

diverse service offerings, (5) superior technical ability, and (6) pioneer preferences (15-17).

**Regulatory status:**

- The Commission should declare that PCS providers have a co-carrier status with local exchange carriers, the federally-protected right of interconnection to all common carriers that includes the right to their own telephone numbers, the right to participate in settlement processes with other telephone companies, and the federally-protected right of interconnection at the Class V level as equals. These interconnection policies should also be extended to the cellular industry (20-22).
- Equal access should be required of all PCS carriers (22-23).
- All PCS licensees should be regulated as common carriers (23-24).
- The Commission need not address the issue of preemption of state regulation at this stage (24-25).

**Technical standards:**

- Each consortium licensed would set national specifications for PCS equipment and system design, thereby ensuring compatibility and roaming capabilities (10-11).
- The Commission should require interconnection between the three national systems as well as interconnection with other common carrier networks (11).

**METROCALL OF DELAWARE, INC.**  
Comments on 2 GHz Licensed PCS

**Interest:** Provider of mobile services.

**Band plan:**

- No separate allocation for wireless local loop services is warranted. (pp. 5-6).

**Service areas:**

- PCS service areas should not be national or based on LATAs because this forecloses market entry opportunities, discourages diversity and fails to reflect marketplace realities. (pp. 7-9).

**Cellular carrier participation:**

- PCS licenses should not be held in common with cellular licenses, as this will thwart the implementation of PCS. (pp. 6-7).

**Licensing policies:**

- Supports the proposed 10 year licensing term because investment will be encouraged. (p. 9).
- FCC should adopt lottery reforms to deter speculation, including stringent financial qualifications, construction deadlines, and filing fees. (pp. 9-11).

**Regulatory status:**

- To assure that a level regulatory playing field is established for all PCS operators, the FCC should adopt the Telocator flexible service concept for PCS, equal rights to interconnection with the PSTN, and allow an applicant to select its carrier status. (pp. 13-14).

**Technical standards:**

- Technical standards for PCS should be determined by industry standards groups as the need arises. (p. 16-18).
- Urges FCC to authorize reasonably higher power limits, as suggested in the Notice, to serve rural and low population areas; 7-10 watts ERP for mobile units, 500 watts ERP base station, and up to 25 watts ERP for digipeaters. (p. 17).
- A standard common air interface is critical to PCS achieving its market potential. (p. 18).

0 0095

- Digipeater rules should provide operators maximum flexibility, and the antenna standards should be similar to the control station rules in Part 90. (pp. 18-19).

**MOTOROLA, INC.**  
Comments on 2 GHz Licensed PCS

**Interest:** Equipment manufacturer.

**Band plan:**

- Proposes an alternative PCS band plan for 1.8 GHz, composed of 5 blocks. (p. 9)

<u>BLOCK</u>	<u>SPECTRUM SEGMENT (MHz)</u>
A	1850-1870/1930-1950
B	1870-1890/1950-1970
C	1890-1900
D	1900-1910
E	1910-1930

- Blocks A and B should be paired segments, 40 MHz per operator, providing wide area, ubiquitous PCS public access services.
- Block C should be an unpaired 10 MHz segment shared by two licensees.
- Block D should also be an unpaired 10 MHz segment shared by multiple licensees or to expand the spectrum proposed for nonlicensed PCS.
- Block E should be an unpaired 20 MHz segment for nonlicensed PCS, as proposed by the FCC.

**Licensing policies:**

- Believes expedited comparative hearings may be the best mechanism for license assignments. (p. 44)
- If lotteries are ultimately used, Motorola recommends the imposition of filing fees; demonstration of market-specific financial qualifications; minimum construction deadlines; rejection of mass produced engineering proposals; demonstration of reasonable assurance of site availability; and a prohibition on interests in multiple applications for the same area. (p. 44)

**Technical standards:**

- Concurs with the FCC's decision not to adopt a single transmission standard for PCS but emphasizes that interoperability is essential for consumer acceptance. (p. 24)

- To achieve universality, the FCC should require that only approved standardized CAIs be used for 1.8 GHz PCS. (p. 24)
- Supports the continued use of the IEEE/ANSI standard by the FCC for determining potential RF hazards. (p. 29)
- Believes that many OFS systems may receive excessive protection from the FCC's requirements, which may adversely affect the ability of PCS services to share spectrum with fixed services as well as spectrum sharing between OFS systems. (p. 35)
- Recommends modifications to the Commission's proposals for calculating PCS interference potential to fixed microwave receivers. Specifically:
  - Recommends modifications to the proposed method of aggregating the interference potential from the base, mobile, and portable PCS sources. (pp. 36-37)
  - Also recommends that a probability term be factored into the calculation of the expected number of PCS units to be in operation at any given time. (p. 37)
  - Encourages and supports an industry-based initiative to develop necessary PCS-to-microwave propagation models. (p. 38)
- Submits a revised PCS/fixed microwave coordination table that establishes coordination distances for base stations operating with powers as low as one watt (EIRP) at a height of 5 meters. (p. 39)
- Disagrees with the FCC's continued reliance on Carey curve derivations to predict signal coverage -- believes the use of the Hata propagation model and more current CCIR recommendations would be more appropriate. (pp. 39-40)

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**NATIONAL ASSOCIATION OF BROADCASTERS**  
Comments on 2 GHz Licensed PCS

**Interest:** Association of radio and television broadcast stations  
and networks

**Band plan:**

- Reiterates its support for the Commission's decision not to include the 1.99-2.11 GHz broadcast auxiliary band in the frequencies to be made available for PCS. (p. 1)
- Current ENG demand in this band fully occupies the available spectrum. (p. 3)
- Spectrum sharing is impracticable. (p. 4)
- Relocating these uses to other bands is not a viable option. (pp. 4-6)

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**NATIONAL ASSOCIATION OF BUSINESS AND EDUCATIONAL RADIO, INC.**  
Comments on 2 GHz Licensed PCS

**Interest:** Trade association and frequency coordinator  
representing private radio interests

**Regulatory status:**

- PCS should be regulated as private carriage or PCS providers should be permitted to elect their regulatory status. (pp. 3-5)

**Technical standards:**

- Supports federally protected right to interconnection on terms no less favorable than that accorded to any other customer or carrier. (pp. 5-6)

**NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS**  
 Comments on 2 GHz Licensed PCS

**Interest:** Association of state utility commissions

**Regulatory status:**

- PCS falls under definitional classifications:
  - Personal communications services described in the NPRM are "intrastate" in nature. (pp. 3-4)
  - PCS is a "mobile" service. (p. 5)
- Section 332 determines the regulatory status of a mobile service, and Section 332 applies a functional test. (pp. 5-6)
- PCS is common carrier under Section 332. (pp. 7-11)
  - PCS requires "provision of telephone service or facilities of a common carrier. . ." as part of the offering. (p. 7)
  - Congress specifically noted cellular systems were common carrier. (p. 7)
  - The frequencies being allocated are not being allocated for dispatch services. (p. 8)
  - The FCC's current interpretation of Section 332 is faulty, and impermissibly blurs the distinction between private and common carriage. (pp. 8-9)
  - Attempting to classify PCS as private would plainly be contrary to Section 332. (p. 11)
- The FCC may not use its licensing powers to circumvent state regulation. (p. 12)
- The FCC may not preempt state regulation unless the inter- and intra-state components of the service are inseverable, state action negates the FCC's exercise of its authority over interstate service, and the FCC preemption order is narrowly tailored to preempt only the aspects of the particular state enactments that necessarily impedes valid federal regulation. (pp. 13-16)
- The FCC cannot preempt state regulation of PCS because: (1) in the absence of accurate service descriptions, preemption is premature (pp. 17-18); (2) there is no discussion of how state regulation poses any deleterious effects (pp. 18-19); and (3) no demonstration of inseverability has been made (p. 19).

**MANAGER OF THE NATIONAL COMMUNICATIONS SYSTEM**  
Comments on 2 GHz Licensed PCS

**Interest:**

- Federal Government office responsible for national security and emergency preparedness ("NS/EP") telecommunications. Attached to the comments are PCS service requirements as identified by the Federal Wireless-Service Users Forum and the Interagency Cellular Working Group.

**Amount of spectrum per licensee:**

- Supports allocating 15 MHz blocks of paired spectrum for 3-5 service providers. (Att. B-6)

**Service areas:**

- States that universality requirements dictate at least one but preferably 2 nationwide licensees. (Att. B-5)
- Recommends the use of the 49 major trading areas or the 194 LATAs for non-nationwide service areas. (Att. B-5)

**Regulatory Status:**

- Points out that private carriers are not required to participate in the Telecommunications Services Priority (TSP). The TSP benefits federal NS/EP efforts. (p. 6)
- Agrees with the FCC that PCS licensees should have a federally protected right to interconnection with the public switched telephone network. (p. 5)

**Technical Standards:**

- Argues that PCS interoperability and roaming are vital because Federal NS/EP telecommunications users must be able to use one type of equipment on a nationwide basis. Believes that nationwide licenses would help achieve interoperability and roaming capabilities. (p. 3,4)
- States that, at a minimum, all PCS providers should be required to interconnect with the public switched network. (p. 4)
- States that, ideally, PCS would be supported by a single common air interface. (p. 8)

**NATIONAL EMERGENCY NUMBER ASSOCIATION**  
Comments on 2 GHz Licensed PCS

**Interest:** Association concerned about the impact of PCS  
on 911 and E911 services

**Other:**

- Concerned about and studying the effects of cellular and PCS offerings on effectiveness of E911 service.
- FCC must enact ruling for PCS/PCN so that the financial burden for 911 service is shared by all users. (Letter, p. 2)
- NENA recommends that the Commission form an oversight committee of industry professionals to impose technical solutions for caller location identification issues. (p. 4)

**THE NATIONAL RURAL TELECOM ASSOCIATION AND  
THE ORGANIZATION FOR THE PROTECTION AND  
ADVANCEMENT OF SMALL TELEPHONE COMPANIES**  
Comments on 2 GHz Licensed PCS

**Interest:** Trade associations representing independent local exchange carriers serving primarily rural areas

**Band plan:**

- Commission should allocate sufficient spectrum to authorize five providers of service in each service area. (pp. 4-5) The greatest practical number of participants in PCS will encourage innovation and responsive service offerings, while promoting widespread availability of service. (p. 4)

**Amount of spectrum per licensed system:**

- Each provider should have a "viable" block of spectrum. (p. 5)

**Service areas:**

- Supports use of MSAs/RSAs. Smaller service areas will have many public interest benefits, including participation by a larger number of entities and introduction of PCS as quickly as possible across the nation, particularly in rural areas. (pp. 9-13)

**Local exchange carrier participation:**

- LECs should be permitted to seek PCS licenses, which will help to achieve the goals of universality and speed of deployment. (pp. 5-6) Granting LECs the opportunity to provide PCS will allow them to use whatever technology is most cost effective to serve their customers. (p. 6)
- A LEC's cellular holdings should not disqualify them from eligibility. (p. 7) PCS is different from cellular. (pp. 6-7) It is incorrect to assume that LECs with cellular interests already have spectrum to provide PCS in their service areas, since in most cases the interest is a minority ownership interest. (p. 7)
- The FCC should grant LECs the same size block of spectrum it grants to other providers. (p. 8)
- The Commission should reserve one of the five equal blocks of spectrum for service by small and rural LECs. The FCC should award the license for a geographic area equivalent to the other four licenses, but with the

requirement that each LEC would provide the PCS service in its own local exchange service area. (pp. 13-15)

**Licensing policies:**

- The Commission should employ lotteries, and should establish financial and technical qualifications, require timely construction, and explore other ways to discourage speculative applications (including requiring applicants to have some experience in telecommunications or a related field). (pp. 15-16)
- Employ a postcard lottery, with the requirement that detailed information be submitted shortly after the lottery. (p. 16)
- Opposes auctions, because they would exclude small and rural LECs. (p. 16)

**Regulatory status:**

- PCS, LEC, and cellular should all be subject to comparable regulation, which should be common carrier. Actual regulation should be light-handed. (pp. 16-18)
- Private carrier classification of PCS would improperly rob the states of their rightful authority over intrastate communications. (p. 17)

**Other:**

- States that PCS is basically local exchange service with a different technology. (p. 7)

**NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION**  
 Comments on 2 GHz Licensed PCS

**Interest:** Telecommunications policy advisor to the executive branch and federal spectrum manager

**Band plan:**

- If the FCC is to err, it should err on the side of too many providers, rather than too few. NTIA recommends at least three, and preferably four or five. (pp. 6-7)

**Amount of spectrum per licensed system:**

- NTIA believes the FCC should investigate allocating smaller blocks of spectrum. (p. 11)
- Each licensee should be able to subdivide their licenses or acquire portions of other licenses, as long as consolidation does not (for an initial period of 3 years) result in fewer than three providers. (p. 8)

**Service areas:**

- After weighing the pros and cons of larger and smaller service areas, NTIA rejects all of the FCC's proposals, including MSAs and RSAs, and suggests use of the 183 "economic areas" defined by the Department of Commerce's Bureau of Economic Analysis. (pp. 11-20)
- BEA areas generally consist of a central MSA and the surrounding areas that are economically related to the MSA through commuting patterns. (pp. 20-22)
- Licensees should be freely permitted to subdivide and transfer portions of BEA areas. (p. 22)

**Cellular carrier participation:**

- Cellular carriers should initially be excluded from obtaining licenses in-region for competitive reasons, although this policy should be reviewed after three years. (pp. 25-28).
- Overlaps could be dealt with either using a proportionate standard or by requiring the cellular licensee to transfer away PCS service subareas where it offers cellular service. (p. 27 n.45)

**Local exchange carrier participation:**

- Subject to structural safeguards addressing interconnection and installation practices, network disclosure, customer information, and cross-subsidization, LECs should be allowed

to participate in PCS except where barred by cellular affiliation. (pp. 29-32)

**Licensing policies:**

- FCC should seek auction authority and use auctions, since no proposal can "fix" the lottery process and auctions promote spectrum efficiency. (pp. 23-25)

**Regulatory status:**

- Regardless of regulatory classification, PCS should be subject to minimal regulatory oversight. (pp. 33-34)
- There is a question of law as to whether all PCS could be offered as private carriage under Section 332. (pp. 34-38)
- Classifying PCS as private carriage would have a number of desirable consequences -- preemption of state economic regulation, encouraging national standards, and ability to respond rapidly to market needs. (p. 39)
- The FCC should consider whether classifying PCS as private carriage would maintain appropriate regulatory parity with cellular. (pp. 39-40)
- If PCS is classified as common carriage, the FCC should not preempt state regulation at this time since it would be premature and severability would need investigation. (pp. 41-43)
- The FCC should preempt states with respect to the terms and conditions of interconnection, but not rates, to promote growth and development of PCS. (pp. 43-46)
- Supports revisions to the cellular rules to permit such carriers explicitly to offer PCS. (pp. 28-29)

**Other issues:**

- The FCC could, if it merely wants to provide additional competition to cellular, authorize more spectrum for that purpose; the objective here should be to encourage PCS to reach its full potential. (pp. 4-5)

**NATIONAL TELEPHONE COOPERATIVE ASSOCIATION**  
 Comments on 2 GHz Licensed PCS

**Interest:** A national association of small and rural local exchange carriers

**Band plan:**

- Five licenses should be awarded in any given area. (p. 8)

**Service areas:**

- Opposes large areas, including BTAs, and especially nationwide licensing, because that will delay initiation of service to rural areas and will eliminate most small exchange carriers from participation in providing PCS. Smaller areas will more closely reflect the expected evolution of PCS. (pp. 1-2)
- Commission should use MSAs and RSAs. (p. 3)

**Local exchange carrier participation:**

- The Commission should set aside a block of spectrum to permit small LECs to provide PCS in their service areas. (pp. 3-4) This set-aside would apply to each LEC in RSAs as well as each LEC with 50,000 subscribers in MSAs where LECs of that size provide telephone service. (p. 4)
- Limiting LECs to 10 MHz is inadequate. (p. 4)
- Opposes any limitation on LEC eligibility to provide PCS, including limitations that may result from cellular interests. (p. 4 n. 2)
- If Commission licenses multiple providers in each area, there is no reason to expect that licensing local exchange carriers in their service areas will deprive their customers of alternatives to wireline services or of the benefits resulting from competitive service offerings. (p. 8)

**Licensing policies:**

- Supports use of a postcard lottery. (p. 9)
- License term should be 10 years, with a renewal expectancy like that employed in cellular. (p. 9)
- Opposes auctions. (p. 9)

**Regulatory status:**

- PCS should be subject to minimal regulation, and should be classified as common carrier. (p. 10)

- Commission should seek amendment of Communications Act to provide that no state or local government may impose any rate or entry regulation on any provider of PCS services. This is necessary to place common carriers on equal footing with private carriers. (pp. 10-11)
- Supports liberalization of the cellular flexible rules. (p. 11)

**NEW YORK STATE DEPARTMENT OF PUBLIC SERVICE**  
Comments on 2 GHz Licensed PCS

**Interest:** State regulatory agency

**Band Plan:**

- Supports assignment of five PCS licenses per service area. If it is technically possible to accommodate more licenses at a future date, the FCC should award additional licenses. (pp. 5-6).

**Service Areas:**

- Urges the FCC to reconsider use of MSAs and RSAs as licensing areas to ensure broad participation by firms in the development of PCS. (pp. 6-8).

**Cellular carrier participation:**

- Cellular service providers should be eligible to apply for PCS licenses based on their ability to further the public interest. However, these providers should be required to demonstrate need for additional spectrum. (pp. 8-9).
- Opposes set-asides for cellular and cable TV companies as unjustified. (pp. 9-10).

**Local exchange carrier participation:**

- If a LEC can demonstrate that its existing cellular spectrum allocation is insufficient for the provision of PCS, then it should not be precluded from applying for a PCS license. (pp. 10-11).
- Opposes set-asides for LECs since this could restrict local exchange competition from non-LEC providers of PCS. (pp. 9-10).

**Regulatory status:**

- As described in the Notice, CT-2, CT-2 Plus, CT-3 and PCN resemble common carrier services; where PCS is connected to PSTN, it should be treated as a common carrier to the extent it is functionally equivalent to a common carrier. (pp. 13-16).
- PCS providers should be assured of interconnection arrangements that are comparably efficient to that offered by the LEC to its own affiliate. (pp. 15-16).
- FCC cannot determine that state policy on interconnection or PCS service will negate federal

goals. Such a determination is premature as a matter of fact and law. (pp. 17-19).

**Other:**

- The FCC should issue a Further Notice of Proposed Rulemaking to refine its proposals based on comments in this proceeding (pp. 4-5) and to address the privacy issues raised by PCS. (pp. 11-12).

**NORTH AMERICAN TELECOMMUNICATIONS ASSOCIATION**  
 Comments on 2 GHz Unlicensed PCS Devices

**Interest:** A trade association of more than 600 manufacturers, suppliers, distributors, and users of business telecommunications equipment

**Band plan:**

- 20 MHz is inadequate. Estimates suggest that at least 80 MHz is needed. (pp. 6-7)
- Additional spectrum is needed particularly in light of the spectrum proposed for allocation to licensed PCS systems. PCS currently will largely supplement and compete with cellular services, which already have 50 MHz of spectrum. To the extent they are not limited to this role, however, licensed PCS will compete with unlicensed PCS devices. (p. 7)
- If Commission is unwilling to allocate 80 MHz at this time, it should add the adjacent 15 MHz of spectrum at 1895-1910 MHz to the existing proposal for unlicensed PCS. (pp. 7-8)

**Channelization:**

- Questions the need for the detailed segmentation and channelization proposed for the unlicensed PCS spectrum. The effect may be to foreclose development of new technologies or limit possible uses. The technical rules should be as liberal as possible. (pp. 8-9)
- Commission should rely on development of etiquette by industry groups such as WINForum for sharing of spectrum by unlicensed devices. If feasible, the results of these efforts should be adopted in rules. (p. 9)
- There should be separate but contiguous unlicensed allocations for voice and high speed data devices, due to the disparate characteristics of these two types of transmissions. (pp. 9-10)

**Plan for relocation of existing users:**

- Agrees that unlicensed devices will need relatively clear spectrum. (p. 10) Supports Commission's proposal to require a somewhat more restrictive fixed microwave licensing policy with respect to the frequencies allocated for unlicensed PCS. (p. 10)
- There likely will be a need for a massive relocation of most or all fixed microwave users in the unlicensed PCS band. Accordingly, there will need to be some sort of

collective entity that can engage in negotiations and invoke the involuntary relocation procedures if necessary. Commission should consider establishing some sort of funding mechanism for that entity. Also, Commission will need to establish some sort of mechanism to determine whether the conditions for involuntary relocation have been satisfied (such as negotiated rulemaking or other alternative dispute resolution procedure). The Commission will have to take an active supervisory role. (pp. 12-13)

**Technical standards:**

- The proposed power output requirements appear unnecessarily restrictive and could exclude or hinder the use of certain technologies. (p. 9 n. 5)

**Other:**

- Based on wireline history, allowing unlicensed, unregulated customer-controlled systems is necessary to achieve the full benefits of PCS. (pp. 5-6)
- Commission should expeditiously adopted technical rules and authorize unlicensed PCS activity without waiting for all the decisions to be made on issues related to licensed PCS. (p. 6)

**NORTHERN TELECOM**  
Comments on 2 GHz Licensed PCS

**Interest:** Worldwide supplier of digital telecommunication switching systems

**Band plan:**

- Urges Commission to adopt "base" channelization plan to ensure uniformity, while still allowing PCS operators measure of flexibility. (p. 8). Provides a Spectrum Management Methodology (SMM) for use in licensed bands, that will provide means to ensure interoperability and mobility among licensed systems. (pp. 9-15).

**Amount of spectrum per licensed system:**

- Supports licensing three providers with allocation of 30 MHz each. (pp. 4-7).

**Cellular carrier participation:**

- Supports allowing cellular carriers to obtain PCS licenses outside their cellular service territories. (pp. 28-29).
- Believes that allowing cellular companies to offer PCS-type services on their current spectrum will promote competition in service areas. (p. 29). Supports Commission's proposal to amend cellular service rules to permit cellular carriers to provide PCS services in cellular spectrum. (p. 30).

**Local exchange carrier participation:**

- Supports giving local exchange carriers the opportunity in their existing franchise areas to obtain spectrum for provision of wireless loops. (p. 31). Believes that allowing LECs to provide licensed PCS outside of their service areas would increase the speed of deployment of PCS and enhance competition. (p. 31 n. 25).

**Regulatory status:**

- Asserts that licensed PCS providers should be classified as common carriers. (pp. 24-26).
- Supports Commission's view of preemption of state interconnection regulation, and urges adoption of federal interconnection policies to ensure market forces play a large role. (p. 26). Favors federally protected right of interconnection with public switched telephone networks. (p. 27).

- States that Commission should apply only minimal regulation because of high level of competition each PCS provider will face. (p. 26).

**Technical standards:**

- States that a combination of technical regulations and industry standards are necessary to support PCS applications. (p. 31).
- Asserts that Commission should encourage standards that permit the same units to be used in both licensed and unlicensed applications. (p. 34).
- Agrees that advisory committee is not necessary at this time. (p. 33).
- Recommends that the Commission modify its proposed coordination rules, and extrapolate coordination distances to derive appropriate values for low-power (<1W) and low antenna (<15m) systems. (pp. 36-37).

**NYNEX CORPORATION**  
Comments on 2 GHz Licensed PCS

**Interest:** Local exchange and cellular provider.

**Band plan:**

- FCC should authorize five licensees per market to encourage competition and a diversity of services. (pp. 26-27).

**Service areas:**

- Awarding nationwide licenses would work against the FCC's goals for competition, speed of delivery, and service diversity. (pp. 21-22).
- PCS service areas should mirror current cellular areas because PCS is a local service and consolidation of markets can occur as the need arises. (pp. 22-24).

**Cellular carrier participation:**

- Supports FCC's proposal to allow incumbent cellular carriers to be eligible for PCS licenses outside of their current service areas. (pp. 17-19).

**Local exchange carrier participation:**

- Supports allowing LECs to participate fully in the awarding of PCS licenses because carriers with established telecommunications infrastructures will deploy PCS rapidly to a wide range of customers. (pp. 8-17).
- FCC is mistaken that LECs with cellular affiliates do not need additional spectrum to provide PCS; cellular spectrum is insufficient for the provision of PCS. (p. i).

**Licensing policies:**

- An expedited comparative hearing process is the best way to choose initial PCS licensees because the FCC can ensure that licensees have adequate technical, financial and marketing expertise to deliver service to the public. (pp. 27-30).

**Regulatory status:**

- PCS should be classified as a common carrier service to foster competition on even terms with other service providers regulated as common carriers. (pp. 24-25).

**Technical standards:**

- Supports the FCC's proposal to permit significant flexibility in the development of technical standards and suggests that the FCC arrive at standards with the help of an industry advisory committee. (pp. 30-31).

**Other:**

- Appendix A: Report on LEC Role in PCS Market Development.

**OHIO LINX, INC.**  
Comments on 2 GHz Licensed PCS

**Interest:** Fiber-optic telecommunications operator.

**Service areas:**

- Believes smaller service areas would be more appropriate for most PCS uses and urges the FCC to consider adopting the 734 MSAs/RSAs used to determine cellular telephone service areas. (p. 5).

**Licensing policies:**

- Supports the use of lotteries as the licensing mechanism for PCS.
  - Recommends "letter perfect" application standards, narrow filing windows, and substantial application fees such as the \$6,760 fee authorized for the filing of comparative common carrier applications.
  - The FCC should require detailed engineering and business proposals and proof of financial resources within three days after selection of the tentative license. (pp. 6-7).
- Strict deadlines on construction and a three year holding period after construction and operation should be imposed. (p. 7).
- The use of competitive bidding would be contrary to the public interest. (p. 7).

**Other issues:**

- The public interest would be served by promoting the provision of PCS by smaller entrepreneurial companies. (pp. 3-4, 8).