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November 12, 1992

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Vanguard Cellular Systems, Inc.
GEN Docket No. 90-314
ET Docket No. 92-100
SUPPLEMENT TO COMMENTS FILED NOVEMBER 9, 1992

Dear Ms. Searcy:

Vanguard Cellular Systems, Inc. ("Vanguard"), by its attorneys, hereby transmits an original and six copies of a Declaration of Robert Shaw, RF Systems Engineer for Vanguard. Vanguard's Comments in the above-referenced Rule Making include a copy of Mr. Shaw's Declaration with a telecopied signature page. The Declaration transmitted with this letter contains Mr. Shaw's original signature.

No filing fee is associated with this supplement.

Vanguard respectfully requests that the Commission associate this Declaration with Vanguard's Comments. Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

Michael D. Basile

Michael D. Basile

MDB:taf
Enclosure

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Federal Communications Commission
Office of the Secretary

DECLARATION

I, Robert Shaw, do hereby state under penalty of perjury, that the following is true and correct:

1. I am RF Systems Engineer for Vanguard Cellular Systems, Inc. ("Vanguard") and have held that position since September 1990. In that position, I oversee cellular system engineering design and operation of many of Vanguard's 21 cellular telephone systems which serve approximately 90,000 subscribers throughout the eastern United States.

2. Prior to working for Vanguard, I was an engineer concentrating on private microwave frequency coordination matters at Comsearch in Reston, Virginia, from August 1989 to September 1990.

3. From May 1987 to September 1989, I was an engineer in the FM Radio Branch, Federal Communications Commission ("FCC").

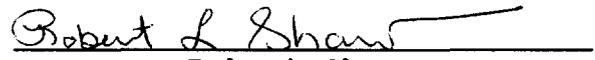
4. I received by B.S. degree in Electrical Engineering from the University of Pittsburgh in 1987.

5. I am familiar with the proposals of the FCC relating to allocation of spectrum for personal communications services ("PCS") in GEN Docket No. 90-314 and ET Docket No. 92-100.

6. Based upon my experience in mobile telephony, it is my opinion that an allocation of 20 MHz in the 1.8 GHz band for a PCS license is more than sufficient to permit design and implementation of a system providing PCS services. PCS systems will experience much greater frequency efficiencies through use of digital modulation technologies than current analog cellular systems.

7. Furthermore, through utilization of a microcellular design and reduced power level from end user units, the PCS systems will inherently benefit from increased frequency reuse. Finally, the increased free space path loss resulting from the higher frequency band will permit greater channel reuse by reducing adjacent channel interference levels.

8. It is my opinion that a PCS licensee operating with 20 MHz of bandwidth in the 1.8 GHz range will effectively be in a position to provide the same array and quantum of services that a cellular operator can provide in the 800 MHz band with 25 MHz bandwidth. This is especially so if there is a spectrum reserve for PCS in the 1.8 GHz band.


Robert Shaw

Date: November 6, 1992