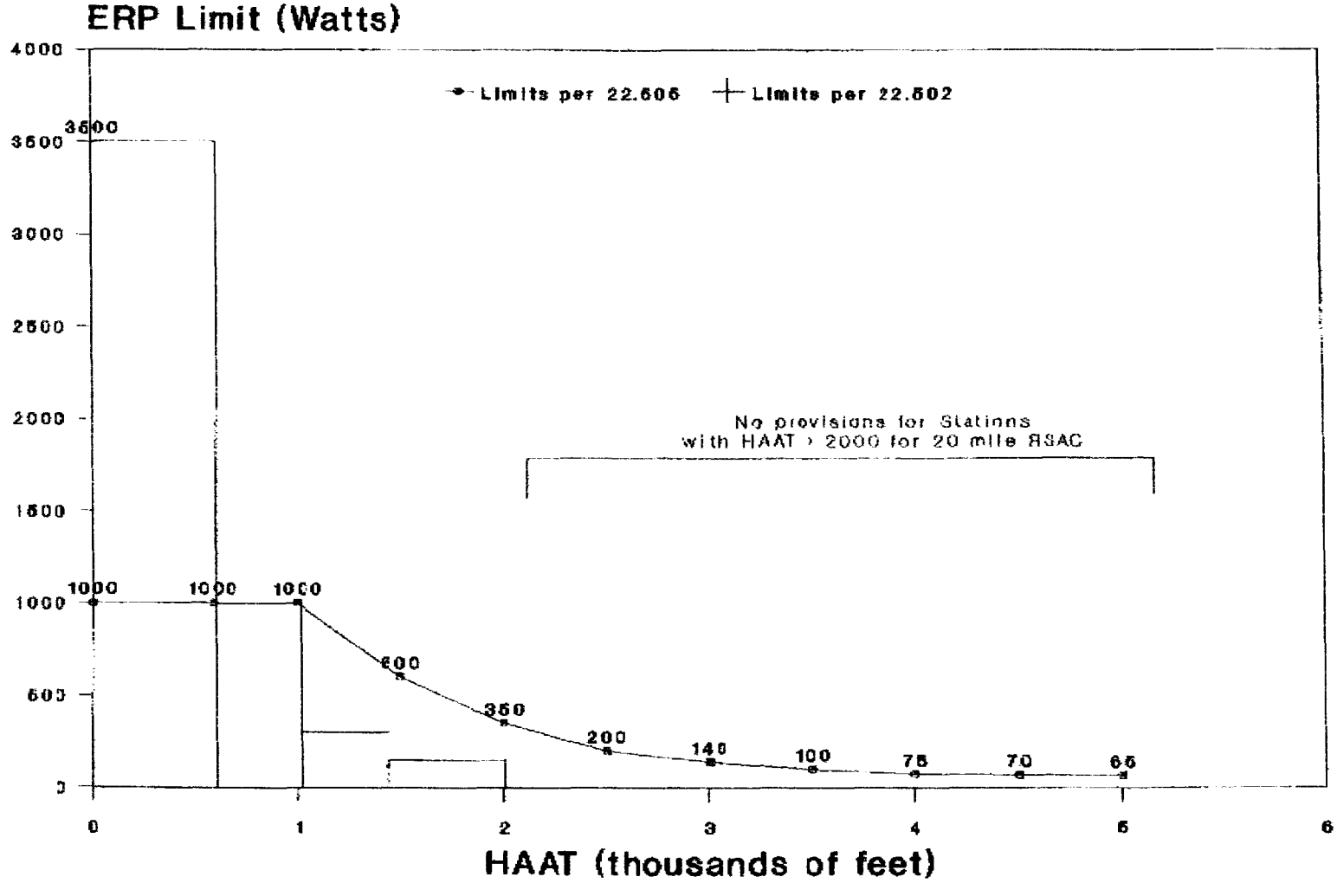


EXHIBIT C

900 MHz Service Contour as a Function of Height & Power

Formula:

$$d(km) = 1.36 \times (\text{height-meters})^{0.335} \times (\text{power-Watts})^{0.175}$$

Table:

Height (m)	Height (ft)	Power (W-erp)	Contour (km)	Contour (mi)
177.08	581	3500	32.13	19.96
182.87	600	3300	32.14	19.97
213.35	700	2400	32.01	19.89
243.83	800	1900	32.14	19.97
274.31	900	1500	32.07	19.93
304.79	1000	1000	30.95	19.23
335.26	1100	920	31.49	19.57
365.74	1200	840	31.91	19.83
396.22	1300	760	32.21	20.02
426.70	1400	680	32.38	20.12
457.18	1500	600	32.42	20.15
487.66	1600	550	32.63	20.28
518.13	1700	500	32.75	20.35
548.61	1800	450	32.77	20.36
579.09	1900	400	32.69	20.31
609.57	2000	350	32.49	20.19
640.05	2100	320	32.51	20.20
670.53	2200	290	32.46	20.17
701.01	2300	260	32.32	20.08
731.48	2400	230	32.09	19.94
761.96	2500	200	31.74	19.73
792.44	2600	188	31.82	19.77
822.92	2700	176	31.85	19.79
853.40	2800	164	31.85	19.79
883.88	2900	152	31.80	19.76
914.36	3000	140	31.70	19.70
944.83	3100	132	31.72	19.71
975.31	3200	124	31.71	19.71
1005.79	3300	116	31.67	19.68
1036.27	3400	108	31.59	19.63
1066.75	3500	100	31.47	19.56
1097.23	3600	95	31.49	19.57
1127.70	3700	90	31.48	19.56
1158.18	3800	85	31.45	19.54
1188.66	3900	80	31.39	19.50
1219.14	4000	75	31.30	19.45
1249.62	4100	74	31.48	19.56
1280.10	4200	73	31.66	19.68
1310.58	4300	72	31.84	19.78
1341.05	4400	71	32.00	19.89
1371.53	4500	70	32.17	19.99
1402.01	4600	69	32.32	20.08
1432.49	4700	68	32.47	20.18
1462.97	4800	67	32.62	20.27
1493.45	4900	66	32.76	20.36
1523.93	5000	65	32.89	20.44