

**BELL ATLANTIC PERSONAL COMMUNICATIONS, INC.**  
 Reply Comments on 2 GHz Licensed PCS

**Interest:** PCS subsidiary of a Regional Bell Operating Company

**Band plan:**

- Five providers should be authorized with 20 MHz each (18).

**Amount of spectrum per licensed system:**

- Arguments for large allocations to compensate for existing users are illegitimate since 20 MHz is more than sufficient except in a few markets with heavy OFS usage; the aftermarket can correct in exceptional situations; large allocations uncut policies in the ET proceeding favoring relocating (not coexistence with) existing users (19-21).

**Service areas:**

- Recommends two national licensees, and the remaining systems licensed regionally and locally (21).
- Commenters have recognized the conceptual benefits of national licensing (national equipment market, global headstart, promotes rapid investment, permits expedited realization of scale economies, facilitates nationwide roaming, promotes new transmission and information services, promotes spectrum sharing, avoids costs and delays in standardization, speeds rollout, maximizes efficiency of coordination), while the opposition is less than credible -- McCaw's opposition rings hollow in light of recent statements regarding the AT&T investment promoting nationwide seamless coverage (22-24).
- BAPC's licensing scheme promotes diversity by allowing smaller companies to apply for local licenses and allowing them to interconnect with a national network (24-25).
- The paging industry shows that national licensees would have a competitive advantage (25-26).
- Although BAPC supports regional/local licensing, a national backbone is critical to infrastructure development (26-29).
- Rapid rural service can be assured since a national licensee can franchise areas and coverage benchmarks can be established (29-30).

**Cellular carrier participation:**

- OPP's study upholds Dr. Kahn's analysis of the benefits of cellular and LEC participation in PCS (2-3).

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- Arguments against LEC and cellular participation ignore the companies' experience and resources, invoking unfounded and remote speculation about anticompetitive behavior -- LECs and cellular companies will have incentives to interconnect with other providers and hospitably configure their networks if permitted to participate; the analogy to cellular service supports cellular and LEC entry (see also 14-15); and cellular and LEC participants will not have the ability to restrain competition (3-4).
- The cellular industry is committed to mobile services and has proven a fertile ground for PCS innovation (4).
- Cellular carriers do not have sufficient spectrum to offer PCS since digitization will not free significant spectrum even in the year 2000; analog roamers must be supported for the foreseeable future; PCS applications like video, multimedia, and high speed data are incompatible with cellular's narrowband channelization (4-7).
- PCS and cellular cannot be assumed to be fungible services because PCS is an open-ended concept; the likely configuration of PCS networks indicates that markets will develop that are complementary to cellular; and, even if cellular is identical to PCS, CTIA's CRA study determined that a blanket ban is still unjustified (7-10).
- DOJ's analysis is inconsistent, since it concludes that SMR and cellular are competitive, yet does not recommend barring SMR providers (11-12).
- APC's analysis is self-interested, and merely seeks protection from the ability of cellular to realize efficiencies (12-14).
- If, as BAPC recommends, 5 licenses are issued, the possibility of anticompetitive action is highly remote and a flat ban could violate the Communications Act (15 & n.34).

**Local exchange carrier participation:**

- LECs should be allowed to participate due to the vast economies of scope realizable; LECs' ability to rapidly build-out PCS in rural areas; and to encourage configuration of wireline networks in a hospitable manner (17-18; see also points under cellular participation above).

**Licensing policies:**

- Streamlined comparative hearings are needed for nationwide licensing, based on comparative criteria including geography of service; diversity of ownership; range, extent, and feasibility of services; human resources; and ability of the network to provide a variety of valuable services (30-31).

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**BELLSOUTH**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Provider of local exchange and mobile service;  
possible provider of PCS

**Band plan:**

- Reiterates support for authorizing five 20 MHz licensees and allowing use of 10-20 MHz for wireless local loop applications. (p. 1).

**Service areas:**

- Continues to support MSA/RSA licensing; dismisses arguments that these markets are too small by noting that PCS is not the same as cellular and that even stand-alone single market cellular systems are viable. Also states that service area reconfiguration would be facilitated, and that the MSA/RSA model is well-established. (pp. 24-26).
- Rejects mixed licensing area approach as thwarting competitive delivery of service on level playing field. (p. 26).

**Cellular carrier participation:**

- Continues to advocate allowing cellular carriers to be eligible for PCS licenses; notes that cellular licensees cannot provide both vehicular service and large-scale microcell service on current 25 MHz allocation, and cites OPP Paper in support. (pp. 10-13).
- States that cellular carriers will play pro-competitive role in PCS and cannot be justifiably excluded on competitive grounds. (pp. 14-17).
- Rejects OPP analysis restricting cellular eligibility for PCS licenses because of alleged "first mover advantage," given substantial differences between services and customer bases and other factors. (pp. 17-18).
- States that denying cellular eligibility subject to later reevaluation would not serve public interest. (pp. 23-24).

**Local exchange carrier participation:**

- Reiterates support for full local exchange carrier eligibility for PCS licenses to ensure competitive supply of low-cost infrastructure, and notes that

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conclusion is consistent with OPP findings. (pp. 18-22).

- Expresses concern that, if LECs are excluded, there is danger that PCS may become dominated by cable companies, regardless of number of licenses issued. (p. 20).
- States that competitive concerns do not warrant restrictions on LEC eligibility; nonstructural safeguards, when necessary, can address any anti-competitive concerns. (pp. 20-22).

**Regulatory status:**

- Supports adoption of PCS interconnection principles modeled on those applicable to cellular systems, including reasonable arrangements, terms, and conditions no less favorable than those offered to others. (pp. 26-27).
- Criticizes suggestions that Commission 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; these suggestions ignore limits on FCC jurisdiction and fact that competition for local exchange business has been greatly enlarged. (p. 27).

**Other:**

- Reiterates that PCS should be defined as new low-power wireless service as established by record; "flexible allocation" approach violates Communications act. (pp. 1-8).

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**CABLEVISION SYSTEMS CORPORATION**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Cable television service provider

**Band plan:**

- 1850-1910 and 1930-1990 MHz bands, with three licenses per market. (p. 3).

**Amount of spectrum per licensed system:**

- States that minimum of 40 MHz should be allocated for each PCS licensee; this bandwidth would give each licensee sufficient capacity to engineer viable systems around existing grandfathered users. (p. 3).
- Asserts that this allocation would ensure sufficient bandwidth to operate competitive, full-service PCS systems and reduce cost burdens involved with wholesale relocation of incumbents. (p. 3).
- Cites OPP Paper for proposition that costly consolidation of multiple licenses would be necessary in many cases if licenses are granted in 20 MHz blocks. (p. 4).

**Local exchange carrier participation:**

- Opposes set-asides or other preferential treatment of LECs, citing history of anticompetitive behavior.

**Licensing policies:**

- Reiterates earlier proposal for set-aside of one PCS license per market for local cable operators; by using existing infrastructure, cable operators could conserve spectrum by connecting microcells using wire-based facilities rather than radio spectrum. (p. 7).
- Continues to advocate use of weighted lottery for granting PCS licenses, in which applicants who have made contribution to the development of PCS through activities under experimental licenses would have an increased chance of receiving a PCS license. (pp. 8-9).

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**Regulatory status:**

- Regardless of whether LECs are permitted to obtain PCS licenses, FCC should explicitly affirm right of PCS licensees to interconnect with PSTN, and should implement streamlined procedure for prompt resolution of disputes. (p. 7).

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THE PEOPLE OF THE STATE OF CALIFORNIA AND THE PUBLIC  
UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
Reply Comments on 2 GHz Licensed PCS

**Interest:** State government and public utilities commission

**Band plan:**

- The FCC should maximize competition based on the cellular duopoly experience (1-2).

**Cellular carrier participation:**

- In order to maximize competition, cellular licensees and their affiliates should not be eligible for PCS licenses (2).

**Local exchange carrier participation:**

- The FCC should carefully consider LEC participation in PCS, and California suggests that the FCC only consider granting PCS licenses to LECs if: the LEC and its affiliates have no interest in a cellular entity; the LEC and its affiliates are barred from acquiring any interest in any other PCS licensee in the same market; the states are free to fashion regulatory safeguards to ensure PCS may fully and fairly compete with LEC services; and the states are free to determine the appropriate regulatory classification governing a LEC's provision of intrastate PCS (2).

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**CANBY TELEPHONE ASSOCIATION**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Small, rural local exchange carrier

**Other:**

- Supports comments filed by Clear Creek Mutual Telephone Company, et al. (establish smaller license areas for rural PCS; refrain from restricting the eligibility of LECs to provide PCS in rural areas or exempt rural telcos servicing areas of 10,000 or less from any general LEC restrictions; impose minimal regulation on PCS providers; and permit cooperative rural telephone companies to elect private carrier status for their PCS offerings) (1).

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**CELLULAR COMMUNICATIONS, INC.**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Cellular licensee.

**Cellular carrier participation:**

- A majority of commenters supports cellular carrier's entry into PCS within their existing service areas. (pp. 1-2). Several economic studies support cellular eligibility (Kahn, Comments of Bell Atlantic Personal Communications, Inc.); Charles River Associates, Comments of CTIA; National Economic Research Associates, Comments of BellSouth). (pp. 2-5).
- DOJ's recommendation against cellular participation is based on erroneous assumptions that the relevant market includes only cellular and PCS, and that the FCC will authorize only three PCS licenses in each market. (pp. 5-9).
- NTIA's recommendation that cellular be excluded from the provision of PCS "are so conditional as to be useless." (pp. 9-10).
- Because cellular carriers have no control over the true bottleneck facilities for PCS -- interconnection to the PSTN and advanced intelligent networks -- they should not be excluded from PCS. (p. 11).

**Licensing policies:**

- The use of auctions to award PCS licenses is not as remote as many commenters suggested because there is support in Congress, as well as the new administration, for such legislation. (p. 13).

**Regulatory status:**

- To achieve the level playing field that many commenters advocated, the FCC should regulate cellular and PCS as private radio, rather than regulating both as common carriers. (p. 14).

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**CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION**  
 Reply Comments on 2 GHz Licensed PCS

**Interest:** Trade association for cellular carriers

**Band plan:**

- Five licensees with 20 MHz each (4).
- Licensing five providers comports with FCC policies preferring competition over regulation; has the support of NTIA, DOJ, and OPP; and is consistent with cellular licensing policies whereby more competitors were authorized in the face of unknown market projections (4-7).
- Scale economies are not large enough to support sacrificing competition by authorizing fewer providers (8).
- The Commission should err on the side of larger numbers of competitors and smaller spectrum blocks (15-16).

**Amount of spectrum per licensed system:**

- Arguments for more than 20 MHz are unsupported -- the studies omit analysis of 20 MHz blocks; make overly pessimistic assumptions to achieve predetermined results (assume no relocation, huge exclusion zones, limited re-use, and inefficient digital compression and modulation); or focus on a few, atypical markets and tenuously extrapolate to all markets (8-13).
- 20 MHz blocks avoid complex 3-way negotiations (13).
- Telocator's spectrum estimates, run again at CTIA's request using 5 licensees and mean (rather than maximum) traffic densities, indicate that 20 MHz is sufficient (13-14).
- To compensate in markets where additional spectrum is needed to avoid interference or to offer higher bandwidth services, PCS spectrum should be freely transferable (14-15).

**Service areas:**

- The record overwhelmingly supports MSA/RSA licensing, since these areas are well-defined and understood by industry participants, consumers, and the FCC; will best achieve the FCC's four stated PCS goals; were designed for mobile services; will best accommodate localized PCS systems; are self-correcting to achieve optimal PCS market sizing; avoid mismatches between cellular and PCS service areas; and promote broader entry (28-30).
- A cellular ban, in conjunction with anything but MSA/RSA licensing, would be arbitrary and capricious (44-45).

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- LATAs were only supported by a handful of commenters, and are not designed for mobile services (30-32).
- Arguments for BTAs also recommend the use of MSAs and RSAs (broad participation, diversity of services, entrepreneurial opportunity), but BTAs are retail oriented; would entail costly delays to customize the markets for mobile use; and would not significantly reduce the number of licensing decisions over MSA/RSA licensing (32-33).
- MTAs are favored simply because they are bigger, not because they are appropriate for PCS; however, the delays in cellular were not due to the size of the MSAs and RSAs; cellular consolidation arguments are irrelevant because PCS is not a cellular clone; cellular clustering may not be a harbinger of PCS development; and MTAs are not commensurate with the inherent markets for PCS systems (33-37).
- National licenses and consortia are opposed by commenters; contravene the Notice's stated goals; have only illusory benefits; are not justified by perceived economies of scale; are not the optimum vehicle to guarantee standards or interoperability; and are not supported by prior FCC decisions where national licenses were implemented (37-44).

#### Cellular carrier participation:

- Economic theory and FCC precedent favor open eligibility for PCS licenses, and allowing unrestricted cellular participation would allow realization of scope economies without endangering competition (16-17).
- DOJ's analysis, under corrected assumptions, indicates that cellular participation would not result in undue market concentration since spectrum capacity is an imperfect proxy for market concentration; DOJ assumes only three PCS licenses per market; and DOJ's analysis ignores partial transfers in favor of mergers (18-21).
- Arguments that the cellular industry is noncompetitive are mistaken -- the GAO report was made in the absence of any price and cost data and CTIA's own analysis (Exhibit 1) indicates the performance of the cellular market is competitive even if the structure is not (22-24).
- As noted by A. Kahn, OPP, and others, joint cellular/PCS provision would provide substantial economies of scope (24-25).
- Cellular carriers' current spectrum is inadequate to support PCS since CTIA's comments show that the entire allocation is needed to meet growing needs of cellular subscribers and digitization is only a limited solution and will not free short term capacity (25-27).

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**CELSAT**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Applicant for pioneer's preference and prospective provider of hybrid satellite/terrestrial PCS

**Band plan:**

- Recommends 5 licenses: 3 terrestrial systems, two satellite PCS systems, and one hybrid system (4).
- Under CELSAT's plan, the 1970-1975 MHz band would be preserved for uses foreseen at WARC-92 by allocating this band to a satellite or hybrid system (4).
- At a minimum, 1975-1990/2165-2180 MHz should be reserved for a hybrid or MSS PCS system (4).
- The second (and potentially third using TDD) satellite PCS system could be authorized to 2120-2150 MHz (4-5).

**Service areas:**

- National licenses are particularly appropriate for satellite-based PCS systems (2-3).

**Plan for relocation of existing users:**

- CELSAT has proposed to use 117 spot beams and very low power terminals, which should facilitate sharing (5).

**Other issues:**

- Satellite-based MSS systems and hybrid MSS/terrestrial PCS systems promote the Commission's goals of universality, speed of deployment, competitive provision and diversity by providing complete coverage of the United States using low-power (0.1 W) handsets (1-6).
- Given the pioneer's preference policies, other licensing preferences for pioneer's preference applicants or experimental licensees are unwarranted (6).

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**CENDEL CORPORATION**  
 Reply Comments on 2 GHz Licensed PCS

**Interest:** Cellular and local exchange telephone carrier

**Amount of spectrum per licensed system:**

- The record supports optimizing the number of PCS providers to ensure the full effects of competition (13-15).

**Service areas:**

- The comments overwhelmingly support defining PCS service areas by MSA/RSA boundaries as these smaller areas would encourage service diversity, stimulate innovation, expedite implementation, and be more suitable for the localized services envisioned for PCS (15-16).
- MCI's national consortium proposal is likely to stifle innovation and restrict the variety of services offered. By requiring conformity to a "uniform floor" of services, this proposal would thwart the development of specialized services to meet local or regional needs. MCI's self-serving eligibility criteria would also unjustifiably exclude the most experienced and qualified entities (17-19).

**Cellular carrier participation:**

- Numerous commenters agree that cellular carriers should be fully eligible for PCS spectrum both within and outside of their cellular service areas (5).
- Cellular carriers possess unparalleled expertise in the delivery of mobile services to the public and, because of their infrastructure, are uniquely positioned to offer PCS services (6-7).
- The OPP Study finds the potential for significant economies of scope between cellular and PCS services and confirms that fears of anti-competitive conduct by cellular carriers are unjustified (8-9).
- The OPP Study also confirms that, absent access to new spectrum, current capacity restraints and technical limitations will prevent cellular carriers from offering low cost PCS services (9).

**Local exchange carrier participation:**

- The majority of commenters either support or do not oppose LECs' eligibility to participate in PCS (10).

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- LECs' experience and existing infrastructure make them well positioned to rapidly and efficiently deploy a variety of PCS services (10).
- The OPP Study predicts that substantial economies and other benefits could be realized by allowing LECs to participate in PCS (11-12).

**Regulatory status:**

- Comparable regulatory treatment should be afforded to all providers of wireless services (20-21).

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**CINCINNATI BELL TELEPHONE COMPANY**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Local exchange carrier

**Band plan:**

- Continues to support four licensed band pairs, with a fifth unlicensed pair, for PCS providers. (p. 6).

**Service areas:**

- Supports MSA/RSA licensing because scheme is convenient from regulatory standpoint and accurately reflects economic realities. (p. 6).
- Does not oppose nationwide licensing if one or two properly structured national licenses could be issued to highly-qualified consortia of PCS providers; however, would oppose if scheme excluded qualified participants, including LECs and entities holding non-controlling interests in cellular licenses. (pp. 6-7).
- States that nationwide and MSA/RSA licensing can co-exist to benefit of public; potential demand for PCS appears large enough to accommodate both types of licenses. (p. 7).

**Local exchange carrier participation:**

- Supports full LEC participation in PCS; LECs are ideally situated and essential to implementing PCS in timely and efficient manner; cites OPP Paper in support. (pp. 4-5).
- Asserts that, given costs involved in establishing PCS, four or five providers will provide ample competition; furthermore, adequate safeguards address any anticompetitive concerns. (p. 5).

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**CITY UTILITIES OF SPRINGFIELD, MISSOURI**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Municipal utility

**Band plan:**

- Reiterates request that FCC set aside a minimum 10 MHz allocation in the 2 GHz range for utility PCS use. (pp. ii, 5-12).
- States that a reservation or set-aside is necessary to provide opportunity for development of new and innovative services that do not have the mass market applicability of another cellular-type service but nonetheless serve important public interests. (p. 3).
- Asserts that utility set-aside would provide substantial and definable public benefits and goals; increased efficiency of utility operations is a national priority, and PCS has potential to solve many communications deficiencies currently hampering utilities. (pp. 5-11). Notes support in record for a special allocation for utilities. (pp. 11-12).

**Local exchange carrier participation:**

- Does not oppose set-aside for LECs; however, since Commission is unlikely to grant multiple set-asides, contends that utility set-aside has relatively more merit from perspective of public interest. (pp. 4-5).

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**CLEAR CREEK MUTUAL TELEPHONE COMPANY,  
 MOLALLA TELEPHONE COMPANY,  
 MONITOR COOPERATIVE TELEPHONE COMPANY,  
 MONROE TELEPHONE COMPANY,  
 MT. ANGEL TELECOMMUNICATIONS, INC.,  
 PIONEER TELEPHONE COOPERATIVE,  
 SCIO MUTUAL TELEPHONE ASSOCIATION AND  
 YELM TELEPHONE COMPANY**  
 Reply Comments on 2 GHz Licensed PCS

**Interest:** Rural local exchange carriers

**Service areas:**

- Join the National Rural Telecom Association and the Organization for the Protection and Advancement of Small Telephone Companies in urging the Commission to license small service areas no larger than MSAs/RSAs. Small service areas will encourage broader participation in PCS, greater diversity of services, broader technical innovation, and promote universality. The Commission should also permit rural LECs to carve out a smaller PCS service area from MSAs/RSAs (9-10).

**Cellular carrier participation:**

- Comments reveal a general consensus that rural cellular carriers should be permitted to provide PCS in their service areas (2).

**Local exchange carrier participation:**

- The majority of comments agree that rural LECs should be eligible to provide PCS within their service areas. In rural areas, ensuring the introduction of new services is more critical than concerns of anti-competitive effects. Small LECs, in particular, possess a demonstrated commitment to serve rural areas (4-5).
- Concur with view of many commenters that, to ensure rural LEC participation, one PCS license in each rural market should be set aside for the LEC to provide PCS to its service area (5-6).

**Licensing policies:**

- Opposes use of lotteries to select PCS licensees for rural areas. Rather, the Commission should grant a PCS license upon request to rural LECs serving populations of 10,000 or less, provided that they will serve their existing service areas (6-8).
- Alternatively, if the Commission chooses to use a lottery process, certain reforms should be adopted, such as awarding

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a preference to small telephone companies serving rural areas, imposing short filing windows, limiting license transfers, requiring stringent technical and financial showings, and mandating reasonable construction periods and commencement deadlines (8-9).

**Regulatory status:**

- Rural telephone cooperatives should be given the option to provide PCS to their memberships as a private carrier service (10).

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**COMCAST PCS COMMUNICATIONS, INC.**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Cable television company and cellular provider.

**Band plan:**

- The FCC should license four PCS providers per LATA, each with 20 MHz; the remaining spectrum should be used to create a spectrum reserve. (pp. 23-26).

**Amount of spectrum per licensed system:** 20 MHz.

**Service areas:**

- LATA-sized service areas are the best alternative for PCS because they are large enough to promote competition with the LECs, yet small enough to encourage diversity and innovation. (pp. 27-29).

**Cellular carrier participation:**

- Non-wireline cellular operators should be permitted to hold PCS licenses within their cellular market because, unlike wireline operators, they have no affiliate to protect or control over interconnection. (pp. 12-13).
- As the OPP Paper suggests, the entry of non-wireline cellular operators will benefit consumers through the exploitation of economies of scope that exist between PCS and cellular. (p. 14).
- The FCC's Notice mistakenly treats PCS as a competitive alternative to cellular and suggests that cellular operators should be excluded from PCS eligibility; however, PCS will surpass the capabilities of cellular and become a competitive alternative to the local exchange. Thus, cellular operators should not be excluded from PCS eligibility. (pp. 15-16).
- The comments of APC and PerTel, which propose banning cellular participation in PCS within a cellular operator's service area, do not address the inability of cellular operators to provide existing services and PCS within their current spectrum allocations. (pp. 17-20).

**Local exchange carrier participation:**

- Supports open eligibility for participation in PCS, subject to the following restraint: LECs and their affiliated cellular providers should not be eligible to hold PCS licenses within their landline franchise areas until either effective competition has developed or an initial period of time has expired. (pp. 5-6).

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- NYNEX's proposal that LECs should be fully eligible for PCS licenses, even in markets where the LEC has an affiliated cellular carrier, but that non-LEC affiliated cellular carriers should be eligible for PCS licenses only outside their current cellular service areas, is self-serving and seeks to perpetuate anticompetitive practices. (p. 8).
- Allowing LECs initial PCS eligibility would encourage them to engage in abusive practices in the provision of essential facilities upon which PCS providers will be dependent, such as interconnection to the PSTN. (pp. 9-10).
- Both the OPP Paper and DOJ's comments recognize that LECs may offer PCS providers inferior interconnection. (pp. 9-10).
- If the FCC declines to foreclose in-market LECs and LEC-affiliated cellular operators from initial eligibility as PCS licensees, then the FCC should give non-wireline cellular carriers the same opportunities as LECs and LEC-affiliated cellular carriers. Specifically, non-wireline cellular operators should be granted a spectrum set-aside or PCS license in a particular market whenever a LEC or LEC cellular affiliate is granted a set-aside or license. (p. 12).

**Regulatory status:**

- PCS providers should be permitted to opt for private or common carriage based on the nature of their service and consistent with NARUC v. FCC. (pp. 30-31).
- If PCS licensees elect to provide their services on a common carrier basis, the FCC should ensure minimal economic regulation at the federal level and preemption of state policies as necessary.

**Other:**

- The OPP Paper endorses Comcast's conclusion that cable can provide the backbone network function essential to the cost-effective introduction of PCS. (pp. 20-21; 28-29).
- LEC arguments raising cable eligibility and interconnection policy concerns are "fantastical" because, unlike LECs, cable operators do not have monopoly control over vast geographical switching networks. (pp. 21-23).

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**COMSEARCH**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Frequency coordinator

**Amount of spectrum per licensed system:**

- Strongly urges FCC not to consider allocations smaller than 40 MHz per licensee (1).
- Licensees must co-exist with OFS users, 90 percent of which use 10 MHz channelization; accordingly, a 20 MHz PCS licensee will be blocked for each occurrence of these receivers. Even a 30 MHz PCS licensee will face substantial blocking, since the receive IF filters are often at or near 15 MHz. (2).
- Even though PCS licensees can relocate existing users, many operations will be grandfathered indefinitely (1-2).

**Technical standards:**

- Comsearch urges the FCC to require frequency coordination for each base station, since coordination is the single most important aspect of sharing (2).

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**CONCORD TELEPHONE COMPANY**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Rural local exchange carrier

**Service areas:**

- Supports small service areas (such as MSAs/RSAs) because this would increase the participation of small firms in PCS. The US Small Business Administration has documented the innovative role of small business in our economy (1-3).

**Other:**

- Strongly supports comments of USTA (use of MSAs/RSAs, licensing of 5 providers of 20 MHz each, full participation of LECs) (3).

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**COPPER VALLEY TELEPHONE COOPERATIVE**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Small, rural local exchange carrier

**Other:**

- Supports comments filed by Clear Creek Mutual Telephone Company, et al. (establish smaller license areas for rural PCS; refrain from restricting the eligibility of LECs to provide PCS in rural areas or exempt rural telcos servicing areas of 10,000 or less from any general LEC restrictions; impose minimal regulation on PCS providers; and permit cooperative rural telephone companies to elect private carrier status for their PCS offerings) (1).

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**CORDOVA TELEPHONE COOPERATIVE, INC.**  
Reply Comments on 2 GHz Licensed PCS

**Interest:** Small, rural local exchange carrier

**Other:**

- Supports comments filed by Clear Creek Mutual Telephone Company, et al. (establish smaller license areas for rural PCS; refrain from restricting the eligibility of LECs to provide PCS in rural areas or exempt rural telcos servicing areas of 10,000 or less from any general LEC restrictions; impose minimal regulation on PCS providers; and permit cooperative rural telephone companies to elect private carrier status for their PCS offerings) (1).

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**CORPORATE TECHNOLOGY PARTNERS, KBLCOM CORPORATION, MRC COMMUNICATIONS, INC., TEL/LOGIC, INC., TELMARC TELECOMMUNICATIONS, INC., AND WIRELESS SERVICES CORP.**

Reply Comments on 2 GHz Licensed PCS

**Interest:** Joint comments of PCS developers.

**Band plan:**

- No more than three licenses should be granted in urban markets and no more than two licenses should be granted in rural markets. (p. 3).

**Cellular carrier participation:**

- Supports the comments of MCI that cellular operators should not be allowed to provide PCS in any area that overlaps their current cellular service area. (p. 3).

**Local exchange carrier participation:**

- Generally, LECs should be excluded from PCS because of the potential for anticompetitive behavior. However, smaller LECs should be permitted to provide PCS in smaller cities and rural areas as a part of a national consortium. (p. 4).

**Licensing policies:**

- The FCC's goals in this proceeding are best met by awarding licenses through comparative hearings to companies and groups of companies that provide subscribers with national seamless interoperability. (pp. 1-3).
- A national consortia license, such as that proposed by MCI, is appropriate for groups of companies that promise coverage of a major part of the U.S. (p. 1).
- No national license should be awarded to a single company. (p. 1).
- Comparative hearings should be based on the ability of each applicant group to provide national seamless interoperability to its subscribers, speed deployment of PCS technology and offer high capacity, low cost PCS technology in frequency sharing with fixed microwave or migration of microwave users to other bands. (p. 2).
- A group of companies that includes a substantial number of PCS pioneers should be given priority in license awards. (p. 4).

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