narrowband licensees to self-designate as either private or common carrier services. (pp. 13-14)

- There is support for the FCC's tentative decision to permit narrowband PCS providers, regardless of regulatory status, equal rights to interconnection with the PSTN. (p. 14)

Technical standards:

- There is agreement that the proposed power, height and interference rules for narrowband PCS provide a good starting point for industry developed technical rules for use of the 930-931 and 940-941 MHz bands. (p. 17)

- There is also agreement that 901-902 MHz should be limited to low power usage. (p. 18)

Other issues:

- The number of commenters and volume of comments filed on broadband PCS, as compared to narrowband, indicate that there are fewer and more narrowly focused issues remaining to be resolved for 900 MHz services as well as less contention between positions advocated. The FCC should thus establish separate procedural tracks for 900 MHz narrowband and 2 GHz broadband PCS. (pp. 2-5)

- Proposals by API, Corporate Technology Partners, and In-Flight Phone for non-messaging applications in 900 MHz narrowband PCS spectrum should not be approved. (p. 7)

    - Large private users such as API already have access to spectrum for their needs. (pp. 7-8)

    - The CT-2 type services proposed by Corporate Technology Partners are more appropriately deployed in the 2 GHz broadband allocation. (pp. 8-9)

    - In-Flight's proposal to use the 900 MHz band for entertainment services is inconsistent with the FCC's objective of promoting innovative data and voice messaging services in this band. (pp. 9-10)

- UTC's proposal to reserve 1 MHz of narrowband PCS spectrum for non-commercial, internal use by private radio eligibles should be rejected as it would constitute an unwarranted set-aside and is contrary to the FCC's intention to ensure that PCS is aimed at a broad public market. (pp. 12-13)