

BRYAN CAVE

ST. LOUIS, MISSOURI
LOS ANGELES, CALIFORNIA
NEW YORK, NEW YORK
PHOENIX, ARIZONA
KANSAS CITY, MISSOURI

700 THIRTEENTH STREET, N.W.
WASHINGTON, D.C. 20005-3960
(202) 508-6000
FACSIMILE: (202) 508-6200

IRVINE, CALIFORNIA
SANTA MONICA, CALIFORNIA
OVERLAND PARK, KANSAS
LONDON, ENGLAND
RIYADH, SAUDI ARABIA
FRANKFURT AM MAIN, GERMANY

CARL W. NORTHROP

DIRECT DIAL NUMBER
(202) 508-6152

January 4, 1994

PR 93-35

Ralph A. Haller, Chief
Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, DC 20554

Re: PacTel Paging Request for
Waiver of Section 90.495(a)(5)

RECEIVED
JAN 5 1 21 PM '94

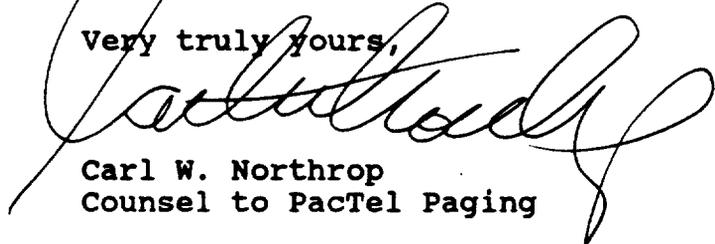
Dear Mr. Haller:

This letter is being submitted on behalf of PacTel Paging, the company prosecuting the above-referenced waiver request filed with the Commission December 23, 1993.

The subject waiver is supported by the Declaration of James R. Lawson, Vice President - Technical Operations for PacTel Paging. The original waiver was supported by a facsimile version of Mr. Lawson's declaration in the interest of making the submission at the earliest practicable date. Attached hereto is the signed original declaration of Mr. Lawson. We respectfully request that this signed original be associated with the subject waiver request.

Kindly refer any questions in connection with this matter to the undersigned.

Very truly yours,



Carl W. Northrop
Counsel to PacTel Paging

CWN/tcm DC01 0067493.01

cc: Beverly G. Baker, Esquire
David L. Furth, Esquire
Rosalind K. Allen, Esquire
Terry L. Fishel, Esquire (by facsimile)

DECLARATION

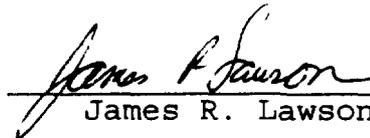
I, James R. Lawson, do hereby declare that:

1. I am the Vice President - Technical Operations for PacTel Paging.

2. I am familiar with the exact contents of the foregoing "Request For Waiver".

3. Except for the facts of which official notice may be taken, the facts set forth therein are true and correct to the best of my knowledge, information and belief.

This declaration is given this 23rd day of December, 1993, under penalty of perjury under the laws of the United States.


James R. Lawson

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

93-35

DEC 23 2 04 PM '93
RECEIVED

In the Matter of

**REQUEST OF PACTEL PAGING FOR A
WAIVER OF SECTION 90.495(A)(5) TO
ALLOW PACTEL PAGING ADDITIONAL TIME
TO TRANSITION TO DEDICATED TRANS-
MITTERS**

To: The Private Radio Bureau

REQUEST FOR WAIVER

PacTel Paging and its affiliates¹ (collectively "PacTel"), by their attorneys and pursuant to Section 90.151 of the Commission's Rules, hereby respectfully request a temporary waiver of Section 90.495(a)(5) of the Commission's Rules. The waiver seeks to accord PacTel twenty-four months to convert certain existing private carrier paging ("PCP") systems from the use of multifrequency transmitters to dedicated transmitters while retaining exclusivity under the Amendment of the Commission's Rules to Provide Channel Exclusivity to Qualified

¹ PacTel Paging's affiliates include PacTel Paging of California, PacTel Paging of Texas, PacTel Paging of Kentucky, and PacTel Paging of Virginia.

Private Paging Systems at 929-930 MHz.^{2/} In support of this request, PacTel shows the following:

I. INTRODUCTION

1. PacTel has grown to become the fourth largest paging company in the United States, providing service to over 1,100,000 units in service. PacTel currently provides local and regional one-way paging services in 100 Metropolitan Statistical Areas ("MSAs") throughout the nation with an estimated population of over 80 million. By industry estimates, PacTel is one of the fastest growing paging companies in the United States, with an annual growth rate in excess of 35 percent.

2. In 1992, PacTel discovered that many of its subscribers were demanding nationwide and regional coverage that extended beyond PacTel's then existing coverage areas. Since clear common carrier paging frequencies were not available over these larger regions or nationwide, PacTel applied for and received more than 800 Part 90 PCP authorizations for regional and nationwide frequencies.^{3/} PacTel currently holds authorizations for 929.8875 MHz in two distinct regions (West/Southwestern United States, and Central/Southeastern United

² FCC 93-479 (released November 17, 1993) ("Order").

³ As is discussed in greater detail within, the regional and nationwide systems serve distinct subscriber needs and, as a result, employ different system architectures. See discussion infra at para. 8.

States)⁴ and 929.9375 MHz on a nationwide basis. Since receiving its initial authorizations, PacTel has initiated service to the public on its regional and nationwide PCP paging systems from over 527 base station transmitters.⁵ All of these base stations are constructed using multifrequency transmitters serving more than one PCP frequency.

3. In the Notice of Proposed Rulemaking⁶ that preceded the Order, the Commission proposed that PCP licensees could earn exclusivity if they met certain construction and coverage requirements.⁷ The proposed rules would not have prohibited licensees from using multifrequency transmitters to meet the requirements.⁸ Because of the substantial public interest benefits of using frequency-agile transmitters, and the expectation created by the Notice, PacTel constructed its

⁴ PacTel's two regions are defined as follows: West/Southwest includes Washington, Oregon, California, Nevada, Arizona, New Mexico, Texas, Oklahoma, Arkansas, Louisiana, Mississippi, and Alabama; Central/Southeast includes Wisconsin, Illinois, Missouri, Michigan, Ohio, Indiana, Kentucky, Tennessee, North and South Carolina, Georgia, and Florida.

⁵ In order to expedite its provision of nationwide service to the public, PacTel entered into an Interconnection Agreement with other carriers pursuant to which PacTel's nationwide 929.9375 MHz frequency is transmitted in areas of the country where PacTel does not otherwise conduct operations.

⁶ Notice of Proposed Rulemaking, PR Docket 93-35, 8 FCC Rcd 2227 (1993) ("Notice").

⁷ These requirements are outlined in Section 90.495(a)(1)-(3).

⁸ This conclusion flows primarily from the Commission's silence on how the Commission would count multifrequency transmitters to meet the requirements.

extensive PCP systems using multifrequency transmitters and began offering service to the public. PacTel already has expended more than \$9 million in these PCP operations. PacTel currently offers service to over 195,000 units on its regional and nationwide PCP frequencies. Service is being provided at the present time to 94 of the top 100 MSAs. Absent Section 90.495(a)(5), PacTel would qualify for exclusivity on both of its PCP frequencies at the present time.⁹

4. However, during the comment period in the PCP exclusivity docket, PageMart suggested that the Commission revise its proposed rules to limit the counting of multifrequency transmitters.¹⁰ Many commenters, including PacTel, disagreed with PageMart's proposal.¹¹ Nevertheless, the Commission adopted PageMart's proposed rule changes and inserted a new

⁹ Attached as Exhibit A is a report showing that PacTel has met the requirements for exclusivity on its nationwide channel. Attached as Exhibit B is a similar report showing that PacTel has met the requirements for exclusivity on its regional frequency in the two regions.

¹⁰ PageMart's argument only addressed whether a licensee could receive credit for constructing a single facility on two frequencies with identical coverage (e.g., two nationwide channels). PacTel's situation, however, is substantially different. PacTel has a regional frequency and a nationwide frequency. Each of these frequencies serves different markets and the rationale used to limit the counting of multifrequency transmitters for identical coverage areas does not necessarily support limiting the counting of multifrequency transmitters for different coverage areas.

¹¹ The opposing commenters cited numerous public interest benefits that multifrequency transmitters would promote, including (1) reduced time to introduce service to the public, (2) reduced civic and environmental concerns, and (3) reduced operating costs from less site rent and equipment depreciation.

Section 90.495(a)(5) which prohibits licensees from counting multiple frequency transmitters toward exclusivity on multiple frequencies.^{12/} As a result, even though PacTel already provides PCP service to the public from over 527 transmitters on its two frequencies, PacTel will nonetheless need to add an additional 180 transmitters in order to meet the dedicated transmitter requirement.^{13/} Because of the substantial number of additional transmitters required to meet the dedicated transmitter rule, and the absence of a transition rule,^{14/} PacTel will need a temporary waiver of the multifrequency transmitter rule for twenty-four months.^{15/}

¹² The new rule reads as follows:

Frequency-agile transmitters may be counted no more than once for the purposes of this section. A licensee using frequency-agile transmitters may qualify for exclusivity on a second frequency by constructing twice the number of transmitters required to obtain exclusivity on a single frequency, provided all other requirements of this section are met.

¹³ Of the 527 PCP transmitters from which PacTel provides nationwide and regional PCP service, 265 are owned and operated by PacTel, and the remainder are in service pursuant to the Interconnection Agreement. See note 5, supra. This is the basis of PacTel's calculation that it needs to own and operate approximately 180 additional transmitters to meet the dedicated transmitter counts for one nationwide channel and two regions.

¹⁴ The rules provide grandfathered exclusivity for stations already constructed with dedicated transmitters, and a slow growth option for new applications. What is missing is a transition plan to allow licensed systems, such as PacTel's, to convert from multifrequency transmitter uses to dedicated transmitters.

¹⁵ The Order creates some uncertainty regarding the period of time that "grandfathered" licensees have to come into compliance with the dedicated transmitter rule. The initial
(continued...)

II. WAIVER SOUGHT

5. PacTel seeks a temporary waiver of Section 90.495(a)(5) of the Commission's Rules to accord PacTel twenty-four months to add the 180 dedicated transmitters that are required in order to retain exclusivity for its regional and nationwide systems under Section 90.495(a)(5).^{16/} In order to meet the twenty-four month period, PacTel will add 90 transmitters in 1994 and 90 transmitters in 1995.^{17/}

^{15/}(...continued)

submission to NABER can include pending and unconstructed stations (provided that they meet the October 14, 1993, FCC application cut-off date.) However, because of the dynamic nature of the application and construction process, the facilities ultimately placed in service could vary from those initially designated. In discussions with the Private Radio Bureau, PacTel has been advised that the Bureau is accepting of such changes as long as a grandfathered licensee has the requisite number of dedicated transmitters in service no later than 8 months following the Commission's grant of exclusivity. PacTel understands that the Public Notice of the exclusivity grant will so indicate.

^{16/} Some of the 180 transmitters will be placed in service at existing sites now operated on a multifrequency basis. Others will be added at new locations to expand the geographic coverage of PacTel's system.

^{17/} PacTel expects to continue its Interconnection Arrangement with its co-carriers even after it completes construction of a sufficient number of dedicated transmitters to qualify for exclusivity under Section 90.495 until PacTel's capacity needs dictate dedicated facilities in all areas. Continuing the arrangement will serve the public interest by allowing PacTel to offer a depth and breadth of coverage not possible in the absence of the cooperative co-carrier arrangement.

III. A GRANT OF PACTEL'S WAIVER IS APPROPRIATE

6. PacTel's waiver request is appropriate and a grant will serve the public interest. The Commission has stated that a waiver is appropriate if the applicant can show special circumstances that warrant a deviation from the general rule.^{18/} PacTel believes that its circumstances justify a waiver because a grant to it would not undermine the rationale behind Section 90.495(a)(5), and because good cause is shown.

7. The Commission adopted Section 90.495(a)(5) to discourage warehousing and speculation by licensees.^{19/} A grant of PacTel's waiver, however, would not lead to speculation or warehousing. PacTel is a serious operator, with over 500 base station facilities in service on its PCP frequencies, and PacTel currently is offering service to over 195,000 units on those frequencies. Since PacTel already has expended in excess of \$9 million on the provision of PCP service, and is committed to the additional investment required to convert to the use of dedicated transmitters under Section 90.495(a)(5) of the rules, the Commission may grant the relief requested without fear that it is

¹⁸ See WAIT Radio v. FCC, 418 F.2d 1153 (D.C. Cir. 1969); In re Request of Fleet Call, Inc. for a Waiver and Other Relief to Permit Creation of Enhanced Specialized Mobile Radio Systems in Six Markets, 6 FCC Rcd 1533 (1991). Alternatives other than a waiver will not serve the public interest as well as granting PacTel's requested waiver. A proceeding instituted by a Notice of Proposed Rulemaking would be decided long after PacTel is obligated to construct its nationwide and regional PCP systems, thus delaying service to the public.

¹⁹ Order, paras. 16-17.

aiding a speculator. In the meantime, PacTel's use of multifrequency transmitters permitted it to offer service to the public earlier than would otherwise have been possible and with lower initial start-up and operating costs. These factors, of course, benefit the public and do not contribute to warehousing or speculation.

8. The nature of PacTel's PCP operations also indicates that warehousing is not taking place. In selecting channels for its regional operations, PacTel has taken the spectrum-conservative approach of selecting a common frequency -- 929.8875 MHz -- in each of the two regions, rather than seeking to preempt separate channels. And, while PacTel proposes to dedicate a different frequency to nationwide use, this is being done for good reason due to the differing nature of the nationwide and regional markets. Market research indicates that the nationwide market is a potentially large and growing market dominated by executives who need to be in touch when they are out of town on business. The needs of this market can often be met with a system architecture designed to provide "traveller's coverage" (i.e., coverage of airports, along major traffic corridors and in the core business districts of major metropolitan areas). In contrast, regional customers are more likely to be regionally based businesses that require a depth of coverage that extends to outlying areas. There are sound business reasons for seeking to meet these diverse customer needs

on dedicated frequencies in which the marketing, engineering and pricing considerations are vastly different.

9. Notably, the multifrequency transmitter rule was adopted for the explicit purpose of preventing licensees from claiming "multi-channel exclusivity with no more investment than is required to earn single-channel exclusivity".^{20/} The circumstances here conclusively demonstrate that this is not a concern in PacTel's case. By the Commission's own calculations, the investment deemed sufficient to qualify for nationwide exclusivity on one channel is \$6,000,000.^{21/} The investment required to qualify for regional exclusivity in two regions would be \$2,800,000.^{22/} PacTel, with an investment to date of over \$9 million, already has expended in excess of the benchmark amounts established by the Commission as evidence of a sufficient commitment to warrant multiple channel exclusivity. Thus, PacTel's waiver does not violate the spirit of the rule.

10. Unfortunately, PacTel is unable to convert its facilities from the use of frequency-agile to dedicated transmitters within the timeframes required by the Order because of the unavailability of transmitters and manpower.^{23/} PacTel

²⁰ Order, para. 17.

²¹ At note 44 of the Order the Commission accepts \$20,000 as the average cost per transmitter, meaning that it expects a 300-transmitter system to cost \$6,000,000.

²² 70 transmitters per region X \$20,000 per transmitter X 2 regions = \$2,800,000.

²³ PacTel would expect this date to be no later than the end of 1994. See note 10, supra.

has been in touch with the major suppliers of 929 MHz base station transmitters, and has concluded that it would be difficult, if not impossible, to secure in time the minimum 180 transmitters necessary for PacTel to meet the requirements of Section 90.495(a)(5).^{24/} Because of the new exclusivity rules, and the restrictions on the counting of multifrequency transmitters, manufacturers will be asked to supply thousands of transmitters for next year above the normal requirements of the industry. This will impose a significant logjam for licensees trying to obtain transmitters.

11. Even if PacTel were able to take delivery of the necessary equipment, it has a relatively limited technical staff to devote to the task of adding transmitters, which precludes it from being able to add in the available time the additional transmitters needed to satisfy the Order.^{25/} Even with the use of outside contractors to do the work, it is doubtful that PacTel

²⁴ Manufacturers are naturally reluctant to admit that they cannot fulfill a large order. Nevertheless, Motorola has acknowledged in writing the difficulties that the exclusivity rules will generate. See Exhibit C. Glenayre has been even more forthcoming, indicating to its major customers that the manufacturing queue would not enable the company to fill many large orders until late 1994. PacTel's experience indicates that actual delivery dates would likely extend well beyond these manufacturer projections.

²⁵ PacTel traditionally has used its own personnel to construct transmitters to ensure that they meet the Commission's Rules and the authorization. However, PacTel's staff, in line with the rest of the company's effort to minimize overhead, is extremely lean. PacTel's existing technical personnel could not construct the required number of transmitters by the required date. Even if they could, it would be at the sacrifice of ongoing technical obligations with respect to existing systems.

could meet the deadlines because of the demands of other licensees for the services of those contractors. In sum, even if PacTel tried to meet the Section 90.495(a)(5) deadline, it could not because of a lack of transmitters and personnel.

IV. A GRANT OF PACTEL'S WAIVER WILL SERVE THE PUBLIC INTEREST

12. A grant of PacTel's waiver will serve the public interest for several reasons. First, a grant would permit an orderly construction of the required transmitters. Without the waiver, PacTel will be forced to attempt to require Motorola to produce and/or deliver transmitters for PacTel ahead of others in the industry to meet the deadline. If Motorola agreed to do this, which is doubtful, this could slow construction of other facilities to serve the public. PacTel would also have to forego routine maintenance and repair of its extensive existing systems which are providing service to the public, if forced to devote all available technical personnel to construct the transmitters necessary to meet the artificial deadline imposed by Section 90.495. Such a result obviously would not serve the public interest.^{26/}

²⁶ The Commission adopted a three-year slow-growth extension to new licensees based upon the Commission's view that it may take this long to construct a system of more than 30 transmitters. The Commission, however, balanced this requirement against the need to prevent speculation and warehousing. PacTel's waiver request is at least as meritorious as a request for slow-growth status by a new applicant without any prior Commission history. PacTel already has constructed over half of the required number of transmitters, and is committing to a shorter period than 3
(continued...)

13. Second, service to the public might be impaired if PacTel's waiver is not granted. PacTel is currently offering service to the public on its PCP systems. If PacTel is unable to construct its systems within the deadline and, as a consequence, loses its exclusivity, PacTel could be forced to share its frequency with others. As the commenting parties to the Notice pointed out, it would be extremely difficult to share nationwide and regional frequencies with other licensees. For instance, PacTel's nationwide and regional systems are centrally controlled via satellite. A co-channel licensee seeking to share the channel would be required to interconnect its facilities with PacTel's at PacTel's uplink facilities. This would be extremely difficult. If PacTel is forced to share, service to the public would be jeopardized because PacTel would have limited capacity and the problems attendant with sharing as well as a limited ability to expand its geographic coverage.²⁷

14. Finally, and perhaps most importantly, a grant will foster competition. The temporary relief PacTel is seeking

²⁶(...continued)

years to complete construction. PacTel also will be providing service throughout the construction period using multifrequency transmitters. Lastly, PacTel has invested an amount already in excess of the bond requirements for new applicants set forth in the Commission's Rules.

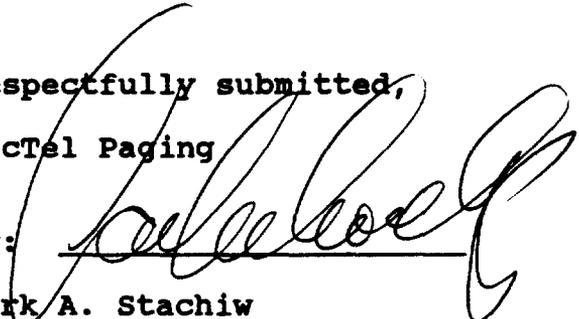
²⁷ The geographic service area of paging service is constantly evolving, with an ever-increasing need for more and more geographic coverage. Over the past several years, the market has demanded that the geographic service area grow from metropolitan areas, to statewide coverage, to multistate and nationwide geographic coverage. PacTel expects this trend to continue.

will enable PacTel -- a well-qualified service provider -- to obtain the channel exclusivity that is necessary for it to compete on an equal footing with other common and private paging carriers who are providing nationwide and multiple-state regional services throughout the areas PacTel is seeking to serve.

V. CONCLUSION

Based upon the preceding showings, PacTel respectfully requests the Commission to immediately grant the waiver sought herein.

Respectfully submitted,
PacTel Paging

By: 

Mark A. Stachiw
Carl W. Northrop

Its Attorneys

Mark A. Stachiw
PACTEL PAGING
Suite 800
12221 Merit Drive
Dallas, Texas 75251
(214) 458-5200

Carl W. Northrop
BRYAN CAVE
Suite 700
700 13th St., N.W.
Washington, D.C. 20005
(202) 508-6000

December 23, 1993

Explanation of Reports

The following report show that the frequency listed at the top thereof meets the exclusivity requirements set forth in Section 90.495(a) on a multifrequency basis.

Report Description: The report is sorted according to the second-line status designation and is a listing of EACH, INDIVIDUAL transmitter that is either: operating; under the 8-month construction period; has an application pending at the Commission; or, is in coordination by NABER. Each status is defined below.

Status Definitions: The report's Second-line status designators are defined below.

Type: Status: - Definition

Type: AUTH Status: LIC - The facility is licensed and operating.

Type: FILED Status: CP - A license document has been issued, but the facility has not yet been constructed and the 8-month construction period has not expired.

Type: FILED Status: NABER - An application is currently under going NABER coordination.

Type: FILED Status: PEND - An application has completed the NABER coordination process and been filed with the Commission.

Type: FILED Status: PREOPR - An application has completed the NABER coordination process and been filed with the Commission and the transmitter is operating under Form 572C.

Type: PROPOSED Status: DALL - Engineering has been submitted to PacTel's Technical Operations at Dallas, TX Headquarters and an application is being prepared for filing.

First Line Headings and Definitions: The first line headings on the report are listed and defined below.

State: State of Operation

Main City: The primary city as listed in the Commission's Top 100 MSA's

Top 100 Markets: This is the market number as defined by the Commission's Top 100 MSA's listing

Call Sign: This is the call sign designator. If an application is pending for a new station the call sign is PacTel's designator, NEW-001 - NEW-999.

FCC File # or NABER CNTRL #: If a station authorization has been issued this number is the FCC File Number. If an application is at NABER for coordination or PENDING at the Commission, this number is the NABER Control number, with an "N" at the end to indicate it is the NABER Control number.

Status Date: As set forth in the following table, this date, depending on the status, defines: the date a transmitter went into service; the end of the 8-month construction period; the date an application was submitted to NABER; or the date NABER filed the

application with the Commission.

Type: AUTH Status: LIC - This is the date the transmitter went into service.

Type: FILED Status: CP - This is the date the 8-month construction period ends. The facility must be constructed by this date or the authorization will be cancelled.

Type: FILED Status: NABER - This is the date the application was sent to NABER for coordination.

Type: FILED Status: PEND - This is the date the application was filed with the Commission, according to NABER documentation.

Type: FILED Status: PREOPR - This is the date the transmitter went into service, after receiving NABER's notice that coordination had been completed and the application filed with the Commission.

Type: PROPOSED Status: DALL - This is the anticipated date for the completion of the application.

Site Name: This is PacTel's internal name for the transmitter location.

Latitude - Longitude: 27 NAD coordinates for the transmitter location.

Base Desig: This is PacTel's internal documentation to indicate whether the transmitter will be counted as part of PacTel's Regional or Nationwide system.

Mark #: This is PacTel's internal documentation of market area served.

PacTel Site ID: Each facility is assigned a PacTel Internal identifier.

EXHIBIT A

PacTel Paging
Naber Nationwide Exclusivity Request

Exhibit A
Page 1

12/22/93

Frequency : 929.9375 Mhz

State	Main City	Top 100 Markets	Call Sign	FCC File # or Naber Cntrl #	Status Date	Site Name	Latitude	Longitude	Base Desig.	Mark. #	PacTel Site ID
		Type : AUTH		Status: LIC							
	Washington D. C.	8	WPDH-815	9305624904	10/01/93	WDC (1ST PLACE)	38-57-17	77- 0-18		8	NEA1208
			WPDI-995	9307628987	11/12/93	WDC (NATIONAL PRESS)	38-53-47	77- 1-54		8	NEA1265
AL	State of AL	41,77	WNYI-790	9210613387	4/26/93	OAK MOUNTAIN	33-46-49	86-36-14		41	ATL2121
					7/23/93	MONTGOMERY	32-22- 4	86-15-43			COR1085A
						HUNTSVILLE MTN.	34-40-49	86-30-54			COR1086A
					9/24/93	BIRMINGHAM 1	33-33-35	86-42-10		41	COR1088A
			WPCQ-963	9304623231	8/23/93	WKSJ	30-44-44	88- 5-40		77	COR1200
AR	State of AR	85	WNYI-815	9302619765	7/15/93	LITTLE ROCK	34-44-38	92-16-32		85	COR1101
			WPCS-866	9304622768	8/18/93	BENTONVILLE	36-23-36	94-10-53			DFW2154
AZ	Phoenix	26	WNSN-277	9309632147	10/28/93	YUMA	32-42-10	114-36-38			PHX2010A
			WPAJ-485	9212616476	11/27/93	SACATON	33- 0- 4	111-40-29			PHX2018
						SEDONA	34-51- 4	111-47-12			PHX5001
						DEVILS HEAD	35-14-30	111-36-33			PHX5002
			WPBS-474	9309631939	12/02/93	PACTEL OFFICE	33-27-11	112- 4-48		26	ARZ1029B
						SHAW BUTTE 2	33-35-39	112- 5- 6		26	ARZ1030B
						SOUTH MOUNTAIN	33-20- 4	112- 3-41		26	ARZ1031A
						USERY PASS	33-29-36	111-38-26		26	ARZ1120A
						WHITE TANKS MTN.	33-34-32	112-34-42		26	ARZ1121A
	Tucson	71	WNFB-803	9301617887	3/24/93	TUMOMOC 4	32-12-44	111- 0-19		71	TUC2007A
					6/03/93	ELDORADO	32-14-23	110-51-17		71	TUC2004
						HOSPITAL					
						SIERRA VISTA	31-33-20	110-17-41			TUC2005
						NOGALES	31-20- 0	110-56- 4			TUC2006
			WPAJ-485	9212616476	11/08/93	MULE MOUNTAIN	31-28-49	109-57-30			TUC2010
CA	Los Angeles	2,68,89	WNQU-877	9201570424	3/11/92	BLUE RIDGE	34-20-59	117-40-27			LAX2015
						SANTA YNEZ 2	34-31-37	119-58-40			LAX2032
						MCKITTRICK	35-16-51	119-44-52			LAX2062
						EDOM HILL	33-51-57	116-25-56			SND1241A
						HAUSER MTN.	34-32-50	118-12-43		2	SND1243
			WNRS-605	9307628102	9/08/93	SOUTH MOUNTAIN	34-19-32	119- 2-18		68	LAX2006
						BLUE MTN.	34- 1-20	117-17-46			SND1242
						SNOW PEAK	34- 2-17	116-48-47			SND1246
						RINCON PEAK	34-22-20	119-25-13		68	SND1247
						SAN CLEMENTE	33-25-53	117-35-47			SND1248
					12/03/93	SIERRA PEAK 1	33-51- 1	117-39-10		2	LAX2012B
			WNRS-609	9207597864	8/24/92	SIGNAL PEAK	33-36-22	117-48-40			SND1262
					8/25/92	JOHNSTONE PEAK	34- 9-30	117-47-30		2	LAX2024
						VERDUGO 2	34-12-52	118-16-28		2	SND1122A
						CULVER CITY	34- 0-51	118-22-43		2	SND1240
						OAT MTN.	34-19-30	118-34-36		2	SND1244
				921950035N	4/01/93	PALOS VERDES 2	33-46- 0	118-22-30		2	SND1113

PacTel Paging
 Naber Nationwide Exclusivity Request

12/22/93

Frequency : 929.9375 Mhz

State	Main City	Top 100 Markets	Call Sign	FCC File # or Naber Cntrl #	Status Date	Site Name	Latitude	Longitude	Base Desig.	Mark. #	PacTel Site ID
		Type: AUTH		Status: LIC							
CA	Los Angeles	2,68,89	WNRS-610	9205588260	7/01/92	SAGE PEAK	34-14-39	118-40-20		2	LAX2005
						LA HABRA	33-58-24	117-56-31		2	LAX2026
						RAZNOW PEAK	34- 9-51	118-54- 6		68	SND1239
			WNSN-277	9309632147	10/28/93	ELSINORE PEAK	33-36- 8	117-20-35			LAX2019
						PACIFICA	33-46-25	118- 1-59		2	LAX2029
						RIO HONDA	34- 1- 1	118- 0-51		2	LAX2031
						PASADENA #2	34- 9- 4	118- 8- 1		2	LAX2065B
						CASTRO PEAK	34- 5- 9	118-47- 5		2	SND1245
			WNSS-863	9201570469	3/11/92	TASSAJERA PEAK	35-23-41	120-42-25			LAX2003A
						YUCCA VALLEY1	34- 4-55	116-20-32			LAX2008
						ANZA	33-29-38	116-47-49			LAX2014
						FLASH II	34-58-17	117- 2-22			LAX2020
						MT. ADELAIDE	35-25-47	118-44-56		89	SND1237A
						MECCA HILLS	33-39-23	115-59-28			SND1249
			WNSS-864	9201570471	3/11/92	MT. SOLOMON	34-50- 5	120-22-56			LAX2000
						BALD MTN.	34-44-41	118-43-49			LAX2001
						HEAPS PEAK	34-14- 3	117- 8-25			LAX2022
						QUARTZITE MTN.	34-36-37	117-17-12			LAX2030
			WNUB-760	9306625626	8/27/93	DIAMOND BAR	33-56-48	117-49-18		2	LAX2017
						KXEZ	34- 7- 8	118-23-30		2	LAX2025
						MARRIOT AHN	33-48- 3	117-55- 0		2	LAX2027
						MARRIOT LAX	33-56-46	118-23- 4		2	LAX2028
						CENTURY CITY	34- 4- 2	118-25-35		2	LAX2119
					12/03/93	GIBRALTAR HILL	34-27-57	119-40-37		68	LAX2259
			WNUR-318	9109556414	12/04/91	SANTA ANA-MTSSO	33-42-56	117-54-31		2	LAX2004
						BOX SPRINGS	33-57-42	117-16-47			LAX2016
						LAGUNA PEAK	34- 6-45	119- 3-38		68	LAX2050
						LOOP CANYON	34-21- 0	118-24-25		2	LAX2051
						SIGNAL HILL	33-47-59	118- 9-48		2	LAX2052
			WNUR-959	9210613371	12/07/92	GLEN AVON	34- 1-45	117-29-53			LAX2021A
						HILL STREET	34- 2-58	118-15- 2		2	LAX2023A
						RED MTN. #2	34-20-57	119-20- 7		68	LAX2141A
						SIXTH STREET	34- 3-12	118-15-38		2	LAX2144A
			WNXU-323	9109556413	7/09/92	SKYLINE PEAK	34-13-41	117- 6-48			LAX2054
						SANTIAGO PEAK	33-42-38	117-32- 0			LAX2055
			WNZA-228	9308629882	12/02/93	WOODLAND HILLS	34-10-42	118-36-10		2	LAX2261
	San Diego	18	WNQU-877	9201570424	3/11/92	MT. PALOMAR	33-18-32	116-50-38			SND1258
			WNRN-892	9201570420	4/08/91	SAN MIGUEL	32-41-48	116-56-10		18	SND1253
					4/08/92	SAN MARCOS MTN 1	33-12-53	117-11-15		18	SND1257
						MT. WOODSON	33- 0-34	116-58-11		18	SND1259
						MT. SOLEDAD 1	32-50-21	117-14-57		18	SND2004
			WNRS-607	9107549872	11/07/91	RED MTN	33-24- 1	117-11-24			SND1250
						LAJOLLA	32-50-49	117-16-20		18	SND1251
						BLACK MTN.	32-58-52	117- 6-53		18	SND1252

PacTel Paging
Naber Nationwide Exclusivity Request

Exhibit A
Page 3

12/22/93

Frequency : 929.9375 Mhz

State	Main City	Top 100 Markets	Call Sign	FCC File # or Naber Cntrl #	Status Date	Site Name	Latitude	Longitude	Base Desig.	Mark. #	PacTel Site ID
CA	San Diego	18	WNRS-607	9107549872	11/07/91	CHAMBER BUILDING	32-43- 1	117- 9-48		18	SND1260
					3/17/92	MISSION VALLEY 2	32-46-30	117- 8-22		18	SND2006
			WNUR-959	9210613371	12/07/92	CASSIDY STREET	33-45-17	117-21-48			SND2054A
					3/04/93	CHULA VISTA	32-37-10	117- 1-15		18	SND2087
			WNXM-934	9302618417	3/02/93	TORREY PINES	32-54-43	117-14-21		18	SND2011
			WNYI-748	9111564161	9/01/92	SHARP HOSPITAL	32-47-57	117- 9-12		18	SND2012
						LA MESA	32-46-27	117- 1-22		18	SND2013
						MT. WHITNEY	33- 7-20	117-11-25		18	SND2014
						RANCHO BERNARDO	33- 1- 1	117- 4-42		18	SND2016
			WPAN-708	9207595004	12/03/92	EL CENTRO	32-48-10	115-29-53			SND2061
			WPDH-828	9308630088	11/09/93	SAN YSIDRO	32-32-34	117- 2- 9		18	SND2159
	San Francisco	7,27,35,89	WNUR-953	9210613362	4/01/93	KAISER O' FARRELL ST.	37-46-59	122-26-26		7	SFO2201
			WNXU-266	9109557140	7/14/92	SUTTER BUTTES	39-12-21	121-49-11			SFO2040
						SAN BRUNO #1	37-41-15	122-26- 1		7	SFO2041
						MT. BARHAM	38-30-31	122-39-41			SFO2042
						MT. TORO	36-31-46	121-36-24			SFO2043
						PINE HILL	38-43-10	120-59-22		35	SFO2044
						MT. BULLION	37-32-20	120- 3-54			SFO2045
			WNYQ-319	9207594208	7/28/92	KAISER HOSPITAL	37-46-42	122-27-45		7	SFO2136
						UCSF MEDICAL CENTER	37-45-47	122-27-23		7	SFO2138
						BLOSSOM HILL	37-14- 0	121-46-48		27	SFO2157
			WNYS-481	9207594260	7/28/92	1550 SUTTER ST	37-47-12	122-25-30		7	SFO2119
						MT. TAMALPAIS	37-55-44	122-35-11		7	SFO2120
						MT. VACA 2	38-23-31	122- 5-45			SFO2121A
						SACRAMENTO	38-34-29	121-29-26		35	SFO2122
			WNYS-482	9306627508	9/17/93	AUBURN	38-54-25	121- 5-13		35	SFO2124
						FRENCH CAMP	37-54-54	121-17- 7			SFO2125
						MODESTO	37-38-50	121- 0-33			SFO2126
						MT. OSO	37-30-27	121-22-23		27	SFO2127
			WNYS-483	9308630277	10/06/93	BEAR MOUNTAIN	38- 7- 8	120-43-23			SFO2103
						COHASSET PEAK	39-57-30	121-42-48			SFO2106
					12/03/93	MT. VEEDER	38-22-23	122-27-44			SFO2107A
			WNYS-484	9306627669	9/15/93	MT. DIABLO	37-52-54	121-55- 5		7	SFO2114
						ROUND TOP	37-51- 2	122-11-30		7	SFO2115
						SUNOL RIDGE	37-37-12	121-55-17		7	SFO2116
						SAN JOSE	37-19- 3	121-56-47		27	SFO2117A
						REDWOOD CITY	37-27-25	122-16-15		7	SFO2118
			WNYS-485	9305624472	10/12/93	SAMPSON MTN.	36-45-53	119- 5-46			SFO2109
						ROCKY HILL	36-17-10	119- 5-16			SFO2112
						ALDER SPRINGS #2	37- 4-11	119-25-36		69	SFO2113
			WNYS-486	9201570422	8/10/92	JOAQUIN RIDGE	36-16-14	120-24- 7			SFO2102
			WNYX-760	9201570101	7/14/92	SECURITY BANK	36-44- 5	119-47-23		69	SFO2128

PacTel Paging
Naber Nationwide Exclusivity Request

Exhibit A

Page 4

12/22/93

Frequency : 929.9375 Mhz

State	Main City	Top 100 Markets Call Sign	FCC File # or Naber Cntrl #	Status Date	Site Name	Latitude	Longitude	Base Desig.	Mark. #	PacTel Site ID
		Type: AUTH		Status: LIC						
CA	San Francisco	7,27,35,89 WNYX-760	9201570101	7/14/92	LOMA PRIETA	37- 6-39	121-50-31		27	SFO2129
					MORGAN HILL	37- 7-26	121-38-31		27	SFO2130
					EMPIRE GRADE 2	37- 6- 2	122- 8-24		27	SFO2131
		WNZA-206	9305624477	9/14/93	ST. HELENA	38-40-10	122-37-50			SFO2132
					BIG ROCK	38- 3-33	122-36-10		7	SFO2133
					HEDGE ROAD	38-31-47	121-21-29		35	SFO2134
		WPAD-766	9210613868	12/18/92	S F GENERAL HOSPITAL	37-45-17	122-24-15		7	SFO2199
		WPAD-786	9207594845	10/14/92	WOLF PEAK 2	39- 7-59	121- 5-57			SFO2156
CO	Denver	19,100 WPCJ-895	9304621805	9/23/93	DENVERS	39-44-56	104-59-15		19	NWE1003
					ENGLEWOOD	39-34-26	104-50-48		19	NWE1005
				10/07/93	COLORADO SPRINGS	38-44-46	104-51-37		100	NWE1002
				10/27/93	EL DORADO MOUNTAIN	39-54-48	105-17-32		19	NWE1006
				11/05/93	LOUISVILLE	39-58- 8	105- 9-41		19	NWE1004
		WPDR-595	9308631524	11/12/93	ASPEN MTN.	39- 9-13	106-49-14			NWE1042
CT	State of CT	32,42 NEW-63	9304622349	12/03/93	WEST HAVEN	41-16- 9	72-58-27		42	NEA1158
					OLD SAYBROOK	41-18-24	72-22-47		32	NEA1159
					STAFFORDVILLE	42- 1-19	72-12-30		32	NEA1160
					DANBURY	41-23-45	73-25-33		42	NEA1161
					BRIDGEPORT	41-10-52	73-11-28		42	NEA1162
		WPAN-702	9208605410	9/14/92	HARTFORD (WOODLAN D)	41-46-11	72-42- 6		32	NEA1026
					HAMDEN (WESTROCK)	41-20-58	72-58-27		32	NEA1027
					TOLLAND	41-51-39	72-24-15		32	NEA1028
					WINDSOR LOCKS	41-55-52	72-41-10		32	NEA1029
		WPAT-317	9209609964	10/19/92	STAMFORD	41- 3-54	73-32- 4		42	NEA1021
		WPBN-976	9212616423	5/01/93	NEW HAVEN (HOWARD)	41-18-16	72-56- 7		42	NEA1072
					WATERBURY	41-34-14	73- 1- 0		32	NEA1073
				8/06/93	AVON	41-48-10	72-48- 4		32	NEA1091
		WPC-245	9302619419	4/27/93	COLCHESTER	41-31-53	72-21-30		32	NEA1129
					EAST KILLINGLY	41-52-15	71-49-15			NEA1130
		WPCP-294	9304622345	6/28/93	MILFORD	41-13- 0	73- 4- 7		42	NEA1163
					FARMINGTON	41-42-13	72-49-57		32	NEA1166
				7/21/93	STORRS	41-48-49	72-15-34		32	NEA1165
		WPCZ-682	9305624497	8/20/93	NORWICH	41-32- 7	72- 4-35		32	NEA1238
		WPCZ-702	9305624901	8/23/93	WILTON	41-14-30	73-28-15		42	NEA1239
		WPCZ-766	9304622347	8/25/93	HARTFORD (BUSHNEL L)	41-45-50	72-40-31		32	NEA1189
					SEYMOUR	41-21-30	73- 7-29		42	NEA1190
					GREENWICH	41- 1-19	73-38-26		42	NEA1191
					GLASTONBURY	41-42-32	73-28-30			NEA1192

PacTel Paging
Naber Nationwide Exclusivity Request

Exhibit A
Page 5

12/22/93

Frequency : 929.9375 Mhz

State	Main City	Top 100 Markets	Call Sign	FCC File # or Naber Cntrl #	Status Date	Site Name	Latitude	Longitude	Base Desig.	Mark. #	PacTel Site ID
Type: AUTH		Status: LIC									
CT	State of CT	32,42	WPCZ-766	9304622347	8/25/93	NEW MILFORD	41-36-18	73-22- 4		32	NEA1193
			WPCZ-768	9304622346	8/25/93	NORTH STONINGTON	41-27- 3	71-55-42			NEA1167
						TORRINGTON	41-48- 8	73- 9-50		32	NEA1168
						NORWALK	41- 6-54	73-26- 6		42	NEA1171
						NEW LONDON #2	41-21-34	72- 6-12			NEA1172
			WPDB-926	9307628499	9/16/93	KILLINGWORTH	41-21-23	72-31-11		42	NEA1248
			WPDB-927	9307628500	9/16/93	MERIDEN (GILLMORE)	41-33-42	72-50-41		32	NEA1251
DE	State of DE	65	WPDH-494	9308630344	11/10/93	WILMINGTON (ROLLINS)	39-47-22	75-32-55		65	NEA1277
FL	Fort Meyers		WPCT-696	9305623898	8/05/93	DURRANCE	26-43-35	81-47-12			TSP2059
					11/05/93	NAPLES2	26- 7-34	81-43-18			TSP2061
			WPDJ-453	9308630597	11/05/93	BONITA SPRINGS	26-19- 0	81-47-13			TSP2074
	Jacksonville	50	WNYI-778	9301617216	7/27/93	INDEPENDENT PLAZA	30-19-33	81-39-32		50	NFL2051
					7/28/93	UNIVERSITY CENTRE	29-38-20	82-20-34			NFL2073
					9/13/93	WOODVILLE HWY	30-23-12	84-16-32			NFL2052
	Miami	12,67	WNYL-916	9210613403	4/01/93	CONGRESS AVE.	26-25-54	80- 5-38		67	MIA2026
					5/01/93	PALM BEACH	26-43-58	80- 4-50		67	MIA2011
						HOLLYWOOD	25-59-34	80-10-27		12	MIA2012
						SOUTH OCEAN BLVD.	26-12-46	80- 5-37		12	MIA2025
			WNYQ-330	9302618447	5/01/93	DOMINION TOWER	25-47-16	80-12-41		12	MIA2027
						HIALEAH	25-50-52	80-17-30		12	MIA2028A
						POINTS OF AMERICA	26- 5-46	80- 6-25		12	MIA2038
			WPDB-881	9304623013	9/13/93	HOMESTEAD #1	25-28-26	80-28-17		12	MIA2044
						JUPITER 2	26-56-10	80- 4-12		67	MIA2048
						DATRAN 1	25-41- 5	80-18-52		12	MIA2052
						KEY WEST	24-34-17	81-44-20			MIA2053
	Orlando	57	WNYL-918	9210613076	7/30/93	LAKE BUENA VISTA	28-22-35	81-30-52		57	NFL2059
					8/14/93	DIRECTORS ROW	28-27-23	81-24-13		57	NFL2060
						CARDER ROAD	28-36-19	81-25- 7		57	ORL2004
					8/20/93	MELBOURNE #2	28- 2-54	80-40-34			ORL2005
					8/24/93	PINEDA STREET	28-41-11	81-20-59		57	NFL2063
			WPCP-939	9304623012	8/20/93	BONAVENTURE	28-16-42	80-42- 3			NFL2092
			WPCP-941	9304623017	8/14/93	KISSIMMEE	28-16-45	81-20-35		57	NFL2104
					8/18/93	TITUSVILLE	28-35- 3	80-50-56		57	NFL2102
					8/21/93	HOLLY HILL	29-14-14	81- 3-32			NFL2106
	Pensacola		WPCQ-231	9304622778	12/03/93	PENSACOLA	30-30- 7	87-16-50			NFL2089
	Tampa	22	WNXM-932	9301616828	2/01/93	PINELLAS PARK	27-49-51	82-41-57		22	TSP2050
						USF	28- 4- 4	82-24-56		22	TSP2056
			WPCP-940	9304623014	7/26/93	SARASOTA	27-20-12	82-32-17		22	TSP2065

PacTel Paging
Naber Nationwide Exclusivity Request

12/22/93

Frequency : 929.9375 Mhz

State	Main City	Top 100 Markets	Call Sign	FCC File # or Naber Cntrl #	Status Date	Site Name	Latitude	Longitude	Base Desig.	Mark. #	PacTel Site ID

Type : AUTH		Status: LIC									

FL	Tampa	22	WPCP-940	9304623014	7/26/93	BRADENTON	27-27-49	82-35-32		22	TSP2069
					11/05/93	LAKE HIGHLAND RD.	27-56-37	81-55-18		22	TSP2067
GA	Atlanta	17	WNYS-471	9112565309	8/25/92	CANTON	34-14-19	84-26-35		17	ATL2047
					8/26/92	DOUGLASVILLE	33-45- 4	84-45-55		17	ATL2045
					8/27/92	MCDONOUGH	33-25-31	84-11-20		17	ATL2046
					9/01/92	SNELLVILLE	33-50-58	84- 2-11		17	ATL2042
					9/17/92	GAINESVILLE2	34-17-56	83-49-22			ATL2044
					9/30/92	ATHENS #2	33-57- 9	83-24-31			ATL2043
			WNZI-930	9209609995	10/19/92	CONYERS	33-38-58	83-58-49		17	ATL2066
					12/02/92	FAYETTEVILLE	33-27- 9	84-30-42		17	ATL2070
						CLARKSTON	33-50- 9	84-15- 5		17	ATL2114
					12/07/92	PINE MTN.	33-59-22	84-38-39		17	ATL2068
						SWEAT MTN.	34- 4- 0	84-27-21		17	ATL2069
			WNZP-837	9209610233	12/02/92	ST. JOSEPH HOSPITAL	33-54-31	84-20-58		17	ATL2062A
						DULUTH	34- 0- 5	84- 9- 2		17	ATL2065A
					12/07/92	FIRST NAT. BANK	33-45-16	84-23-25		17	ATL2060A
						MABLETON	33-47-45	84-34-23		17	ATL2063A
						JONESBORO	33-33-21	84-18- 0		17	ATL2064A
			WPBJ-863	9302618896	3/30/93	NEWNAN	33-23-49	84-49-36		17	ATL2102
			WPCR-477	9309631888	11/23/93	CARROLTON 2	33-38-13	85- 2-15			ATL2195A
					7/21/94	BRUNSWICK	31-12- 0	81-29-48			ATL2196A
						EAST POINT	33-41-40	84-25- 2		17	ATL2197A
			WPDG-741	9305624048	9/27/93	ALPHARETTA	34- 3-20	84-18-22		17	ATL2201
						UNION CITY	33-35-58	84-33-17		17	ATL2209
	State of GA	96	WNYI-807	9209608007	9/29/92	AUGUSTA 2	33-26-15	82- 5-27		96	ATL2034A
						COLUMBUS 2	32-28-49	84-58-55			ATL2036B
						MACON 2	32-50-43	83-40-28			ATL2037A
						VIDALIA 2	32-14- 2	82-28-52			ATL2038A
					12/02/92	ROME	34-14-19	85-13-20			ATL2035
						SAVANNAH	32- 2-55	81- 6-14			ATL2039
			WNYI-814	9302619756	5/01/93	LEESBURG	31-41-15	84-10- 0			ATL2040
						VALDOSTA	30-49-47	83-18-41			ATL2041A
						PANTHERSVILLE	33-42-37	84-16- 2			ATL2171
					10/13/93	THOMASVILLE	30-51-43	83-56- 6			ATL2170
			WPDS-632	9309633796	11/29/93	STONE MTN.	33-48-19	84- 8-44			ATL2249
IA	Ceddar Rapids		WPCY-861	9305624156	8/19/93	CEDAR RAPIDS	41-57- 9	91-41- 0			MWE2025
	Davenport	90	WPCY-861	9305624156	8/19/93	RETTENDORF	41-36-13	90-26- 1		90	MWE2024
	Des Moines	92	WPCY-860	9305624155	8/19/93	DES MOINES	41-38-95	93-34-46		92	MWE2022
ID	Boise		WPCJ-896	9304621806	6/16/93	BOISE	43-35-54	116- 8-44			NWE1007
IL	Chicago	3,21,99	WPAY-215	9209610672	3/11/93	WOODSTOCK	42-19- 0	88-27-59			MWE1000
						ROSEMONT	42- 0-12	87-53-48		3	MWE1001
						HAMMOND	41-36-55	87-31-23		3	MWE1002

PacTel Paging
Naber Nationwide Exclusivity Request

12/22/93

Frequency : 929.9375 Mhz

State	Main City	Top 100 Markets	Call Sign	FCC File # or Naber Cntrl #	Status Date	Site Name	Latitude	Longitude	Base Desig.	Mark. #	PacTel Site ID
		Type : AUTH		Status: LIC							
IL	Chicago	3,21,99	WPAY-215	9209610672	3/11/93	CHICAGO RIDGE	41-42-31	87-47- 2		3	MWE1003
					8/02/93	SCHAUMBURG	42- 2-39	88- 2-36		3	MWE1004
			WPBG-854	9210613072	8/02/93	CHICAGO (1ST NAT.)	41-52-53	87-37-48		3	MWE1011
						AURORA	41-48-26	88-16- 7		3	MWE1012
						TINLEY PARK	41-33-10	87-47- 9		3	MWE1013
						JOLIET	41-29-58	88- 7-26		3	MWE1015
						BOLLINGBROOK	41-42- 1	88- 0-26		3	MWE1016
			WPBM-947	9211614768	8/02/93	CHICAGO (SHERIDAN)	41-58-49	87-39-15		3	MWE1029
						LOMBARD	41-50- 9	88- 0-28		3	MWE1031
			WPBM-964	9212615701	8/02/93	VALPARAISO	41-31-28	87- 1- 8			MWE1063
			WPBW-253	9212615702	8/02/93	FRANKSVILLE	42-45-36	87-57-53		21	MWE1069
					11/12/93	MADISON	43- 4-30	89-22-52		99	MWE1067
						MILWAUKEE	43- 2-19	87-55-11		21	MWE1071
			WPBY-858	9302619102	3/31/93	JANESVILLE 1	42-41-47	88-56-59		99	MWE1105
			WPCB-218	9302619378	8/02/93	LA PORTE 1	41-40- 7	86-48-21			MWE1104
						SOUTH BEND	41-40-35	86-15- 8			MWE1106
			WPCR-419	9309631960	10/28/93	NORMAL	40-28-46	89- 3-12			MWE2079
						DECATUR	39-51-45	88-58-11			MWE2080
			WPCR-435	9309631951	10/28/93	SYCAMORE	41-57-47	88-43- 6			MWE2074
						BELVIDERE	42-13- 6	88-49-16			MWE2077
			WPDG-718	9307629300	9/23/93	ELGIN	42- 1-16	88-23- 8			MWE1017A
						NORTHBROOK	42- 8-10	87-48-45		3	MWE1019A
						ROCKFORD	42-16- 2	89- 4-12			MWE1020A
						LAKE ZURICH	42-14-12	88- 4-17		3	MWE1021A
						GURNEE	42-19-42	87-54-48		3	MWE1022A
	Quincy		WPCY-862	9305624157	8/19/93	ONE QUINTRON WAY	39-57-40	91-22-51			MWE2027
	Spring Field	93	WPCY-858	9305624151	8/19/93	EFFINGHAM	39-10-35	88-31-34			MWE2016
						EAST PEORIA	40-37-10	89-34-20		93	MWE2018
						SPRINGFIELD (IL)	39-46-54	89-34-30			MWE2019
						SPRINGFIELD #3	39-46- 1	89-34-20			MWE2020
IN	Ft Wayne	88	WPCQ-966	9304623234	7/12/93	FT. WAYNE	41- 6-18	85-11-44		88	MWE1171
KS	Kansas City	24	WPCY-856	9305624149	8/19/93	KANSAS CITY (ONE KC)	39- 5-58	94-34-57		24	MWE2008
			WPCY-895	9305624432N	8/20/93	KANSAS CITY (TIFFANY)	39-15-24	94-39-36		24	MWE2002
	Wichita	82	WPCQ-946	9304623127	7/09/93	WICHITA	37-41-13	97-20-21		82	MWE1192
KY	Louisville	37,28	WPCP-319	9304622670	6/29/93	LEXINGTON	38- 0-54	84-26-18			MWE1162
			WPCQ-964	9304623232	7/12/93	AUL BUILDING	39-46-14	86- 9-30		28	OHI2067
			WPDG-751	9305624158	9/18/93	EVANSVILLES	37-58-20	87-34-13			MWE2028
			WPKD-391	9308630662	10/08/93	LOUISVILLE	38-14-38	85-45-34		37	MWE1202
LA	Alexander		WPCS-819	9304622769	7/15/93	ALEXANDRIA	31-14-11	92-27-34			DFW5020
	Baton Rouge	74	WNYI-812	9211614286	9/30/93	1 AMERICAN PLACE	30-27- 6	91-11-16		74	DFW2131