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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

November 10, 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 in a group which has applied for nearly forty cellular fill-in licenses.

We have invested a tremendous amount of time and significant amounts of capital in the preparation and filing of these applications--all filed according to prevailing FCC guidelines and public notices. Our costs include engineering fees, legal fees, commitment fees, administrative expenses and the FCC filing fees.

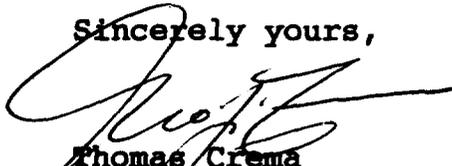
These applications were timely filed with the FCC between March and April of 1993.

We have relied in good faith upon the FCC's policies and guidelines in this matter. It is difficult to imagine how the FCC can now justify a decision to change the rules of allocation from lottery to auction after substantial investments have been made by us and thousands of other applicants. The financial damage and dislocation that will be caused these applicants--many of them small businessmen and women--will be very serious and irreparable.

We are ready, willing and able to build and operate 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 use either an auction or a lottery to allocate the cellular fill-in licenses in question, basic fairness demands and I strongly urge that the FCC allocate these licenses as soon as possible by means of the lottery process. If a decision favoring the lottery process for pending fill-in licenses cannot be made with the information available, I further suggest that additional time be allowed for public comment.

Sincerely yours,



Thomas Crema

3100 P St NW.

Washington, D.C. 20007

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