Some commenters expressed concern that telephone companies will improperly cross-subsidize PCS development from monopoly service revenues.[59] However, the Commission has in place extensive accounting requirements, and state regulators exercise vigilant scrutiny over local service rates to prevent any abuses. A cross-subsidy from monopoly service revenues is therefore very unlikely to occur and certain to be detected if it were to occur. Moreover, as the Commission has previously found, non-structural safeguards are adequate to ensure that cross-subsidies from monopoly to competitive services will not occur.[60]

Concerns raised by some regarding potential LEC abuses of telephone numbering assets[61] are also without merit. The Commission is well-situated to ensure that appropriate policies are adopted for PCS numbering and that PCS licensees have nondiscriminatory access to numbers.[62]

Some parties have also suggested that telephone companies will have an incentive to thwart the development of PCS as a competitive alternative to wireline service.[63] This very argument was made in the cellular rulemaking a decade ago — "that cellular technology might have developed the potential to be competitive with local exchange service, thereby creating a disincentive on the part of wireline carriers to fully develop cellular service. . . ."[64] This argument was found wanting then[65] and it continues to lack merit.

59/ *See, e.g.*, Comments of Cox at 18-19; Comcast PCS Communications, Inc. at 12.

60/ *See In the Matter of Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier 1 Local Exchange Company Safeguards, Report and Order,* 6 FCC Rcd. 7571, 7577 at n.11 (1991).

61/ *See, e.g.*, Comments of Cox at 18; Comcast at 15.

62/ The Commission has recently held that it has "plenary jurisdiction" over the North American Numbering Plan ("NANP") and has initiated a *Notice of Inquiry* into its administration. *Administration of the North American Numbering Plan,* CC Docket 92-237, *Notice of Inquiry,* FCC 92-470 at ¶ 6 (Oct. 29, 1992). Bellcore, which currently administers the NANP, has developed draft guidelines for the assignment of office codes, and the Commission will be considering these recommendations and industry comments in the course of its proceeding. *Id.* at ¶ 15. Moreover, the Commission has specifically sought comment on possible actions it might take regarding the NANP as it relates to PCS numbering issues. *Id.* at ¶ 40.

63/ *See, e.g.*, Comments of Cox at 3.

64/ *Cellular Communications Systems, CC Docket 79-318, Report and Order*, 86 FCC 2d 469, 483 (1981), *recon. in part,* 89 FCC 2d 58 (1982), *further recon.*, 90 FCC 2d 571 (1982), *appeal dismissed sub nom. United States v. FCC,* No. 82-1526 (D.C. Cir. 1983).

65/ 86 FCC 2d at 484.

In a competitive environment, one of several competitors cannot alone hold back the potential of PCS to compete with landline service, even if it tries. While it is unclear at this time whether PCS will be a cost-effective alternative local access technology, if it is, then PCS licensees will surely see that it develops its full competitive potential. If the local exchange carriers are licensees as well, they will be subject to the pressures of competition and will have every incentive to make their own PCS operations profitable by pursuing customer opportunities that are being pursued by their competitors.

A last objection to telephone company eligibility is based on LEC access to telephone customers and proprietary information regarding customer network usage.[66] However, such concerns certainly do not warrant the exclusion of telephone companies. Commenters failed to demonstrate any competitive advantage that LECs might have as a result of their access to this information. Moreover, even if such access was deemed to be a legitimate concern, the Commission has extensive experience in the development of appropriate safeguards and could easily utilize existing nonstructural safeguards for ONA to address such matters. To exclude the local exchange carriers from eligibility instead of adopting an appropriately targeted remedy for a potential competitive concern would forego the substantial benefits of telephone company participation for no reason.

In sum, it is clear from the filings of the Justice Department, NTIA, and OPP that telephone companies should be eligible for PCS licenses, subject to nonstructural safeguards where needed. As NTIA aptly stated:

> The absence of spectrum set-asides, and the implementation of effective nonstructural safeguard plans by eligible LECs, will promote the growth of competitive PCS markets.[67]

Local exchange carriers will help to make PCS successful, innovative, and widely available. Their exclusion from PCS licensing would be unwarranted.

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[66] *See* Comments of Comcast at 15; Cox at 18.

[67] NTIA Comments at 32.

D. Denying Cellular Eligibility Subject to Later Reevaluation Would Not Serve the Public Interest

NTIA and the Department of Justice have both suggested that the Commission deem cellular carriers ineligible at the outset, subject to a review of the restriction after three or four years to determine whether the restriction continues to be warranted.[68/] BellSouth strongly opposes this proposal.

First, such a restriction would significantly slow down the provision of service to the public. Excluding cellular licensees would preclude the participation of a class of companies with substantial expertise. The Small Business Administration stated, for example, that current mobile service providers have "technical abilities" that should not "be set aside due to fears of decreased competition."[69/] If these companies cannot contribute their market-specific technical expertise, the implementation of PCS will surely be delayed. If they are not permitted to enter for a period of three or four years, a critical dynamic force will be kept out of PCS — a dynamic force that has built cellular from zero to ten million subscribers in a decade. No new service has proceeded this rapidly.

Second, as BellSouth established in its initial comments, maintaining U.S. competitiveness globally must be an essential goal of this proceeding, consistent with Section 7 of the Communications Act.[70/] Keeping cellular licensees out of PCS, *even temporarily*, will directly hamper U.S. efforts to maintain its international leadership in new wireless services and technologies. In this regard, BellSouth also indicated that to qualify for participation abroad, a certificate must often be obtained from the FCC that the company is a *bona fide* provider of the relevant service. Cellular exclusion from PCS will have significant negative effects on international competition by innovative U.S. companies.

68/ NTIA proposes that the limitation be reviewed three years after the initial grant of PCS licenses "in light of subsequent market developments." NTIA Comments at 27-28. The Justice Department suggests that the restriction be reexamined "in a definite time period (*e.g.*, four years)." Justice Department Comments at 29-30.

69/ SBA Comments at 22.

70/ 47 U.S.C. § 157; *see* BellSouth Comments at 2-4.

Third, there is a real danger that a ban on cellular eligibility would impact the development of PCS and foreordain the results of any subsequent eligibility review. NTIA suggests that this review should focus on "how the PCS and cellular markets have developed, the degree to which cellular services and PCS offerings are close substitutes, the extent to which cellular providers are offering PCS-type services and vice versa, and the extent to which spectrum-related acquisitions have occurred among PCS license holders."[71] However, if cellular carriers are initially precluded from holding PCS licenses, they will naturally attempt to prevent the loss of customers to PCS by offering PCS-like services, albeit at a significant loss of efficiency and with limited capacity. Likewise, the PCS licensees may well have an incentive to model their service more like cellular service, because of the lower initial cost of constructing a small number of high-power cells. In other words, as discussed above, the nonparticipation of the cellular licensee in PCS may result in the development of a less innovative PCS marketplace. This scenario would seriously limit the potential of PCS, but the surface veneer of a working, competitive market could lead the Commission to retain the prohibition at the time of review.

III. MSAs AND RSAs REMAIN THE BEST GEOGRAPHIC BASES FOR PCS LICENSING

A. MSAs and RSAs are Viable Service Areas for Localized Services

The advocates of service areas larger than MSAs and RSAs typically argue that the cellular consolidation process proves that the markets used for cellular licensing are too small for PCS.[72] This conclusion does not follow for the following reasons:

1. *PCS is not the same as cellular.* PCS will be predominantly low-power and localized in nature, oriented toward pedestrian and in-building coverage in areas of relatively high usage potential, while cellular service is relatively high-power and area-wide in nature, oriented toward vehicular service, with coverage over highway corridors. Since a cellular system is oriented toward highway coverage for highly

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[71] NTIA Comments at 27-28.

[72] BellSouth's Comments address in detail the advantages of using smaller, rather than larger, service areas for PCS. BellSouth Comments at 30-39. That discussion will not be reiterated here.

mobile customers, it may be economically necessary for a cellular system to cover well beyond the boundaries of a single MSA or RSA in order to provide continuous highway coverage over an area that includes many diverse suburban and urban areas as well as a key population center. By contrast, a pedestrian-oriented system will logically have a more limited perimeter, because persons walking or traveling short distances in and around major residential or business districts are the most likely customers, and they do not require continuous coverage with hand-off over a large area. Indeed, a PCS system could theoretically be almost any size, down to a neighborhood, business district, or municipality.

2. *Even stand-alone single market cellular systems are indeed viable.* Even if the comparison with cellular were valid, the attacks on MSA/RSA licensing fail because many cellular systems built to cover just a single market area have been successful. For example, last summer an RSA system operator — in the California 3 RSA, with a population of 140,000 and no interstate highways — reported that its three-cell system, with only 800 customers, had reached the break-even point eight months after going on the air, nearly three years ahead of schedule.[73] While in many cases there may be advantages to consolidation of cellular systems, it is nevertheless clear that well-managed, economically prudent single-market cellular systems can also be viable.

3. *Service area reconfiguration should be facilitated.* In its Comments, BellSouth proposed a rule that would permit the sale or exchange of licensed service areas, in whole or in part, to facilitate the reconfiguration of service area boundaries privately among licensees.[74] While a similar rule could be adopted in the case of larger service areas as well, reconfigurations would be far easier to accomplish by assembling small market areas into a whole in "building-block" fashion, than by having to disassemble a very large region into components before reassembly.

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[73] *Up and Running*, June 1992 RURAL COMMUNICATIONS MAGAZINE 16, 18.

[74] *See* BellSouth Comments, Appendix 1 at 5 (proposed § 99.1009(c)).

4. *The MSA/RSA Model is established.* The MSA/RSA definitions are time-tested licensing area definitions specifically developed over time for area-wide radio licensing and are well-understood by the FCC, the communications industry and the financial community. No other licensing scheme has such advantages.

B. The FCC Should Not Adopt a Combination of Different Service Area Models

As noted above, BellSouth's Comments addressed the disadvantages of using each of the alternative service area models that the Commission set forth for comment. Several commenters have also advocated picking and choosing among the various alternatives to come up with a recommended blend of licensing areas. One commenter, for example, proposes mixing national licenses with MSA/RSAs;[75] another advocates using both the national and Major Trading Area service area models;[76] another suggests licensing by LATAs and Major Trading Areas;[77] and so on.

This mixed licensing area approach violates one of the goals of this proceeding — competitive delivery of services on a level playing field. The approach provides a marketing advantage to one set of licensees and a handicap to the other. Moreover, each blended approach includes the use of one or more licensing areas that suffer from the flaws already identified by BellSouth.[78] If the Commission is unsure that its initial judgment of the best service area size is correct, it should adopt smaller rather than larger area markets and employ a mechanism such as BellSouth has suggested that will allow service area boundaries to be reconfigured in the marketplace after licenses have been issued.

IV. THE COMMISSION SHOULD ADOPT EVEN-HANDED INTERCONNECTION AND INFRASTRUCTURE POLICIES

The Commission has proposed, and BellSouth supports, the adoption of PCS interconnection principles modeled on those applicable to cellular systems: reasonable arrangements, terms, and conditions no less

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75/ Bell Atlantic Personal Communications, Inc. Comments at 15-28.

76/ Time-Warner Telecommunications Comments at 7-10.

77/ Wisconsin Public Service Commission Comments at 12-13.

78/ *See* BellSouth Comments at 34-39.

favorable than those offered to others.[79] Furthermore, the Commission has recognized that its nondiscrimination rules will be adequate to address concerns that local exchange carriers will seek to disadvantage unaffiliated licensees.[80] In keeping with this policy, BellSouth proposed specific rules that would give PCS licensees the right to interconnect their systems to the public switched telephone network such that the "interconnection facilities must be reasonably suited to PCS system requirements to the extent the requested facilities can be provided."[81]

Some commenters have asked the Commission to go well beyond this reasonable policy.[82] Cox Enterprises, for example, argues that "[t]he Commission should use PCS as a means to open up local exchange competition through adoption of mandatory cost-based network unbundling, number portability, co-carrier compensation[,] and equal access to LEC signalling systems and informational databases."[83] Cox ignores limits on the Commission's jurisdiction and the fact that competition for local exchange business has been greatly enlarged.[84] In its cellular interconnection policy reconsideration decision, the Commission took pains to limit the cost-related aspects of interconnection policy to those costs that are allocated to the interstate jurisdiction — recognizing that many of the costs involved in interconnection are jurisdictionally intrastate.[85] Purely intrastate services and costs, and the intrastate components of jurisdictionally mixed services and costs,

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[79] *NPRM*, 7 FCC Rcd. at 5715. *See Efficient Use of Spectrum*, 2 FCC Rcd. 2910 (1987), *recon. in part*, 4 FCC Rcd. 2369 (1989).

[80] *NPRM*, 7 FCC Rcd. at 5706 n.54, 5715. Moreover, the Commission has expanded interconnection rights with respect to competitive access providers and is considering additional interconnection policy changes. *Expanded Interconnection*, CC Docket 91-141, *Report and Order and Notice of Proposed Rulemaking*, FCC 92-440 (Oct. 19, 1992); *pets. for recon. pending*, *Second Notice of Proposed Rulemaking*, FCC 92-441 (Oct. 16, 1992).

[81] BellSouth Comments, Appendix 1 at 11 (proposed § 99.127(b)).

[82] *See* Comments of Adelphia at 17-18; American Personal Communications at 52-53; Associated PCN at 20-21; Comcast at 36-38; Corporate Technology Partners at 25-26; Cox at 23-25; MCI at 20-23; Teleport Denver at 9-10; Time-Warner at 13-15; and GTE at 16-20.

[83] Cox Comments at 23.

[84] *See* note 80, *supra*.

[85] *See, e.g.*, 4 FCC Rcd. at 2372.

are reserved to state jurisdiction.[86] Essentially, through the guise of PCS, Cox has asked the Commission to extend to the local, intrastate level, a plethora of Commission initiatives to introduce competition in interstate service and interstate access. Such matters are obviously beyond the scope of this proceeding and would require revisiting a huge number of complex policy decisions, such as the system for providing Universal Service Fund contributions for high-cost local access service.

At the same time, Cox avoids mentioning the issue of access to its own cable facilities. Indeed, Cox would have the Commission adopt policies and rules a) permitting cable to obtain inexpensive access to the local exchange (thus permitting it to provide wired and wireless telephone service on a virtually unregulated basis); and (b) excluding both cellular and telephone carriers from the use of new wireless technologies. It would appear that Cox's unspoken goal is for cable companies to remain the dominant providers of video services and become the dominant providers of telephone and wireless services, while rendering telephone companies to the technical backwaters of copper wire by making rational deployment of the most advanced and appropriate communications facilities impossible.

Speed of deployment is a major goal of this proceeding. Were the Commission to attempt to address the entire future of local telecommunications exhaustively before authorizing PCS, this proceeding would take years to complete and service to the public would be severely delayed. The Commission should take advantage of what has been learned from the cellular experience, codify the cellular policies in its PCS rules, and reach other issues over time as necessary. Any other course of action could irretrievably delay the introduction of PCS.[87]

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[86] *Id.*; *see also Indianapolis Telephone Company v. Indiana Bell Telephone*, 2 FCC Rcd. 2893 (1987).

[87] Were the Commission to attempt to resolve all potential interconnection issues prior to licensing PCS, it would have to address, for example, whether PCS licensees, functioning as either private or common carriers, are obliged to provide equal access to interexchange carriers; whether they must make available presubscription; whether they are required to engage in jurisdictional cost separations; and so on. At the same time, the Commission would have to resolve similar issues regarding other providers of local transport services, such as cable operators. For example, the Commission might consider whether cable operators should be required to provide unbundled, cost-based access to their facilities for the delivery of video programming, data, and voice services; or whether cable operators should be subject to accounting rules and nonstructural safeguards similar to those imposed on telephone companies. It should be noted that addressing such issues in the cable context presents fewer jurisdictional obstacles
(continued...)

CONCLUSION

BellSouth reiterates that the public interest and the goals of this proceeding would be best served by adopting the proposals and rules set forth in its Comments.

Respectfully submitted,

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January 8, 1993

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[87](...continued)
to the Commission, because the Commission has been given substantial additional authority under the 1992 Cable Act. For example, under revised section 613(f)(2)(E) of the Communications Act, the Commission is empowered, in the course of its rulemaking proceedings designed to enhance effective competition, to prescribe rules and regulations that "reflect the dynamic nature of the communications marketplace." 47 U.S.C. § 613(f)(2)(E).

CERTIFICATE OF SERVICE

I, David G. Richards, hereby certify that on January 8, 1993, a copy of the foregoing "Reply Comments of BellSouth," was served by United States first-class mail, postage prepaid, to the parties on the attached list.

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