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November 12, 1993

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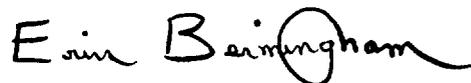
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Re: Implementation of Section 309(j) of
the Communications Act Competitive
Bidding, PP Docket No. 93-253

Dear Sir/Madam:

We respectfully submit a substitute page two to comments filed on November 10, 1993, by Century Communications Corporation in the above-referenced matter. The replacement page corrects the word "none" on the next to the last line on page two to read "nine."

Sincerely,



Erin R. Bermingham
Counsel for Century Communications
Corporation

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I. THE COMMISSION SHOULD RULE THAT COMPETITIVE BIDDING APPLIES TO DBS

The Notice seeks comments regarding implementation of the Commission's authority pursuant to the Omnibus Budget Reconciliation Act of 1993, which added a new Section 309(j) to the Communications Act of 1934, as amended, 47 U.S.C. §151 et seq. ("Act"). Section 309(j) authorizes the Commission, under specified conditions, to employ competitive bidding procedures to choose from among two or more mutually exclusive applications for initial licenses in certain classes of service.

At paragraph 23 of the Notice, the Commission seeks comment on whether competitive bidding should be used to award mutually exclusive applications for licenses in the Direct Broadcast Satellite ("DBS") service. The decreasing number of unassigned DBS frequencies coupled with the character of DBS service dictate that the Commission should require competitive bidding for mutually exclusive DBS frequency applications.

A. A Dwindling Supply of Unassigned DBS Frequencies Makes Mutually Exclusive Applications Inevitable.

Pursuant to Section 309(j)(1) of the Act, competitive bidding is only relevant when "mutually exclusive applications are accepted for filing for any initial license or construction permit" To date, the Commission has been able to award DBS construction permits on a first-come, first-served basis, without the necessity of resolving mutually exclusive applications. Thus far, the Commission has issued nine construction permits for DBS licenses, although none are yet in