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## SUMMARY

Fleet Call, Inc. ("Fleet Call") encourages the Federal Communications Commission (the "Commission") to create a regulatory framework for Personal Communications Services ("PCS") that allows PCS licensees to innovate, compete and develop diverse service offerings that meet the needs of mobile communications users. This will facilitate creation of a PCS "family" of mobile and portable communications services for individuals and businesses.

Fleet Call has substantial expertise in providing innovative mobile communications services. As one of the leading licensees of Specialized Mobile Radio ("SMR") systems, Fleet Call and its subsidiaries provide dispatch and interconnected mobile communications to approximately 136,000 users daily on both 800 MHz and 900 MHz SMR systems.

Moreover, Fleet Call is creating advanced, spectrally-efficient, wide-area digital mobile communications systems. Fleet Call conceptualized and is constructing Enhanced Specialized Mobile Radio ("ESMR") systems in six of the largest markets in the country: Chicago, Dallas, Houston, Los Angeles, New York and San Francisco. These systems incorporate state-of-the-art Time Division Multiple Access ("TDMA") transmission and frequency reuse to yield in excess of 15 times the customer capacity of existing SMR systems while providing improved transmission quality and enhanced services. Fleet Call's first ESMR system will be operational in Los Angeles in the summer of 1993.

The Commission can best achieve its PCS objectives by licensing five PCS providers in each Metropolitan Statistical Area and Rural Service Area market. Four of the licensees would receive exclusive use of 15 MHz in each market and the fifth would receive a 30 MHz assignment. The Commission should pursue Congressional authority to employ competitive bidding procedures for the 30 MHz licensee and, optimally, for all PCS licensees.

Competitive bidding is particularly appropriate for selecting PCS licensees. Thousands of applicants intend to seek PCS authorizations. Comparative hearings are prohibitively costly, time-consuming and administratively burdensome in such circumstances. Lotteries inevitably invite massive speculation and filing abuses and there is little likelihood that the Commission can fashion lottery "reforms" that would solve these problems. Competitive bidding will be far more effective in controlling speculation, rewarding sincere applicants and assuring that spectrum is expeditiously licensed to bona fide PCS providers.

Each PCS licensee should be free to determine, at the time of licensing, whether to operate on a private carrier or common carrier basis. This is consistent with allowing PCS licensees maximum flexibility to develop the widest range of services.

Finally, the Commission should confirm that not only PCS, but all mobile communications providers, have a federally protected right to interconnection with the public switched telephone network.

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

In the Matter of )  
 ) Gen. Docket No. 90-314  
 ) ET Docket No. 92-100  
Amendment of the Commission's Rules )  
to Establish New Personal ) RM-7140, RM-7175, RM-7617,  
Communications Services ) RM-7618, RM-7760, RM-7782,  
 ) RM-7860, RM-7977, RM-7978,  
 ) RM-7979, RM-7980  
 )  
 )  
 ) PP-35 through PP-40, PP-79  
 ) through PP-85

To: The Commission

COMMENTS OF FLEET CALL, INC.

I. Introduction

Fleet Call, Inc. (Fleet Call), pursuant to Section 1.405 of the Rules and Regulations of the Federal Communications Commission (the "Commission"), respectfully provides its Comments in response to the above-captioned Notice of Proposed Rulemaking (the "Notice") concerning a comprehensive regulatory structure for Personal Communications Services ("PCS") in the United States.<sup>1/</sup>

As a leading licensee of Specialized Mobile Radio ("SMR") systems, Fleet Call and its subsidiaries provide mobile communications services to approximately 136,000 mobile units on a daily basis on both 800 MHz and 900 MHz SMR systems. Fleet Call provides mobile communications services that help Americans do their jobs more efficiently and effectively.

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<sup>1/</sup> FCC 92-333, released August 14, 1992.

Fleet Call is also a leader in developing advanced, highly-efficient, wide-area digital mobile communications systems. It conceptualized and is constructing Enhanced Specialized Mobile Radio ("ESMR") systems in six of the largest metropolitan areas in the country.<sup>2/</sup> These systems incorporate state-of-the-art technology, including digital speech coding, Time Division Multiple Access ("TDMA") transmission and frequency reuse to yield in excess of 15 times the customer capacity of existing Specialized Mobile Radio ("SMR") systems while providing improved transmission quality and enhanced services. Fleet Call's first ESMR system will be operational in Los Angeles in the summer of 1993.

Fleet Call has been an active participant in the Commission's consideration of PCS since the initial Notice of Inquiry concerning the need for and alternative ways to provide new personal communications services.<sup>3/</sup> Fleet Call is constructing advanced, digital mobile communications systems using technology that offers an optimum platform for PCS-type services.<sup>4/</sup> Accordingly, Fleet Call has expertise in the issues under consideration in this

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<sup>2/</sup> On February 13, 1991, the Commission authorized Fleet Call to construct and operate 800 MHz ESMR systems in Chicago, Dallas, Houston, Los Angeles, New York and San Francisco. See In Re Request of Fleet Call, Inc. for Waiver and Other Relief to Permit Creation of Enhanced Specialized Mobile Radio Systems in Six Markets, 6 FCC Rcd 1533 (1991) (the "Fleet Call Waiver Order"), recon. den. 6 FCC Rcd 6989 (1991).

<sup>3/</sup> Gen. Docket No. 90-314, 5 FCC Rcd 3995 (1990). See Comments of Fleet Call, Inc., filed October 1, 1990; Reply Comments of Fleet Call, Inc., filed January 15, 1991.

<sup>4/</sup> Fleet Call is an applicant for a PCS pioneer's preference. See Request for a Pioneer's Preference, Gen. Docket. No. 90-314, filed May 4, 1992.

proceeding and hereby offers its Comments.

## II. BACKGROUND

The Commission observes that there is a steadily increasing consumer and business interest in new mobile communications services and technologies it believes cannot be fully accommodated by existing mobile communications providers within their current allocated spectrum.<sup>5/</sup> It concludes that PCS will increase productivity and efficiency in many industries and improve the international competitiveness of U.S. communications manufacturers. The Commission states that the advent of PCS will have a great impact on the future development and configuration of all telecommunications networks through improving their flexibility and functionality.<sup>6/</sup>

Accordingly, the Notice proposes establishing a new personal communications service to provide new and innovative services to meet the public's desire for mobile and portable communications. The Commission proposes to define PCS as a ". . . family of mobile or portable radio communications services which could provide services to individuals and business, and be integrated with a variety of competing networks."<sup>7/</sup> The Commission's objective in this rulemaking is to allocate sufficient spectrum for a PCS service and establish rules to facilitate the widest possible range

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<sup>5/</sup> Notice at para. 25.

<sup>6/</sup> Id. at para. 4.

<sup>7/</sup> Id. at para. 29. Thus, the primary focus of PCS would be communications for people on the move.

of such services.

The Notice sets forth a comprehensive set of questions rather than proposals covering, among other things, a spectrum allocation for PCS, alternative definitions of PCS service areas, the number of providers for each market or service area, the amount of spectrum that would be assigned to each provider, alternative licensing mechanisms, private carrier/common carrier considerations, a regulatory scheme for migrating existing fixed microwave users from the prospective PCS allocation, and various technical standards.

### III. DISCUSSION

#### A. PCS Service Area

The Commission tentatively concludes that PCS service areas should be larger than those initially licensed in the cellular service. The Commission notes that it granted cellular licenses in 734 metropolitan ("MSA") and rural ("RSA") service areas.<sup>8/</sup> Observing that cellular licensees have consolidated individual licensing areas to form larger service areas, it suggests that larger service areas may offer economies of scale and scope for PCS providers and may be desirable.<sup>9/</sup>

The Notice seeks comment on four PCS service area options: (1) the 487 "Basic Trading Areas" defined in the Rand McNally

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<sup>8/</sup> Id. at para. 56.

<sup>9/</sup> The Commission also suggests that the "transaction costs" of aggregating smaller service areas into larger ones may impose unnecessary costs and burdens on licensees and delay initiating service.

Commercial Atlas and Marketing Guide, plus Puerto Rico; (2) the 47 "Major Trading Areas" defined in the above Rand McNally publication, plus Alaska and Puerto Rico; (3) the 194 telephone LATAs; and (4) a nationwide service area. Each option offers trade-offs between maximizing the number of PCS providers, participation by smaller firms or firms with limited resources, and achieving the greatest economies of scale and scope.<sup>10/</sup> The Commission also ask for comment on licensing different spectrum blocks using different size service areas and using competitive bidding to determine the exact size of PCS service areas.

Fleet Call has reviewed these options and respectfully submits that PCS service areas should be licensed, like cellular, by MSA and RSA. The Commission's tentative conclusion that larger PCS service areas are more desirable draws an overbroad and unwarranted conclusion from the cellular experience without sufficiently considering that PCS is being created as a fundamentally different service. In contrast to cellular radio, which was designed as a largely vehicular high capacity common carrier mobile radio service,<sup>11/</sup> the Commission has consistently defined PCS in the broadest terms possible to assure that PCS providers have the greatest flexibility to design services responsive to the myriad

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<sup>10/</sup> Notice at paras. 60-61.

<sup>11/</sup> The overall cellular licensing structure (separate wireline and non-wireline allocation, size of the cellular allocation, market structure) was designed in response to the need to relieve the serious congestion that existed on conventional two-way mobile systems around the country. See Cellular Communications Systems, 86 FCC 2d 469 (1981).

and rapidly evolving communications needs of people on the move.<sup>12/</sup>

Indeed, in the instant Notice, the Commission's broad definition of PCS as a "family of mobile or portable radio communications services" contemplates a wide range of capabilities and technologies ranging from "wireless replacement for ordinary residential and office telephones to communication devices capable of sending and receiving voice and data to and from virtually anywhere."<sup>13/</sup> This definition presumes a licensing scheme that allows different licensees to develop a wide range of diverse PCS offerings in response to localized service needs.

As the Commission correctly observes, smaller service areas will permit broader participation by firms of all sizes in the PCS market -- including those interested in serving local areas that might otherwise not be served.<sup>14/</sup> The broader participation resulting from licensing PCS using smaller service areas can

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<sup>12/</sup> In 1988, the Commission liberalized its Rules to permit cellular carriers to use their assigned cellular spectrum to provide a broad range of "auxiliary" common carrier services, including services envisioned for PCS. See Amendment of Part 2 and 22 of the Commission's Rules to Permit Liberalization of Technology and Auxiliary Service Offerings in the Domestic Public Cellular Radio Telecommunications Service, 3 FCC Rcd 7033 (1988). The Commission has recently proposed further liberalization. See Amendment of Part 22 of the Commission's Rules to Provide for Filing and Processing of Applications for Unserved Areas in the Cellular Service and to Modify Other Cellular Rules, 7 FCC Rcd 3658 (1992). Unlike cellular, PCS is being created from the beginning to not only permit -- but encourage -- diverse service capabilities and service offerings.

<sup>13/</sup> Notice at para. 29.

<sup>14/</sup> Id. at para. 59.

produce greater diversity and technical and service innovation than is likely if PCS is implemented throughout larger service areas by a few large providers.

Fleet Call's experience in the SMR industry confirms that diversity will be particularly important during initial PCS implementation.<sup>15/</sup> The SMR regulatory scheme has permitted entrepreneurs to develop diverse service offerings and is largely responsible for the industry's rapid growth and success. A flexible PCS definition will similarly allow the marketplace to determine how the new PCS allocation is used locally, regionally and even nationally -- thereby promoting the most responsive services. Moreover, licensing cellular by MSA and RSA allowed providers to successfully implement service and build a customer base within their markets before turning their attention to wide area networks. This approach will assure the rapid and successful implementation of the desired "family" of PCS services.

B. Number of Licensees Per Service Area

The Commission desires to promote the widest range of PCS services at the lowest cost to consumers. It tentatively concludes that an allocation providing sufficient spectrum for at least three service providers in each market is necessary to ensure "a wide and rich range of PCS services that meet consumer needs at reasonable prices."<sup>16/</sup> It seeks comments on authorizing four or five PCS operators to provide additional competition and resultant benefits.

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<sup>15/</sup> Ibid.

<sup>16/</sup> Notice at para. 34.

The Commission's experience in licensing other mobile communications services is also instructive here. The SMR service was licensed on a "first-come, first-served" basis with no limitation on the number of licensees in a market (consistent with co-channel interference requirements). SMRs compete on price (service and equipment), options, features and quality and customer service. On the contrary, the Commission's decision to license only two cellular systems in each market has from the beginning been questioned on competitive grounds,<sup>17/</sup> and most recently has been the subject of Congressional inquiry.<sup>18/</sup> Some have suggested that PCS is a solution to the apparent lack of competition in the cellular industry.<sup>19/</sup>

With this background, and the Commission's desire to ensure a "rich range of PCS services," the public interest will be best served by licensing as many competitors as possible in each PCS market. Fleet Call supports authorizing five PCS operators per market. This will assure that the benefits of competition, i.e., lower prices, higher quality, greater innovation, and more diverse and customer-responsive service offerings, are realized. If the

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<sup>17/</sup> The Commission recognized that permitting only two licensees per market would offer only minimal facilities-based competition. Cellular Communications Systems at 475-477.

<sup>18/</sup> See Hearings Before the Subcommittee on Communications, Committee on Commerce, Science, and Transportation, United States Senate -- Hearing on Mobile Communications, July 1, 1992, Washington, D.C.

<sup>19/</sup> The Notice makes clear that the Commission views PCS as being competitive with existing mobile communications services including cellular and SMR. See e.g., Notice at para. 63.

Commission believes that three operators will at least minimally accomplish its licensing goals, it is undeniable that five PCS operators will more certainly bring these benefits to the public.

C. Size of Assignments and Licensing Mechanism

Given the Commission's tentative conclusion to allocate 90 MHz for licensed PCS operations, Fleet Call supports granting four PCS licensees 15 MHz each of PCS spectrum in the identified 2 GHz bands. A fifth PCS licensee would receive 30 MHz, as discussed below.

Although the Commission proposes to grant three licensees 30 MHz each, a 15 MHz per licensee assignment would provide each licensee more capacity than today's analog cellular systems through using spectrum conserving technologies, such as six times analog Time Division Multiple Access technology. Some of the digital technologies being tested by PCS experimental licensees claim even more spectrum capacity. Moreover, the very nature of a PCS microcell configuration should enable highly-efficient frequency reuse further reducing the amount of spectrum required. Thus a smaller 15 MHz assignment facilitates competition by accommodating five operators per market within the proposed 90 MHz allocation while still providing expansive capacity.

Fleet Call believes that the public interest would be best served by assigning the remaining 30 MHz of the licensed PCS allocation in each market to a fifth licensee selected through

competitive bidding.<sup>20/</sup> Awarding the largest spectrum block through competitive bidding would prevent speculation and assure that the authorization goes to the entity that will put it to its highest, productive use. It would also generate substantial revenues for the United States Treasury by compensating the public for the use of valuable spectrum resources.

The Senate Staff Draft of the Spectrum Competitive Bidding Amendment to S. 218, "The Emerging Telecommunications Technologies Act of 1991" (the "Staff Draft") would allow the Commission to use competitive bidding licensing procedures for a two-year "test" period subject to continuing Congressional oversight through annual Appropriations Act confirmation. Competitive bidding would apply to initial licenses only and be limited to not more than 30 MHz of frequencies in up to three different services chosen by the Commission.

Competitive bidding is particularly well-suited for selecting PCS licensees. PCS is already one of the most eagerly anticipated new communications services in history. There is no doubt that many thousands of applicants will actively seek PCS authorizations. Choosing among competing mutually exclusive competing applicants in these circumstances using the Commission's existing licensing mechanisms -- comparative hearings and lotteries -- will not serve the public interest. Comparative hearings are costly, time-consuming and administratively burdensome -- prohibitively so with

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<sup>20/</sup> Fleet Call encourages the Commission to select all PCS licensees through competitive bidding.

large numbers of applicants.

Lottery selection is even less desirable. The Commission has used lotteries extensively in the common carrier, mass media and private radio services over the past seven years and has been unable to enforce standards or procedures effective in preventing widespread speculation. Lotteries inevitably invite massive speculation resulting in "private auctions" as lucky lottery selectees sell their licenses to the real service providers. Moreover, there is nothing new in the various suggestions in the Notice for "reforming" the lottery selection process and the Commission should recognize from its experience in the 220 MHz applications that using many of these measures failed to prevent speculation and application abuse.<sup>21/</sup> The fact is, as the Commission well knows, that speculation and filing abuse is unavoidable whenever the Government gives away for free the rights to exploit a scarce resource.<sup>22/</sup>

For these reasons, the Commission should continue to pursue

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<sup>21/</sup> There were nearly 58,000 applications for the 220 MHz local authorizations.

<sup>22/</sup> While a very high filing fee might deter some speculators, even the approximately \$3 million fee used in the example in paragraph 89 of the Notice would be a small price for a nationwide 30 MHz PCS license. In any case, creative applicants can "get around" even significant application fees by creating partnerships or joint ventures in which the participants share the application costs. Moreover, the Commission's authority to impose and collect filing fees is limited by statute and does not authorize non cost-based charges for the purpose of discouraging applications. Competitive bidding, on the other hand, would return a market price to the people of the United States for granting a private entity the right to profit from using a public resource, and is therefore preferable to imposing arbitrary fees.

Congressional authorization to adopt competitive bidding procedures for PCS authorizations.<sup>23/</sup> This licensing mechanism would be far more effective than lotteries in controlling speculation, rewarding sincere applicants and best assuring that the new PCS spectrum is expeditiously assigned to bona fide PCS providers.

D. Regulatory Structure

The Commission also asks for comment on whether PCS should be classified as a common carrier or private land mobile radio service.<sup>24/</sup> Fleet Call concurs that PCS is in an evolving state; a variety of services are likely to be developed under the PCS umbrella some of which may be better characterized and implemented as private land mobile services and some as common carrier land mobile services.<sup>25/</sup>

As currently defined and regulated, there are respective advantages and disadvantages to both common carrier and private land mobile carrier regulation. As these services evolve over time, these characteristics are likely to change. One regulatory structure or the other could better enable a PCS provider to initiate and develop a particular service offering.

Accordingly, PCS licensees should be permitted to select -- at

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<sup>23/</sup> The Commission compares its licensing alternatives -- comparative hearings, lotteries and competitive bidding -- and concludes that competitive bidding will more quickly assign a license to the user who values it most, reduce the Commission's cost of administering selections and, most importantly, reduce the real private resources expended in the licensing process. See Notice at Appendix D.

<sup>24/</sup> Notice at para. 95.

<sup>25/</sup> Id. at para. 98.

the time of license grant -- whether to offer service under that license on a common carrier or private carrier basis. This approach is consistent with the Commission's objective of allowing PCS licensees maximum flexibility to develop the widest range of services at the lowest costs to their customers. It would permit the PCS licensee to deliver a particular service under whichever regulatory approach is most advantageous for that service -- be it private carrier or common carrier. Fleet Call would not, however, permit a licensee to operate as both a private and a common carrier in a single market.

E. Interconnection

The Notice proposes that the Commission confirm that PCS licensees have a federally protected right to interconnection with the public switched telephone network ("PSTN").<sup>26/</sup> The Commission's intent is to ensure that PCS providers are not discriminated against by the local exchange telephone companies ("LECs") who continue to have a bottleneck monopoly over access to the local telephone network. This is a significant consideration, given the Commission's objective that PCS licensees provide mobile communications services in competition with LEC-affiliate cellular carriers, and in some cases, the LECs themselves.<sup>27/</sup>

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<sup>26/</sup> Id. at para. 99.

<sup>27/</sup> Arguments have been made for limiting the eligibility to be PCS licensees of those carriers with monopoly control of the local exchange telephone network. Fleet Call believes that it is not necessary to adopt such restrictions at this time. The Commission should, however, monitor the LEC's offering of non-discriminatory interconnection with the PSTN to determine if such restrictions become warranted.

Fleet Call supports the Commission's proposal, provided that it confirms the rights of all mobile communications carriers to interconnection with the PSTN. The Commission should expressly provide that all mobile communications carriers are entitled to obtain interconnection with the PSTN that is reasonable for their particular systems, and that is no less favorable than that offered by the LEC to any other service provider for comparable interconnection services.

The Commission also proposes preempting state or local regulation of the types of interconnection available to PCS licensees.<sup>28/</sup> Fleet Call supports this as well, provided that the Commission confirm preemption of state or local regulation of the kinds or types of interconnection available to all mobile communications providers. These actions are in the public interest as they would assure that PCS and other mobile communications licensees can obtain necessary interconnection facilities on a non-discriminatory basis -- thereby facilitating initiation of federally-authorized services.<sup>29/</sup>

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<sup>28/</sup> Notice at para 103. Section 332(c)(3) of the Communications Act of 1934, as amended, preempts any state or local rate or entry regulation of any private land mobile service.

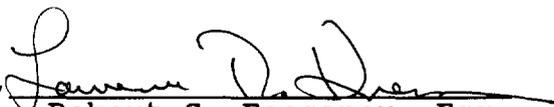
<sup>29/</sup> The Commission tentatively concludes that it need not preempt at this time state and local regulation of the rates charged by the LECs for interconnection with the PSTN. Notice at para. 103. The Commission should, however, be prepared to preempt state or local regulation of such rates if applied so as to thwart or impede the effective provision of federally-authorized communications services.

**IV. CONCLUSION**

Fleet Call supports the Commission's efforts to implement a PCS regulatory structure that provides maximum flexibility for PCS licensees to innovate, compete and develop services that meet the needs of mobile communications users. The Commission can best achieve this objective by licensing five PCS providers in each MSA/RSA market. Four of the licensees would receive exclusive use of 15 MHz in the market and the fifth would receive a 30 MHz assignment. The Commission should employ competitive bidding procedures for the 30 MHz license and optimally for all PCS licenses. Each PCS licensee would be free to determine, at the time of licensing, whether to operate on a private carrier or common carrier basis. Finally, the Commission should confirm that all mobile communications providers have a federally protected right to interconnection with the PSTN.

Respectfully submitted,

FLEET CALL, INC.

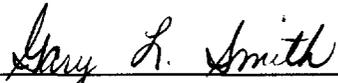
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Dated: November 9, 1992

CERTIFICATE OF SERVICE

I, Gary L. Smith, hereby certify that copies of Fleet Call, Inc.'s Comments were sent on this, the 9th day of November, 1992, by first class United States mail, postage prepaid, to those listed on the attached sheets.

  
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