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FCC MAIL ROOM

October 22, 1993

Secretary's Office  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

re: COMMENTS FOR PP DOCKET NO. 93-253

Dear Commissioners:

I am a partner of The Quick Call Group, which has applied for twenty-five cellular fill-in licenses.

We have spent considerable time, money and effort preparing these applications in good faith according to prevailing FCC guidelines and public notices. Our costs include engineering fees, legal fees, commitment fees, administrative expenses and the FCC filing fees.

These applications were timely filed with the FCC between March and April of 1993. Eleven were accepted for filing on July 9, 1993 (in addition two are being held in abeyance), six were accepted for filing on August 4, 1993, and the remainder are in suspense.

Having relied in good faith upon the FCC's policies and guidelines, it is now unfair that the FCC should change the rules of allocation from lottery to auction after substantial investments have been made by some ten thousand applicants in addition to ourselves. Damages to all of these applicants will be enormous.

We are ready, willing and able to build and operate any and all of the cellular fill-in licenses for which we have applied, if we are fortunate enough to obtain allocation through the lottery process.

Since the FCC has the option pursuant to Section 309(j) of the Communications Act of 1934 to allocate cellular fill-in licenses by means of an auction, I urge the FCC to allocate these cellular fill-in licenses as soon as possible by means of the original lottery process.

Sincerely yours,



Kevin J. Koons

cc: Partners of The Quick Call Group  
Cary S. Tepper, Esq.

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