

EX PARTE OR LATE FILED

PIPER & MARBURY

1200 NINETEENTH STREET, N.W.
WASHINGTON, D. C. 20036-2430
202-861-3900
FAX: 202-223-2085

DOCKET FILE COPY ORIGINAL

RONALD L. PLESSER
202-861-3969

BALTIMORE
NEW YORK
PHILADELPHIA
LONDON
EASTON, MD

RECEIVED

July 28, 1993

JUL 28 1993

HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: GEN Docket No. 90-314 ✓
ET Docket No. 92-100 ✓
Ex Parte Presentation

Dear Mr. Caton:

Yesterday we filed with your office a notification pursuant to Section 1.1206 of the Commission's rules advising you that, in my capacity as counsel for PCS Action, Inc., a coalition of companies to promote the deployment of PCS services, I met with Robert M. Pepper, Chief, Office of Plans and Policy. Inadvertently, copies of the enclosed PCS Action fact sheet and membership roster were omitted from the filing. Please associate the enclosed materials with yesterday's filings.

In accordance with the Commission's rules, I am hereby submitting one original and one copy of this letter and its enclosures for each of the above-referenced proceedings.

Very truly yours,


Ronald L. Plesser

Enclosures

cc: Mr. Robert M. Pepper (without enclosure)

No. of Copies rec'd 0+1
List ABCDE

PCS ACTION, INC.

FACT SHEET

PCS ACTION, INC. • 1200 19TH STREET, NW • 7TH FLOOR • WASHINGTON, DC 20036 • (202) 861-2957 • FAX: (202) 861-3963

What is PCS ACTION?

PCS ACTION is a new coalition of companies promoting the rapid deployment of PCS services. The member companies comprise competitors, companies from different locations in the United States, of different sizes and from different sectors of the American economy, manufacturers and leaders in different technologies such as cable, cellular, and print media.

What is PCS?

PCS stands for Personal Communications Services. PCS is a family of digital, high capacity, telecommunications services that offer affordable mobile communications of both data and voice.

Because they are designed to enable people or devices to communicate independent of any fixed location, PCS allow people to communicate anytime and virtually anywhere. Consumer and business applications include low-cost mobile telephony services using pocket-sized handsets, wireless PBX and computer networks, and mobile transmissions of information to and from laptop computers, palm tops, and electronic organizers. Special applications for education, health care, and security use are also part of the PCS potential. And PCS is anticipated to cost 30 percent to 50 percent less than today's cellular services.

By bringing more services to more people at lower cost, PCS will have a broad and favorable impact on American families and businesses.

What are the Goals of PCS ACTION?

The goals of PCS ACTION include:

1. **Promoting a rapid and broad deployment of PCS.** The PCS industry is ready now to offer a family of low-cost personal communications services. PCS, if promptly and properly licensed, could generate close to \$200 billion in new commercial activity by the end of the next decade and create more than 300,000 good new American jobs. Deployment of this new technology and the generation of new jobs and commercial activity requires government action: the issuance of commercial PCS licenses.

2. Ensuring that 40 MHz of spectrum is made available to each PCS licensee. Sufficient spectrum is necessary to deploy PCS effectively. PCS, unlike other services, will share the spectrum band with thousands of microwave users. Forty MHz of spectrum per license is needed to allow PCS licensees to accommodate the needs of existing microwave users with whom they will be sharing spectrum, such as utilities, railroads and public safety organizations. Too little spectrum would leave entire geographic areas blocked out from PCS because of microwave use. Moreover, particularly given the presence of incumbent licensees, 40 MHz of spectrum is necessary to provide the full array of data communications demanded by consumers.

3. Ensuring that two, and certainly no more than three, PCS licenses are issued to each market. Landline, cellular, SMR and other mobile service providers exist today and will compete in each market with future PCS providers. More than two PCS licenses would over-saturate potential markets and marginalize this new service, making it difficult or impossible for PCS providers to compete with these entrenched technologies.

4. Ensuring that PCS licensing is implemented in large license areas. PCS licenses need to cover large enough areas to make this business viable, valuable, and competitive. In the cellular industry, for example, nine companies now control service to nearly 90 percent of our population. Small slices of geography would mean the death of a thousand cuts for PCS.

5. Ensuring that well-qualified PCS licensees are selected by an expeditious mechanism. However selected, PCS licensees should be well qualified to operate these businesses in the public interest. Past allocation techniques have resulted in years of delay; a mechanism should be adopted that will substantially shorten the implementation period for PCS and maintain the quality of licensees.

6. Ensuring that unlicensed PCS be implemented expeditiously and in a manner that does not disadvantage or delay the implementation of licensed PCS. PCS technology will bring the concept of the "wireless office" into reality. Wireless LANs, wireless PBXs, and other wireless office devices can be deployed on an unlicensed basis. It is in the PCS industry's interest to have these unlicensed PCS devices implemented expeditiously, and to allow for interoperability between licensed and unlicensed PCS where applicable. This will bring about truly efficient wireless networks.

Ronald L. Plessner
Piper & Marbury
1200 19th Street, N.W.
Washington, D.C. 20036
202/861-3969
Counsel to PCS ACTION, INC.

Anthony T. Podesta
Podesta Associates, Inc.
1001 G Street, NW
Washington, D.C. 20001
202/393-1010
Spokesperson for PCS ACTION, INC.

PCS ACTION, INC.

1200 19TH STREET, NW • 7TH FLOOR • WASHINGTON, DC 20036 • (202) 861-2957 • FAX: (202) 861-3963

Membership Roster

Service Provider Members:

- American Personal Communications/
The Washington Post Company
- Associated PCN Company
- Cox Enterprises, Inc.
- Crown Media
- MCI Telecommunications Corporation
- Omnipoint Corporation
- Providence Journal Company
- Times Mirror Cable Television, Inc.
- Time Warner Telecommunications

Manufacturing Members:

- Motorola Inc.
- Northern Telecom
- QUALCOMM, Inc.

Ronald L. Plessner
Piper & Marbury
1200 19th Street, NW
Washington, DC 20036
202/861-3969
Counsel to PCS ACTION, INC.

Anthony T. Podesta
Podesta Associates, Inc.
1001 G Street, NW
Washington, DC 20001
202/393-1010
Spokesperson for PCS ACTION, INC.