

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington D.C. 20554

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In the Matter of )  
Implementation of Section 309(j) )  
of the Communications Act )  
Competitive Bidding ) PP Docket No. 93-253

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COMMENTS

As a woman working for a large telecommunications company, I respectfully reply with the following comments from my personal perspective. My comments in no way reflect the views of my employer.

I. MINIMIZING ABUSES

In response to requests for comments (pg. 25, paragraph 77) on the eligibility of women and minority backed applicants, the Commission should consider requiring 50.1% of control by these groups. Anything less than 50.1% would allow for the mistreatment of these entities; control without 50.1% may be difficult to test. If the Congress and the Commission truly want to give opportunities to designated entities, they should give them the power to meet the challenge. 50.1% control is a simple test which helps to minimize abuses.

In addition to 50.1% control, experience in the wireless industry before the September 23, 1993, announcement of the PCS Docket 90-314 or some other appropriate date chosen by the Commission, should be required. Requiring minority and women candidates with experience in the wireless area before September 23, 1993, will minimize

abuses of "fronts" by some who would wish to deceive to obtain special treatment. Verifying wireless experience before a specified date should be a manageable test.

## II. ENSURING SUCCESS OF DESIGNATED ENTITY LICENSEES

There are many other benefits associated with the experience criterion:

- Only a candidate with experience in the wireless area can truly appreciate the magnitude and the direction of what the Commission is trying to accomplish as it relates to Personal Communication Services.
- Since the Congress and the Commission are being gracious in allowing special consideration, they should expect candidates to provide some value in return for that special consideration. Experience in the wireless industry is a value. A women or minority candidate with experience will have earned special consideration for a PCS license.
- Experience in the wireless industry gives a candidate sensitivity to the past treatment of women and/or minorities in the wireless industry. That sensitivity will work to establish more opportunities for women and minorities in PCS.
- The Commission will want to ensure some level of viability for the designated entity licensees. A person with experience in the wireless industry would be best qualified to make decisions on strategy.

## III. CONCLUSION

I view this as applying for a special job. There should be certain qualifications specific to PCS for consideration a licensee. Experience in this area is one of them. Some may argue that this limits the opportunity for designated entities without wireless experience to compete. Everyone, however, is allowed to compete for the non-designated licenses.

Thank you.

A handwritten signature in cursive script, appearing to read "Arlene Strega".

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