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November 23, 1993

C T I A Cellular Telecommunications Industry Association
1133 21st Street, NW
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Building The Wireless Future

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Ex Parte Filing
GEN Docket No. 93-252
Regulatory Treatment of Mobile Services

Dear Mr. Caton:

On Tuesday, November 23, 1993, the Cellular Telecommunications Industry Association ("CTIA") sent the attached letter, transmitting the Reply Comments filed by CTIA regarding GN Docket No. 93-252 (Regulatory Treatment of Mobile Services), to the FCC staff listed below.

Daniel Abeyta
Rudy Baca
Beverly Baker
Andrew Barrett
Thomas Beers
Lauren Belvin
James Bennett
Karen Brinkmann
Kelly Cameron
John Cimko
Rodney Small
Randy Coleman
Robert Corn-Revere
Diane Cornell
Ervin S. Duggan
Brian Fontes
Bruce Franca
David Furth
Bart Gorman
Sheldon Guttman
Ralph Haller
Jeffrey Hoagg
John Hollar
Reed Hundt
Stevenson Kaminer
Kimberly King
Evan Kwerel
Blair Levin
Kathy Levitz
Renee Licht
Byron Marchant
Steve Markendorff
Roland Martin
Geraldine Matise
Maura McGowan
Ruth Milkman
Tom Mooring
Kent Nakamura
Linda Oliver
Myron Peck
Dr. Robert Pepper
James Quello
David Reed
Jill Ross-Meltzer
Sarah Siedman
David Siddall
Richard Smith
David Solomon
Thomas Spavins
Merrill Spiegel
Dr. Tom Stanley
Gerald Vaughan
Greg Vogt
John Williams
John Winston

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The views expressed in this document reflect CTIA's position as previously filed in these proceedings.

If there are any questions in this regard, please contact the undersigned.

Sincerely,

Robert F. Roche

Enclosure

C T I A Cellular Telecommunications Industry Association
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Building The Wireless Future.

Thomas E. Wheeler
President/CEO

November 23, 1993

Dr. Thomas Stanley
Chief Engineer
Federal Communications Commission
2025 M Street, N.W. Room 7002
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 93-252
Regulatory Treatment of Mobile Services

Dear Tom:

On Tuesday, November 23, 1993, the Cellular Telecommunications Industry Association ("CTIA") filed Reply Comments regarding the Regulatory Treatment of Mobile Services (GEN Docket No. 93-252).

The record in this proceeding demonstrates that "Commercial Mobile Services" should be broadly defined to encompass all services that satisfy the statutory definition as well as all services that are *their functional equivalents*, i.e., all current common carrier services, functionally-equivalent specialized mobile radio (SMR) services, paging and most personal communications services (PSC) applications.

Broadly defining commercial mobile services so that all functionally similar services are subject to similar regulation will ensure that artificial disparities do not develop over time among similar services, and that Congress' intent to establish regulatory parity will be achieved.

The record also demonstrates that the level of competition existing within the commercial mobile services marketplace requires maximum forbearance from Title II regulation of commercial mobile services. Such forbearance (in the form of, at a minimum, detariffing of cellular and other commercial mobile services) will foster consumer interests, and avoid the imposition of significant and unnecessary costs through forbearance from unnecessary regulation.

Congressional intent, and the competitive nature of the commercial mobile services industry, support preemption of state regulation of interconnection terms, conditions and rates, with the burden of proof to be borne by any petitioner seeking to exercise such regulation.

To assist you in your efforts, I enclose a summary matrix generally describing interested parties' views, as expressed in their initial Comments in this proceeding, on these and other related issues.

By an overwhelming margin, most commenters agree with CTIA that through such definition, forbearance and preemption, the consumer interest in a competitive commercial mobile service market will be served.

Very Truly Yours,

Thomas E. Wheeler

Enclosures

November 23, 1993

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Building The Wireless Future

Thomas E. Wheeler
President/CEO

Dr. Robert Pepper
Chief, Office of Plans & Policy
Federal Communications Commission
1919 M Street, N.W. Room 822
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 93-252
Regulatory Treatment of Mobile Services

Dear Bob:

On Tuesday, November 23, 1993, the Cellular Telecommunications Industry Association ("CTIA") filed Reply Comments regarding the Regulatory Treatment of Mobile Services (GEN Docket No. 93-252).

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November 23, 1993

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Building The Wireless Future.

Thomas E. Wheeler
President/CEO

Commissioner Ervin S. Duggan
Federal Communications Commission
1919 M Street, N.W. Room 832
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 93-252
Regulatory Treatment of Mobile Services

Dear Ervin:

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Building The Wireless Future

Thomas E. Wheeler
President/CEO

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, N.W. Room 802
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 93-252
Regulatory Treatment of Mobile Services

Dear Jim:

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November 23, 1993

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Thomas E. Wheeler
President CEO

Chairman Reed Hundt
Federal Communications Commission
1919 M Street, N.W. Room 802
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 93-252
Regulatory Treatment of Mobile Services

Dear Reed:

On Tuesday, November 23, 1993, the Cellular Telecommunications Industry Association ("CTIA") filed Reply Comments regarding the Regulatory Treatment of Mobile Services (GEN Docket No. 93-252).

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November 23, 1993

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Building The Wireless Future

Thomas E. Wheeler
President CEO

Commissioner Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W. Room 826
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 93-252
Regulatory Treatment of Mobile Services

Dear Andy:

On Tuesday, November 23, 1993, the Cellular Telecommunications Industry Association ("CTIA") filed Reply Comments regarding the Regulatory Treatment of Mobile Services (GEN Docket No. 93-252).

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Very Truly Yours,

Thomas E. Wheeler

Enclosures

In the Matter of
Implementation of Sections 3(n) and 332 of the Communications Act
Regulatory Treatment of Mobile Services

Gen. Docket No. 93-252

Summary of Regulatory Parity Comments
Filed With the FCC
November 8, 1993

OVERVIEW OF REGULATORY PARITY COMMENTS

By an overwhelming margin, most commenters agree with CTIA that consistent regulatory treatment of Commercial Mobile Services ("CMS") will best foster competition and consumer interests; and most commenters agree that maximum detariffing of cellular and other CMS will best realize the competitive potential of the mobile services market.

Most cellular, cable, and telecommunications companies support a broad definition of CMS. For example, Ameritech, Cox, and NYNEX advocate defining CMS in a manner that eliminates the disparities among common carrier services and their functional equivalents. In addition, other wireless service providers, such as PacTel Paging, NEXTEL, and RAM Mobile Data also support a broad definition of CMS, recognizing that Congress intended private services that provide interconnected service to the public and are, therefore, the functional equivalent of existing common carrier mobile services, to be reclassified as CSM services.

Time Warner and Motorola, on the other hand, advocate that no single regulatory classification should apply to PCS because of the diversity of services and applications that PCS will entail.

With respect to comments regarding regulatory forbearance, most commenters strongly support the maximum amount of regulatory forbearance from Title II of the Communications Act. However, the California Public Utilities Commission, the New York Public Utilities Commission, MCI, NABER (with respect to dominant carriers), and NCRA urge the FCC not to totally forbear CMS from Title II regulation.

SUMMARY OF REGULATORY PARITY COMMENTS

COMMENTER	REGULATORY TREATMENT: CMS v. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
Advanced MobileCom Tech. and Digital Spread Spectrum (Joint Comments)	PCS: both CMS and Private Wide-Area SMR: CMS	Yes	No Position Stated	No Position Stated	No Position Stated
Aeuronatical Radio, Inc.	Aviation Services: Private	N/A	No Position Stated	No Position Stated	No Position Stated
AllCity Paging, Inc.	Paging: Private	N/A	No Interconnection Obligations	No Position Stated	No Position Stated
AMTA	Wide-Area SMR: CMS (if system capacity can attract broad subscribership, e.g., using frequency re-use and hand-off) Broadband PCS: CMS Analog SMR and other two-way Private Services: Private	Yes Yes Yes, if FCC decides to treat as CMS	No	No Position Stated	No Position Stated

Commenter	Regulatory Treatment: CMS v. Private	Maximum Title II Regulatory Forbearance	Favors Interconnection/ Equal Access Requirement	Favors State Regulation of Interconnection Rates	Elimination of Structural Separation Requirement
American Petroleum Inst. (API)	Private Land Mobile Service: Private (if 50% of mobile units used for licensee's internal operations)	N/A	N/A	Advocates continuation of cost-sharing or no cost arrangements	No Position Stated
Ameritech	Cellular and PCS: CMS	PCS: Yes, requests flexibility to offer both commercial and private services Cellular: Yes, requests same flexibility as PCS	Yes, interconnection necessary for maximum flexibility of service offerings	No Position Stated	Yes
Amer. Mobile Satellite Corp.	Mobile Satellite Services (MSS): CMS	Yes	No Position Stated	No Position Stated	Yes
Arch Communications Group, Inc.	Paging (whether or not store-and-forward), all Mobile Services* and PCS: CMS *includes Part 22 air-ground services, Part 25 MSS, commercial mobile marine and aviation services	Yes	No Position Stated	No Position Stated	No Position Stated

Commenter	Regulatory Treatment: CMS v. Private	Maximum Title II Regulatory Forbearance	Favors Interconnection/ Equal Access Requirement	Favors State Regulation of Interconnection Rates	Elimination of Structural Separation Requirement
American Assoc. of Railroads (AAR)	Railroad mobile radio systems: Private	N/A	No Position Stated	N/A	No Position Stated
Assoc. of Public-Safety Communications Officials-Int'l, Inc. (APCO)	Public safety agencies: Private	N/A	No Position Stated	N/A	No Position Stated
BellSouth	All CMS mobile services: PCS	Yes	Yes	Yes	No Position Stated
California PUC	PCS: To achieve maximum flexibility without complicated enforcement, prohibit PCS provider from offering both CMS and PMS services in same market	No	Yes	Yes, allow state regulation of equal access-type interconnection rates	No Position Stated

COMMENTER	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
CTIA	Cellular, PCS, most SMR, mobile satellite, mobile marine, aviation, and private land mobile: CMS* *advocates broad definition of CMS, and narrow interpretation of private mobile services	Yes	No	No	Yes
Cencall Corp. (SMR Provider) **concurs with AMTA**	Wide-Area SMR: CMS, if system capacity is expanded PCS: CMS	Yes, if ESMR determined to be CMS	No Position Stated	No Position Stated	No Position Stated
Century Cellunet, Inc.	Competitive Mobile Service Providers: Cellular, ESMR, and PCS: CMS	Yes	Minimum and Equal	Yes	No Position Stated
CelPage, Denton, Network USA, Copeland (Joint Comments)	Private Carrier Paging: Private, even though interconnected because it is not a "functionally equivalent" commercial mobile service	N/A	Yes	No	No Position Stated

Commenter	Regulatory Treatment: CMS v. Private	Maximum Title II Regulatory Forbearance	Favors Interconnection/ Equal Access Requirement	Favors State Regulation of Interconnection Rates	Elimination of Structural Separation Requirement
ComCast Corp.	Cellular and PCS: CMS	Yes	No, but Commission should require LECs to file intrastate interconnection tariffs and contracts for billing and collection to prevent discrimination	Interconnection: Yes Equal Access: No	No
Corporate Technology Partners	PCS: both CMS and Private; seeks co-carrier status in order for PCS operator can provide full services like a telephone company	Yes	Interconnection: Yes	No Position Stated	No Position Stated
Cox Enterprises	Cellular, ESMRs, and PCS: CMS	Yes	Yes, but Commission can require filing of LEC interconnection tariffs Equal Access: No	No	No

Commenter	Regulatory Treatment: CMS v. Private	Maximum Title II Regulatory Forbearance	Favors Interconnection/ Equal Access Requirement	Favors State Regulation of Interconnection Rates	Elimination of Structural Separation Requirement
D.C. Public Service Commission	Wide-Area SMR, Wide-Area PCS, and common carrier mobile services*: CMS *cellular, paging, and SMR wide-area wireless	No Position Stated	No Position Stated	Yes	No Position Stated
E.F. Johnson Company radio manufacturer and SMR licensee	Traditional SMR and systems not offered "for profit" or "interconnected": Private	N/A	No Position Stated	No Position Stated	No Position Stated
Geotek Indus.	Traditional SMR (dispatch and customized services): Private	No Position Stated	No Position Stated	No Position Stated	No Position Stated
General Communications	PCS, cellular, Wide-Area: CMS* *advocates broad definition of CMS, and narrow interpretation of private mobile services	No* *Dominant carriers and affiliates should not be exempt, although non-dominant carriers should be exempt	Yes	Yes, states should be allowed to petition for request to regulate interconnection rates	No

Commenter	Regulatory Treatment: CMS v. Private	Maximum Title II Regulatory Forbearance	Favors Interconnection/ Equal Access Requirement	Favors State Regulation of Interconnection Rates	Elimination of Structural Separation Requirement
Grand Broadcasting	Interactive Broadcast Radio Service: Private Cellular, PCS: CMS	No Position Stated	Yes	No Position Stated	No Position Stated
GTE	Cellular, PCS, ESMR, and other common carrier services: CMS	Yes	Interconnection: Yes Equal Access: No	No Position Stated	Yes
Hardy & Carey (law firm)	Seeks clarification of regulatory classification of PCS provided over FM subcarrier channels	No Position Stated	No Position Stated	No Position Stated	No Position Stated
Illinois Valley Cellular	PCS: CMS	No Position Stated	No	No Position Stated	No Position Stated
Independent Cellular Network	Cellular, PCS, SMR: CMS* *dispatch service should be permitted	No Position Stated	No Position Stated	No Position Stated	No Position Stated
Industrial Telecom. Assoc. (formerly Special Industrial Radio Assoc.)	Industrial Radio: Private	No Position Stated	No Position Stated	No Position Stated	No Position Stated

Commenter	Regulatory Treatment: CMS v. Private	Maximum Title II Regulatory Forbearance	Favors Interconnection/ Equal Access Requirement	Favors State Regulation of Interconnection Rates	Elimination of Structural Separation Requirement
In-Flight Phone (air-ground licensee)	Air-ground radio: CMS	Yes, exempt all air-ground providers with no dominant carrier affiliations	No Position Stated	No Position Stated	No, institute separate NPRM to define new regulatory structure
Jan Reed (private citizen)	IVDS: CMS* Petitioner requests change in designation, arguing that FCC proposed IVDS to be "fixed service"	No Position Stated	No Position Stated	No Position Stated	No Position Stated
Liberty Cellular	Cellular, PCS: CMS	No Position Stated	Equal Access: Do not impose requirement on PCS or other CMS providers, except as required of LECs and GTE	No Position Stated	No Position Stated
Lower Colorado River Authority	Land mobile service operated on non-profit, shared basis: Private	N/A	No Position Stated	No Position Stated	No Position Stated
Metricom	Unlicensed PCS services are neither and should not be included in purview of CMS v. PMS issue	N/A	N/A	N/A	N/A

Commenter	Regulatory Treatment: CMS v. Private	Maximum Title II Regulatory Forbearance	Favors Interconnection/ Equal Access Requirement	Favors State Regulation of Interconnection Rates	Elimination of Structural Separation Requirement
McCaw Cellular	Cellular, Paging (incld. store-and-forward), PCS: CMS	Yes	No	No	No Position Stated
MCI	Cellular, PCS: CMS	No	Yes	No Position Stated	Yes
Mobile Telecom. Technologies Corp. (Mtel)	Cellular, air-ground, all SMRs, all paging (incld. store-and-forward), satellite, and PCS: CMS	Yes	No Position Stated	No Position Stated	No Position Stated
Motorola	Cellular, ESMR, Parts 22 and 90 Paging: CMS All PCS (narrow- and broadband): CMS or Private SMR, Gov't/Public Safety, Internal Paging, IMTS, Non-Profit Sharing, and Ancillary Offerings to 3rd Parties: Private	Yes Yes N/A	Interconnection: Yes	No, but if State makes proper showing, requests FCC to resolve petitions expeditiously	No Position Stated