

the Commission's administrative burdens and facilitate information retrieval by the general public.

F. APC opposes the proposal of the Utilities Telecommunications Council (UTC) to adopt cellular licensing procedures for PCS applicants. As noted by APC in its November 24, 1993 Reply Comments in the auction rule making (PP Docket 93-253), imposing cellular filing requirements upon PCS applicants would be inappropriate and/or in direct conflict with the Part 99 rules already adopted.

G. APC supports the changes to Section 99.234(a) proposed by Telocator. Specifically, these changes will apply PCS emission limitations within the PCS band and specify the resolution bandwidth used in determining compliance with them.

H. APC supports Telocator's proposal to conform the language of Section 99.52 to the discussion in the Second Report and Order.

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APC continues to regret the Commission's decision not to allocate at least a portion of the 38 GHz band specifically for PCS backhaul. As we feared, because of the Commission's failure in this regard, recent applications propose to consume all of the remaining 38 GHz channels in the Washington/Baltimore and other substantial markets.

Case-by-case adjudication of competing applications in the 38 GHz band in self-defined rectangular service areas is an inefficient, ineffective and delay-prone approach to the problem of congestion on these frequencies. APC urges the Commission to reconsider and adopt a partial set-aside of the 38 GHz frequencies for PCS backhaul.

Respectfully submitted,

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