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September 15, 1993

**SEP 15 1993**

**HAND DELIVERY**

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**EX PARTE OR LATE FILED**

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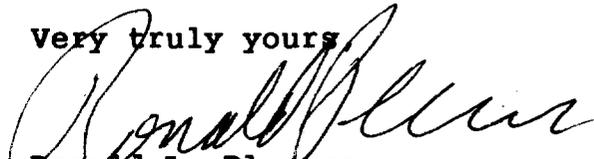
Re: GEN Docket No. 90-314  
ET Docket No. ~~90-500~~  
Ex Parte Presentation

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's rules, this is to advise you that, in my capacity as counsel to PCS Action, Inc., a coalition of companies to promote the deployment of PCS services, I submitted today a letter to Commission Chairman James H. Quello.

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

Very truly yours,

  
Ronald L. Plesser

Enclosures

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# PCS ACTION, INC.

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SEP 15 1993

September 15, 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

HAND DELIVERY

The Honorable James H. Quello  
Federal Communications Commission  
Room 802  
1919 M Street, N.W.  
Washington, D.C. 20554

EX PARTE OR LATE FILED

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

Dear Mr. Chairman:

PCS Action would like to respond to the filing recently made by the National Telecommunications and Information Administration. We believe that the NTIA has appropriately discussed the need to ensure the assignment of new PCS licenses in such a way as to create and stimulate new competition in wireless communication.

We particularly applaud NTIA's interest in a bifurcated approach that will provide new entrants spectrum while restricting allocations to the existing cellular providers.

PCS Action continues to strongly support allocations of 40 MHz per license on the basis of large license areas. We are pleased to note that NTIA has now concluded that the allocation of 20-Mhz licenses will make the rollout of PCS impossible.

We are also concerned with the suggestion of NTIA that licenses should be allocated on the basis of the 183 areas developed by the Department of Commerce's Bureau of Economic Analysis (BEA). We oppose this suggestion. The debate has

The Honorable James H. Quello  
September 15, 1993  
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been between national licenses, Major Trading Areas, Basic Trading Areas, MSAs and RSAs. A record has been developed on these proposals. It is not helpful to have an essentially new approach suggested at this date.

Moreover, 183 license areas are too small. They will fractionalize the markets and make it impossible for the new PCS entrants to effectively compete with the nine cellular companies that control service access to 90 percent of today's cellular subscribers in the United States. PCS Action continues to assert that the FCC must allocate spectrum on the basis of large license areas if the vision for PCS is to be accomplished.

Nonetheless, we believe that NTIA supports the vision of PCS that we share.

Thank you again for your attention to this matter.

Sincerely,



Ronald L. Plessner

cc: Commissioner Andrew C. Barrett  
Commissioner Ervin S. Duggan  
The Honorable Larry Irving, NTIA  
Mr. Brian F. Fontes  
Mr. Byron F. Marchant  
Mr. Randall S. Coleman  
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Mr. John Winston