

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re application of)	
MOBILE TELECOMMUNICATION TECHNOLOGIES)	File No. _____
CORP.)	
For a Nationwide Narrowband PCS License)	
Following Award of Pioneer's Preference)	
In the matters of)	
Amendment of the Commission's Rules to)	Gen. Docket No. 90-314
Establish New Narrowband Personal)	ET Docket No. 92-100
Communications Services)	File No. PP-37
Implementation of Sections 3(n) and)	
332 of the Communications Act)	Gen. Docket No. 93-252
Implementation of Section 309(j) of the)	
Communications Act -- Competitive)	PP Docket No. 93-253
Bidding)	
Review of the Pioneer's Preference Rules)	ET Docket No. 93-266

To: The Commission

COMMENTS IN SUPPORT OF
EMERGENCY MOTION TO RETURN MTEL APPLICATION

PageMart, Inc. ("PageMart"), by and through its counsel, hereby submits comments in support of the Emergency Motion to Return Mtel Application ("Motion") filed by BellSouth Corporation ("BellSouth") on November 12, 1993.

As demonstrated by BellSouth's Motion, the narrowband PCS application filed by Mobile Telecommunication Technologies Corp. ("Mtel") on October 29, 1993, cannot even be processed, let

along granted, for a variety of reasons. PageMart concurs in each of the points raised by BellSouth. Additionally, PageMart attaches hereto and incorporates herein by reference a copy of the comments it is filing simultaneously in Docket No. 93-266 regarding, inter alia, the continued viability of the entire pioneer preference system and the independent need to significantly adjust the terms of those preferences already awarded, including Mtel's.

The Commission already has substantially skewed the competitive balance by creating the erroneous public impression that it favors Mtel's technology over all others, a flaw seemingly inherent in the pioneer preference system. The agency should not compound that problem by embracing Mtel's groundless suggestion that its application can and should be processed without any regard for the applicable Commission policies and rules cited in BellSouth's Motion. There simply is no public interest rationale that supports Mtel's request.

CONCLUSION

PageMart submits that the only lawful and equitable response to Mtel's unprecedented attempt to rush the Commission to judgment on its application is that the application be returned as unacceptable for filing without further review. There will be

time enough after the applicable regulatory scheme is in place for Mtel to file any appropriate application.

Respectfully submitted,

PAGEMART, INC.

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November 15, 1993

Certificate of Service

I, Ginger S. Pribble, do hereby certify that copies of the foregoing Comments in Support of Emergency Motion to Return Mtel Application of PageMart, Inc. were served via first-class, postage prepaid mail, on this 15th day of November, 1993, to the parties listed below.

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