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April 29, 1994



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 THE SECRETARY

CTIA

Cellular
Telecommunications
Industry Association
1250 Connecticut
Avenue, N.W.
Suite 200
Washington, D.C. 20036
202-785-0081 Telephone
202-785-0721 Fax

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Mr. Caton:

On Friday, April 29, 1994, the Cellular Telecommunications Industry Association ("CTIA") sent the attached letter, and PCS White Paper Number 4, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, to the FCC staff listed below.

Daniel Abeyta
Judith Argentieri
Rudy Baca
Beverly Baker
Andrew Barrett
Thomas Beers
Lauren Belvin
James Bennett
Nancy Boocker
Karen Brinkmann
Kelly Cameron
John Cimko
Rodney Small
Jonathan Cohen
Barbara S. Esbin
Brian Fontes
Bruce Franca
David Furth
Donald Gips
Bart Gorman
Sheldon Guttman
Ralph Haller
Reed Hundt
Stevenson Kaminer
Michael Katz
Bill Kennard
Kimberly King
Julia Kogan

Evan Kwerel
Blair Levin
Kathy Levitz
Renee Licht
Byron Marchant
Steve Markendorff
Roland Martin
Geraldine Matise
Maura McGowan
Ruth Milkman
Tom Mooring
Kent Nakamura
David Nall
Myron Peck
Dr. Robert Pepper
James Quello
David Reed
Jill Ross-Meltzer
Greg Rosston
Sarah Siedman
David Siddall
Richard Smith
David Solomon
Thomas Spavins
Merrill Spiegel
Dr. Tom Stanley
Gerald Vaughan
Gregory J. Vogt

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001

Mr. Caton
April 29, 1994
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If there are any questions in this regard, please contact the undersigned.

Sincerely,



Robert F. Roche

Enclosure



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Randall S. Coleman
Vice President for
Regulatory Policy and Law

April 29, 1994

Chairman Reed Hundt
Federal Communications Commission
1919 M Street, N.W. Room 814
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Chairman Hundt:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

Cellular eligibility in- and out-of-market is the right policy to create a vital and viable PCS industry, because:

- **Cellular carriers are uniquely qualified to provide PCS, given their experience in deploying innovative wireless services nationwide. (see p.2)**
- **Excluding or unnecessarily restricting cellular carriers and investors will harm the public by delaying the deployment of PCS and eliminating production efficiencies. (see p.3)**
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- **Cellular eligibility will foster innovation and competition by exploiting the experience and the facilities of cellular companies and investors. (see p.5)**
- **Elimination of unnecessary and unreasonable ownership attribution and geographic overlap rules is called for to ensure the national information infrastructure is funded and deployed throughout the country, delivering advanced wireless services to rural and urban areas. (see p.7)**

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Page 2



The public will benefit from such companies' knowledge and the efficiencies of their networks, and the FCC will foster innovation and competition in wireless services.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "R. S. Coleman".

Randall S. Coleman

Enclosure



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Randall S. Coleman
Vice President for
Regulatory Policy and Law

April 29, 1994

Mr. Rudolfo Baca
Legal Advisor to Commissioner Quello
Federal Communications Commission
1919 M Street, N.W. Room 802
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Mr. Baca:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

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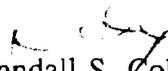
April 29, 1994
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Very truly yours,


Randall S. Coleman

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Randall S. Coleman
Vice President for
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April 29, 1994

Mr. Byron Marchant
Senior Legal Advisor to Commissioner Barrett
Federal Communications Commission
1919 M Street, N.W. Room 826
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Mr. Marchant:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

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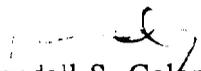
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Randall S. Coleman
Vice President for
Regulatory Policy and Law

April 29, 1994

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. 90-314
Personal Communications Services

Dear Commissioner Quello:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

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Randall S. Coleman

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Randall S. Coleman
Vice President for
Regulatory Policy and Law

April 29, 1994

Mr. Gerald P. Vaughn
Deputy Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W. - Room 500
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Mr. Vaughn:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

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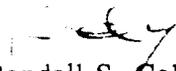
April 29, 1994
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Very truly yours,


Randall S. Coleman

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April 29, 1994

Ms. Karen Brinkmann
Office of the Chairman
Federal Communications Commission
1919 M Street, N.W. Room 814
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Ms. Brinkmann:

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Randall S. Coleman
Vice President for
Regulatory Policy and Law

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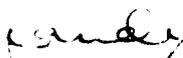
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Very truly yours,


Randall S. Coleman

Enclosure



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April 29, 1994

Ms. Julia Kogan
Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W. - Room 5202
Washington, D.C. 20554

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Ms. Kogan:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

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April 29, 1994
Page 2



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Very truly yours,

Randall S. Coleman

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April 29, 1994

Mr. Gregory Rosston
Telecommunications Specialist
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. 90-314
Personal Communications Services

Dear Mr. Rosston:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

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Randall S. Coleman
Vice President for
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April 29, 1994
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Vice President for
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Mr. Donald Gips
Deputy 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. 90-314
Personal Communications Services

Dear Mr. Gips:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

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April 29, 1994
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Randall S. Coleman
Vice President for
Regulatory Policy and Law

Mr. Michael Katz
Chief Economist, 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. 90-314
Personal Communications Services

Dear Mr. Katz:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

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Vice President for
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April 29, 1994

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. 90-314
Personal Communications Services

Tom
Dear Dr. Stanley:

The enclosed White Paper, entitled *Growth of a Sustainable PCS Industry: The Critical Role of Cellular Eligibility*, reviews the impact of the Federal Communications Commission's Personal Communications Services (PCS) rules, and concludes that:

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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. 90-314
Personal Communications Services

Dear Dr. Pepper:

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