

FCC Employee Contacted	American Personal Communications	Omnipoint Corporation	Cox Enterprises	PCS Action (Pedesta Associates)
Greg Reesten - Telecommunications Analyst - Office of Plans & Policy		3/17/94		3/14/94 3/23/94
Phillip Inglis - Office of Engineering & Technology		3/10/93 8/19/93		
Nam Phom - Office of Engineering & Technology		3/10/93 7/29/93		
Tony Serofini - Office of Engineering & Technology		3/10/93 7/29/93		
Roland K. Martin - Office of Managing Director	7/8/93 9/13/93 (W)			
Maure McGowan - Office of Engineering & Technology	9/15/93 (2)			
Richard Welsh - Office of International Communications	9/2/93			
Kathryn Dole - Office of General Counsel	6/15/93			
Diane Cornell - Common Carrier Bureau	2/17/94			
Jackie Chernoy Mass Media Bureau	9/2/93			
James Talens - Common Carrier Bureau		6/22/92		

Note:

"(W)" denotes a written Submission to the FCC employee.
 "(#)" denotes the number of contacts by that party on that day.

FCC Employee Contacted	American Personal Communications	Omnipoint Corporation	Cox Enterprises	PCS Action (Pedesta Associates)
Kathleen Q. Abernathy - Office of General Counsel			5/20/93	
Julia Kagan - Private Radio Bureau				3/23/94
Thomas Mooring - Office of Engineering & Technology	7/2/92 (W)			

Note:

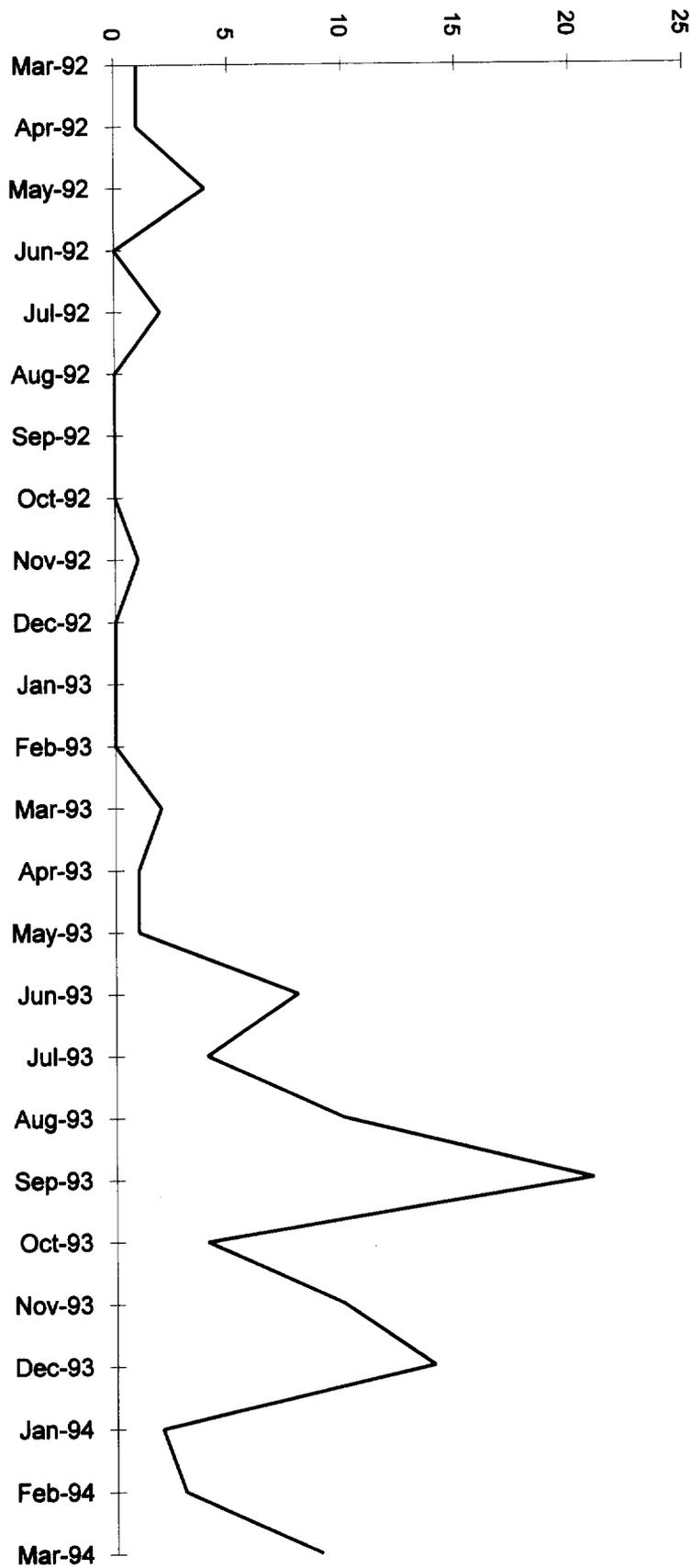
"(W)" denotes a written Submission to the FCC employee.

"(N)" denotes the number of contacts by that party on that day.

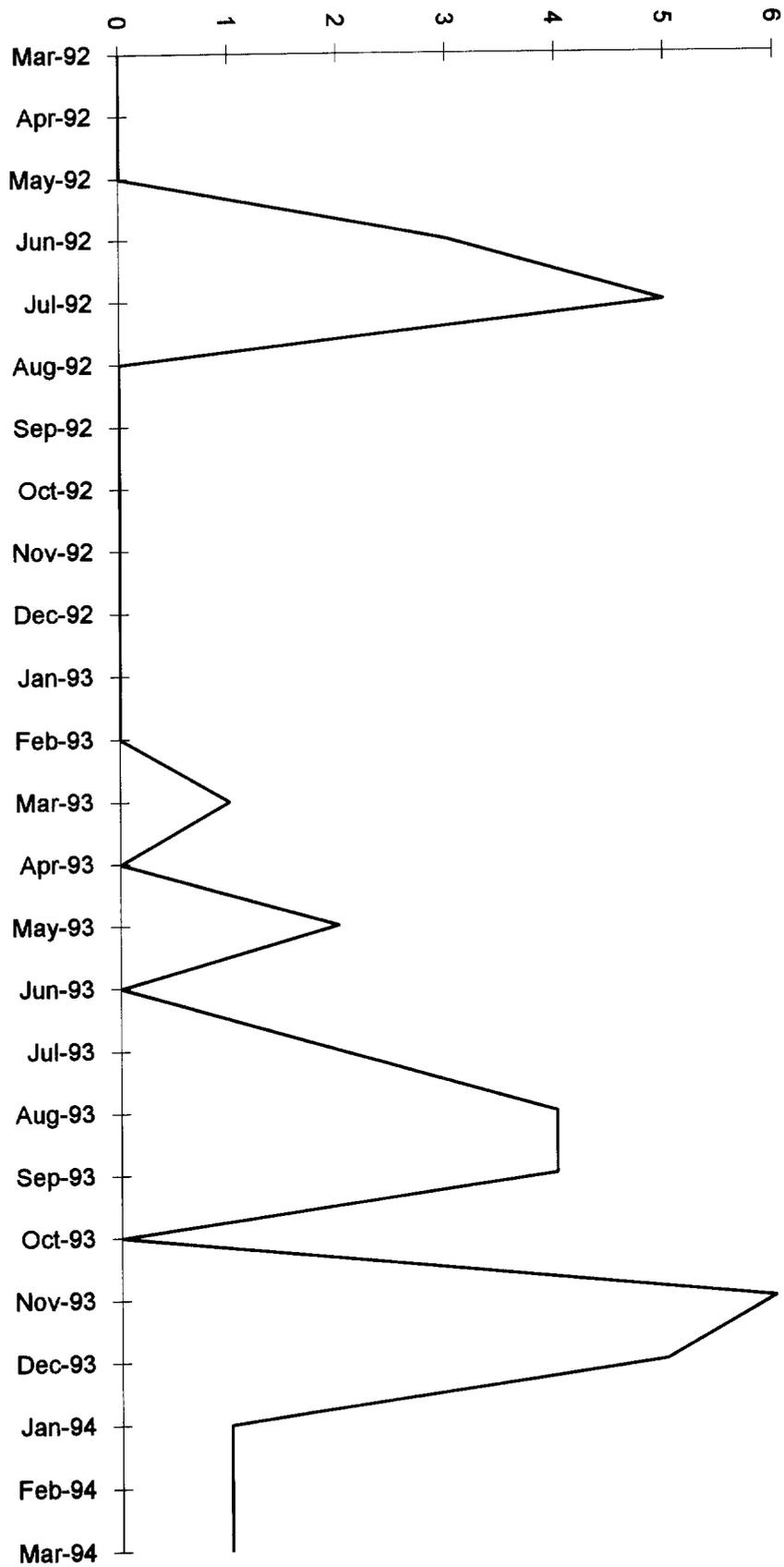
ATTACHMENT B

The first four of the following graphs depict the number of *ex parte* contacts made by APC, Omnipoint, Cox and Action on a monthly basis from March, 1992 through March, 1994. The fifth graph depicts in a single, consolidated graph on a uniform scale the information shown on the first four graphs; it also includes a depiction of the total of *all ex parte* contacts by all four parties (*i.e.*, APC, Omnipoint, Cox and Action) on a monthly basis during the period in question.

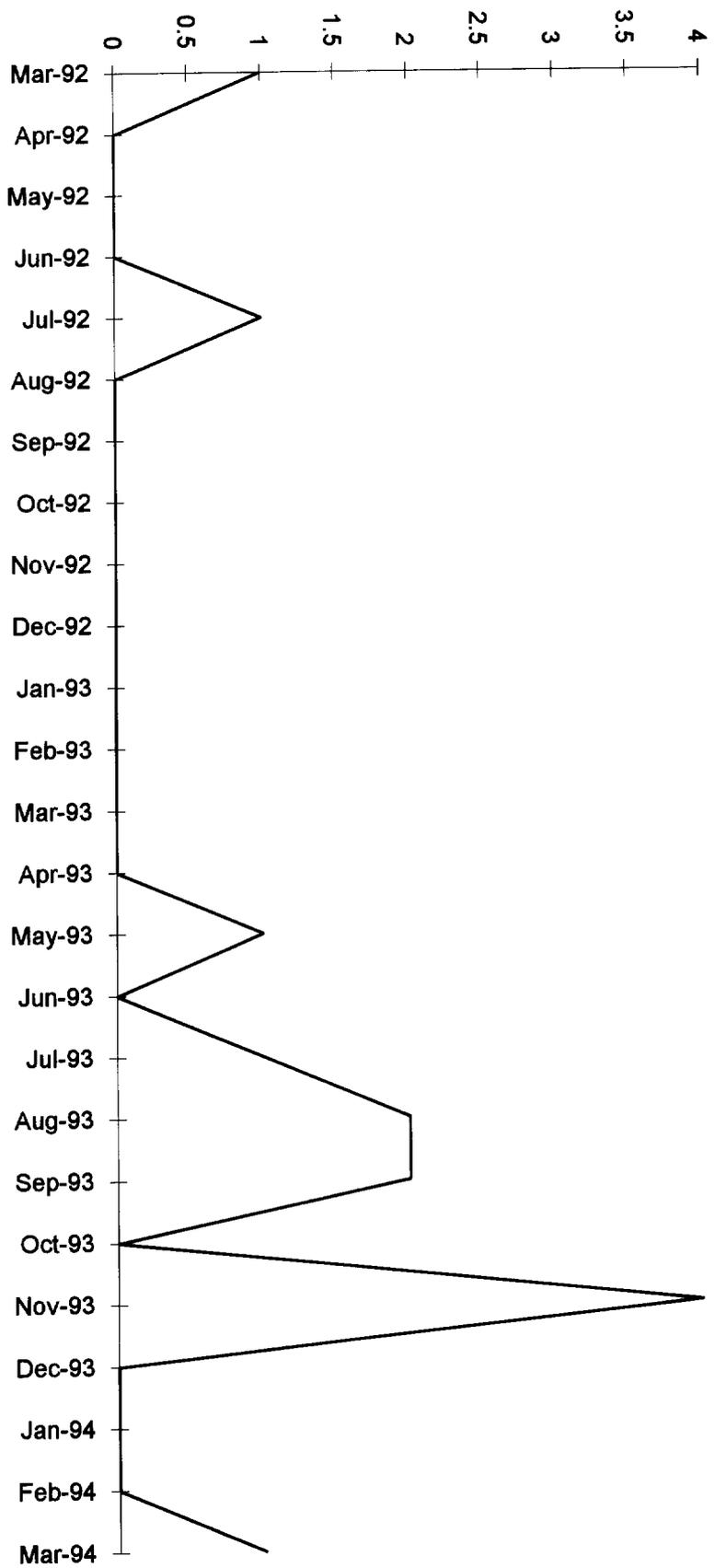
Finally, the table following the fifth graph contains the raw data from which the information on the various graphs was derived. That information was obtained from the *ex parte* letters submitted by the respective parties. It reflects the numbers of instances in which each of the parties engaged in *ex parte* conduct. Note that it does not necessarily reflect the number of Commission staffpersons contacted in any particular instance of *ex parte* conduct.



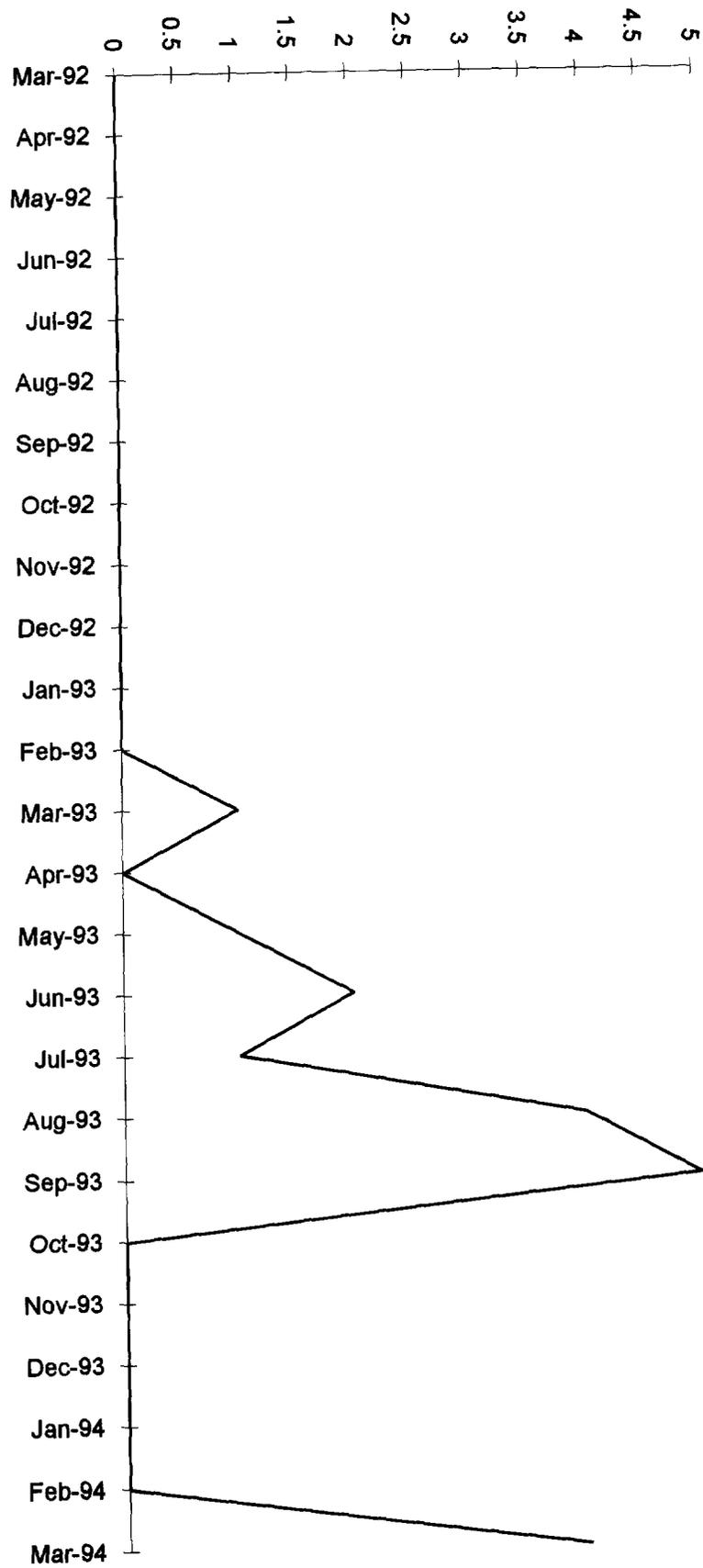
Ex Parte Contacts by APC



Ex Parte Contacts by Omnipoint

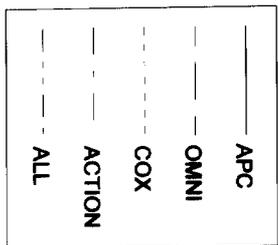
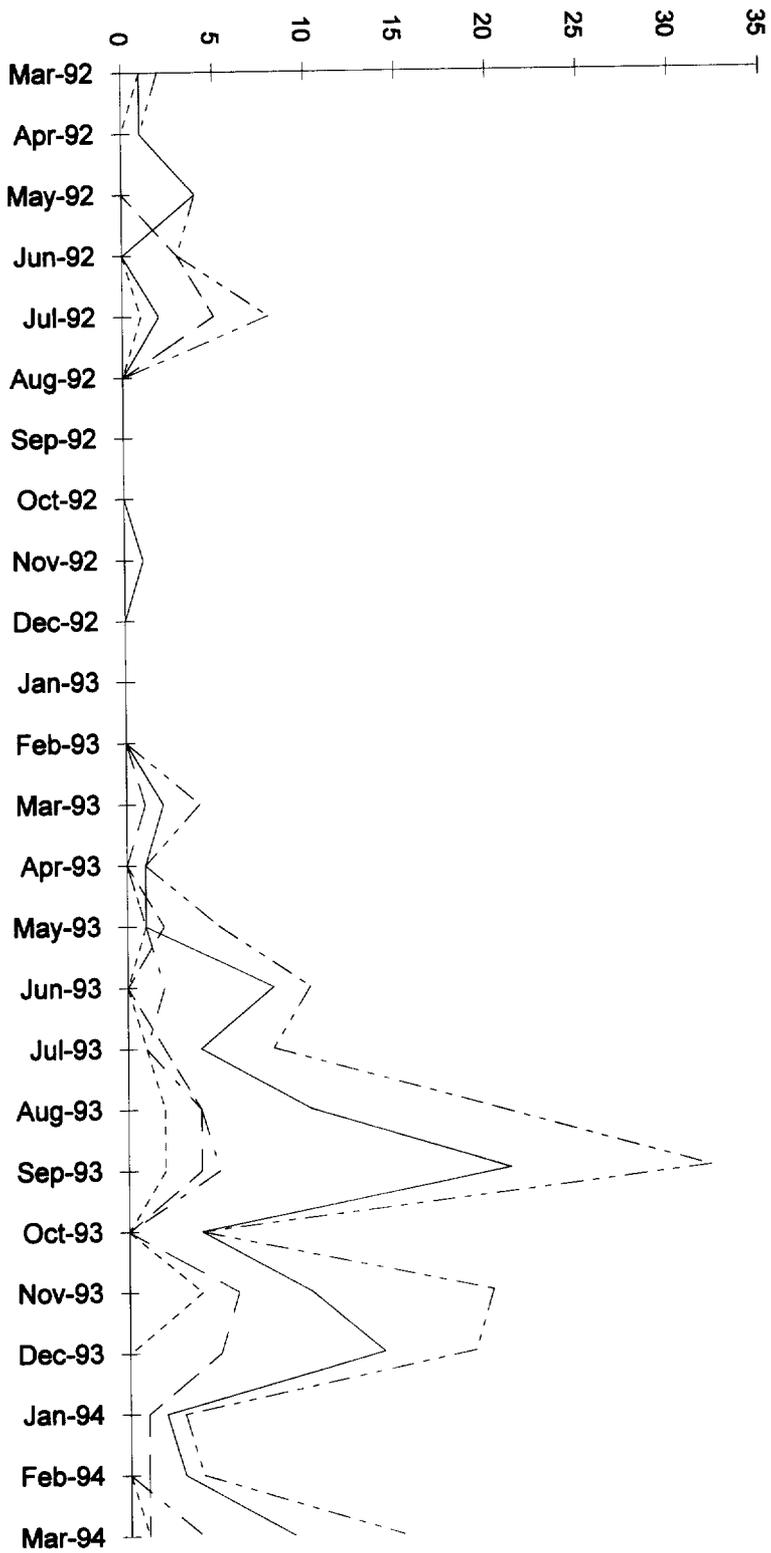


Ex Parte Contacts by Cox



Ex Parte Contacts by Action

Ex Parte Contacts by APC, Omnipoint, Cox and Action



Month	APC		OMNIPOINT		COX		ACTION		TOTAL CONTACTS PER MONTH
	Total	Dates	Total	Dates	Total	Dates	Total	Dates	
3/92	1	3/9/92			1	3/17/92			2
4/92	1	4/9/92							1
5/92	4	5/27/92 (3) 5/28/92							4
6/92			1	6/22/92					3
7/92	2	7/2/92 (2)	5	7/7/92 (5)	1	7/8/92			8
8/92									0
9/92									0
10/92									0
11/92	1	11/4/92							1
12/92									0
1/93									0
2/93									0
3/93	2	3/24/93 3/25/93	1	3/2/93			1	3/10/93	4
4/93	1	4/23/93							1
5/93	1	5/21/93	2	5/10/93 5/11/93	1	5/20/93	1	5/25/93	5
6/93	8	6/11/93 6/17/93 (4) 6/23/93 6/25/93 (2)					2	6/11/93 6/29/93	10
7/93	4	7/1/93 7/7/93 7/8/93 7/21/93	2	7/27/93 7/29/93	1	7/28/93	1	7/28/93	8
8/93	10	8/6/93 8/9/93 8/12/93 8/17/93 8/19/93 (2) 8/25/93 8/31/93 (3)	4	8/2/93 8/17/93 8/24/93 8/30/93	2	8/18/93 (2)	4	8/9/93 8/10/93 8/11/93 8/12/93	20

Month	APC		OMNIPOINT		COX		ACTION		TOTAL CONTACTS PER MONTH
	Total	Dates	Total	Dates	Total	Dates	Total	Dates	
9/93	21	9/3/93 9/7/93 (3) 9/9/93 9/13/93 9/14/93 (3) 9/15/93 (5) 9/15/93 (5) 9/27/93 9/29/93	4	9/14/93 9/15/93 9/29/93 (2)	2	9/2/93 9/28/93	5	9/8/93 9/9/93 9/13/93 9/14/93 9/15/93	32
10/93	4	10/4/93 10/25/93 10/28/93 10/29/93							4
11/93	10	11/2/93 (2) 11/8/93 (2) 11/9/93 11/12/93 11/17/93 11/19/93 11/22/93 11/24/93	6	11/1/93 11/2/93 (2) 11/3/93 11/17/93 11/30/93	4	11/3/93 (2) 11/04/93 11/10/93			20
12/93	14	12/1/93 12/3/93 (2) 12/6/93 12/7/93 (2) 12/8/93 (2) 12/9/93 12/10/93 12/16/93 12/17/93 12/20/93 12/22/93	5	12/1/93 (4) 12/3/93					19
1/94	2	1/14/94 1/19/94	1	1/24/94					3
2/94	3	2/18/94 2/24/94 2/25/94	1	2/23/94					4

Month	APC		OMNIPOINT		COX		ACTION		TOTAL CONTACTS PER MONTH
	Total	Dates	Total	Dates	Total	Dates	Total	Dates	
3/94	9	3/2/94 3/8/94 (2) 3/9/94 3/15/94 3/16/94 3/25/94 3/29/94 3/31/94	1	3/17/94	1	3/29/94	4	3/1/94 3/11/93 3/14/94 3/24/94	15

ATTACHMENT C

**Letter, dated May 3, 1994,
to William Kennard, General Counsel,
from John D. Dingell, Chairman,
Subcommittee on Oversight and Investigations**

JOHN D. DINGELL, MICHIGAN, CHAIRMAN

SHERROD BROWN, OHIO
MARJORIE MARGOLIES-MEZVINSKY,
PENNSYLVANIA
HENRY A. WAXMAN, CALIFORNIA
CARDISS COLLINS, ILLINOIS
RON WYDEN, OREGON
JOHN BRYANT, TEXASDAN SCHAEFER, COLORADO
CARLOS J. MOORHEAD, CALIFORNIA
JOE BARTON, TEXAS
FRED UPTON, MICHIGAN

U.S. House of Representatives
Subcommittee on Oversight and Investigations
of the
Committee on Energy and Commerce
Washington, DC 20515-6116

REID P.F. STUNTZ, STAFF DIRECTOR/CHIEF COUNSEL

May 3, 1994

Mr. William Kennard
General Counsel
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Kennard:

Pursuant to Rules X and XI of the Rules of the U.S. House of Representatives, the Subcommittee of Oversight and Investigations of the Committee on Energy and Commerce is investigating the Commission's so-called "Pioneer's Preference" policy, specifically with respect to the Commission's procedures and ultimate decision to award a "Pioneer Preference" to four companies earlier this year.

Four allegations concerning the Commission's decision are of particular interest to the Subcommittee: that the Commission's rules were egregiously and repeatedly violated; that the Commission's own behavior encouraged ex parte contacts and foreclosed opportunities for notice and comment; that the value of the "Pioneer Preference" awarded by the Commission is substantially in excess of the value of the contributions of the so-called "Pioneers"; and that the Commission's procedures were not sufficiently rigorous so as to justify the bestowal of an award as valuable as a "Pioneer Preference".

There may be some benefit to continuing to award "Pioneer Preferences" subsequent to the enactment of legislation authorizing the Commission to use competitive bidding procedures to license spectrum assignments. However, those awards must be based on hard scientific data, and must be granted pursuant to the rigorous enforcement of the Commission's rules so as to protect the consideration of the merits of the applicants from political or lobbying pressure. The Subcommittee is not satisfied that the Commission's consideration and procedures met this test.

Inasmuch as Chairman Hundt is recused from participating in this matter, and one of the participants (Commissioner Duggan) is

Mr. William Kennard
Page 2

no longer a member of the Commission, I am writing to ask that you assist the Subcommittee in its investigation by responding to the following questions:

1. Was the Commission's decision in the matter styled "ET Docket No. 93-266" made at an open meeting? Or was this decision made utilizing the Commission's "circulation" procedures?
2. It is my understanding that the Commission's practice is to release immediately the text of Commission decisions made using the Commission's "circulation" procedures. It is also my understanding that the "circulation" practice involves a series of sequential edits to tentative decisions by the participating Commissioners, and accompanying "pink sheets" to colleagues explaining the reasons for changes.
 - a. When was the text of the Commission's decision in the above-referenced Docket released?
 - b. Please describe the "circulation" process to the Subcommittee in detail.
 - c. In formulating your answer to question 2(a) above, did you have access to the "pink sheets"? Were you able to determine whether significant changes were made after the announcement of the decision on December 23 and prior to the release of the text of the Commission's decision?
 - d. Are you aware of any cases involving other Commission decisions that were made "on circulation" in which the text of the decision was not released for more than 30 days?
3. Are you able to account for the reasons for the delay in the release of this text?
4. During the period between the announcement of a Commission decision and the release of the text of that decision, it is my understanding that the subject proceeding is restricted under the Commission's rules. Are you aware of any contacts by entities designated as "pioneers" during the period beginning when the Commission's decision was announced and ending when the text of that decision was released? In your response, please include any contacts in the above-referenced proceeding and any other proceedings, including filings made with respect to experimental licenses.

5. The Subcommittee is aware of correspondence between several parties to the above-referenced proceeding and the Commission's Managing Director. Several of these letters include allegations which, if true, could constitute serious violations of Commission rules. Among the correspondence to which I refer are the following:

Letter from Michael K. Kellogg to Andrew S. Fishel (January 26, 1994).

Letter from Mark J. Tauber to Andrew S. Fishel (February 1, 1994).

Letter from Werner K. Hartenberger and Laura H. Phillips to Andrew S. Fishel (February 4, 1994).

Letter from Jonathan D. Blake, Kurt A. Wimmer to Andrew S. Fishel (February 4, 1994).

Letter from Michael K. Kellogg to Andrew S. Fishel (February 23, 1994).

Letter from Jonathan D. Blake, Kurt A. Wimmer to Andrew S. Fishel (March 8, 1994).

Letter from Michael K. Kellogg to Andrew S. Fishel (March 16, 1994).

Letter from Jonathan D. Blake, Kurt A. Wimmer to Andrew S. Fishel (March 25, 1994).

Please obtain copies of this and other relevant correspondence and submit to the Subcommittee your analysis of the allegations contained therein. Please supply any documents necessary to support your conclusions.

6. On what date, or dates, did the Commission's "Pioneer Preference" process become a restricted proceeding? Did the Commission issue any announcement or otherwise inform the public as to the date or the nature of the restrictions that would pertain? If so, please provide copies of any such announcements to the Subcommittee.
7. Did the staff that was preparing recommendations to the Commissioners with respect to "Pioneer Preference" designations have substantive contact of any sort with applicants after the date on which the preference proceeding was considered restricted? For example, were any of the staff who participated in making recommendations to the Commission on pioneer preference

entitlements also reviewing reports concerning experimental licenses filed by the applicants after the date the pioneer preference proceeding was considered restricted?

8. Please identify the dates, participants in, and specific subjects of all meetings, conversations or communications of any sort between Commission staff or Commissioners and any of the four applicants ultimately designated as "pioneers" after the dates on which the Commission considers the proceedings to have been restricted. Please include any contacts which addressed personal communications services in general; experimental licenses held by applicants (including technical trials or reports of any sort related thereto); or any contacts related to the "pioneer preference" rules as considered in Docket 93-266 or more generally. In your response, please include a listing of all contacts, including those considered to be status inquiries.

Please provide a copy of all written materials submitted to the Commissioners or staff with respect to the above issues.

9.
 - a. Do any of the technical or other reports on the experimental licenses of the four applicants who received a "pioneer preference" award, filed on or after the dates on which the Commission considers the PCS "Pioneer Preference" proceeding to have become restricted, address or respond to arguments made by commenters concerning any of the recipient's qualifications to receive a pioneer preference?
 - b. If your answer to the above question is "no", please address your understanding of the meaning of Mtel's statement in its progress report, filed June 29, 1992, that "Mtel decided to revise its planned test schedules and first evaluate its Multi-Carrier Modulation ("MCM") techniques in order to conclusively address comments made by other parties in response to Mtel's June 1, 1992, NWN Technical Feasibility Demonstration", and its submission therein of materials bolstering its claim that it could achieve the data rates for which it ultimately was awarded a preference.
 - c. Were any of the reports filed in the Experimental License files by the four "Pioneer Preference" recipients served by those recipients on parties opposing their "Pioneer Preference" awards? Did

the Commission's rules require service of these reports on the entities opposing the "Pioneer Preference" awards made by the Commission?

- d. Were any procedures established by the Commission to notify opponents to the awards that the reports had been received, or that the recipients had met with Commissioners or Commission staff regarding the experimental licenses, or reports associated therewith? If not, would such notice and opportunity to comment have been proper?
 - e. Has the Commission determined that no ex parte information received by the Commissioners or Commission staff on or after the dates on which the proceedings became restricted was considered by the staff in its recommendations that the "Pioneer Preference" recipients were so entitled? If so, what is the basis for such a determination?
 - f. Has the Commission determined that no ex parte information received by the Commissioners themselves, either directly or through the staff, on or after the date the proceedings became restricted, was considered in determining whether the recipients were entitled to "Pioneer Preferences"? If so, what is the basis for such a determination?
10. With respect to the four entities ultimately designated as recipients of "Pioneer Preference" awards, please respond to the following questions:
- a. On what dates did Commission personnel visit the sites at which experiments were conducted to verify the results of the trials?
 - b. Please furnish the Subcommittee with the names and titles of all such personnel.
 - c. Please describe the reports that were drafted subsequent to site visits.
 - d. How were such reports treated by the Commission? Were they placed in the Public File? Were they released to the public so as to permit comments? Please detail any comments that were received by the Commission in response to their release to the public.

- e. Did the Commission establish an internal review process for such reports? Please list the names and titles of all Commission personnel involved in such a review.
 - f. Did the Commission establish a "Peer Review" process for the independent review of testing results? If so, please furnish the Subcommittee with a description of such a process, including the names and credentials of any "Peer Review" panel that examined and verified test results.
11. With respect to the site visits referred to above, please furnish the Subcommittee with the following information:
- a. During the conduct of the testing, how many channels were utilized for each applicant during each test?
 - b. What channel assignments were utilized for each test? Were these the same channel assignments, or at least in the same frequency band, as the assignments that had been granted for the four recipients of the "Pioneer Preference" designation? If not, how does the Commission intend to enforce its condition that "each licensee must build a system that substantially uses the design and technologies upon which its preference award is based"?
 - c. During the conduct of the testing, how many base stations were built for each of the four recipients? How far apart were the base stations? During the course of the site visits, how many handsets were the Commission personnel able to verify were deployed? How many hand-offs were recorded by Commission personnel?
12. a. During the course of the Committee's deliberations concerning the auctioning provisions of last year's "Omnibus Budget Reconciliation Act", there were varying estimates of the amount of revenue that would be received by the Government as the result of assigning frequencies by competitive bidding. It is my understanding that the most recent estimate by the Office of Management and Budget is \$30 per "pop" (unit of population). Using this estimate, please furnish the Subcommittee with an analysis of revenue foregone directly for the four licenses that will not be

Mr. William Kennard
Page 7

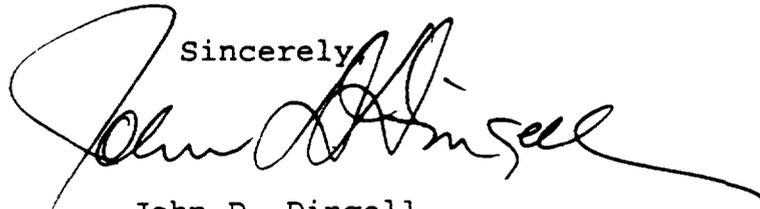
issued by competitive bidding procedures if the Commission issues licenses to the four recipients of "Pioneer Preference" awards.

- b. In addition, please furnish the Subcommittee with your analysis of the effect that issuing these four licenses at no cost to the licensee is likely to have on those who might be prospective bidders for one of the remaining licenses. Please make every attempt to quantify the impact of issuing these licenses without a cost on the bidding strategies of potential bidders.

Please respond to these questions no later than the close of business on Friday, May 27, 1994. If you have any questions regarding the Subcommittee's investigation, please do not hesitate to contact David Leach of the Committee staff at (202) 225-3147, or Reid P.F. Stuntz of the Subcommittee staff at (202) 225-4441. Thank you for assisting the Subcommittee in its investigation of this matter.

With every good wish.

Sincerely,



John D. Dingell
Chairman
Subcommittee on Oversight
and Investigations

cc: The Honorable Dan Schaefer, Ranking Republican Member
Subcommittee on Oversight and Investigations

The Honorable James Quello, Commissioner

The Honorable Andrew Barrett, Commissioner

The Honorable Ervin Duggan, Former Commissioner

The Honorable Reed Hundt, Chairman
Federal Communications Commission

Attached Service List

CERTIFICATE OF SERVICE

I certify that copies of the foregoing CONSOLIDATED REPLY TO OPPOSITIONS TO PETITION FOR RECONSIDERATION are being forwarded by hand delivery and first class United States mail, postage prepaid, on this 6th day of MaY 1994 to the parties on the attached list.

Kelli S Bechtel

Kelli S. Bechtel

Service List

The Honorable John D. Dingell, Chairman
U.S. House of Representatives
Subcommittee on Oversight and Investigations
of the
Committee on Energy and Commerce
Washington, D.C. 20515-6116

Mr. William Kennard
General Counsel
Federal Communications Commission
1919 M Street, N.W., Room 614
Washington, D.C. 20554

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

The Honorable Andrew Barrett, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

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

Organization

Address

AMSC Subsidiary Corporation	Lon C. Levin 10802 Park Ridge Blvd. Reston, VA 22091
APSCO	John D. Lane Wilkes, Artis, Hedrick & Lane 1666 K Street, N.W. Washington, D.C. 20006
APSCO- Arizona	Shannon Fitzsimmons 755 Grant Road Tuscon, Arizona 85703
AT&T	Francine J. Berry 295 North Maple Avenue Basking Ridge, NJ 07920
Adelphia	Stuart F. Feldstein Fleischman and Walsh 1400 Sixteenth Street, N.W. Washington, D.C. 20036
Adelphia Communications Corp.	Randall D. Fisher 5 West Third Street Coudersport, PA 16915
Advanced Mobilecom & Digital Spread Spectrum Technologies	Robert B. Kelly Kelly, Hunter, Mow & Povich 1133 Connecticut Avenue, N.W. Washington, D.C. 20036
	Harold C. Davis

Advanced Wireless Communications, Inc.	82 Devonshire Street, R25D Boston, MA 02109
Alcatel Network Systems	Ellen S. Deutsch Thelen, Marrin, Johnson & Bridges 2 Embarcadero Center San Francisco, CA 94111
Alliance of Rural Area Telephone and Cellular Service Providers	Robert J. Miller Gardere & Winne 1601 Elm Street, Suite 3000 Dallas, TX 75021
Alltel Service Corp.	David L. Nace Lukas, McGowan, Nace & Gutierrez, Chtd. 1819 H Street, N.W., Seventh Floor Washington, D.C. 20006
American Gas Association	Diane Smith 1710 Rhode Island Ave., N.W. Suite 1000 Washington, D.C. 20036
American Mobile Satellite Corporation	Jeffrey L. Clarke 1515 Wilson Blvd. Arlington, VA 22209
American Mobile Telephone Association	Glenn S. Richards Fisher, Wayland, Cooper & Leader 2001 Pennsylvania Avenue, N.W. Suite 400 Washington, D.C. 20006-1851
American Personal Communications	Alan R. Shark 1835 K Street, N.W., Suite 203 Washington, D.C. 20006
American Petroleum Inst.	Kurt A. Wimmer Covington & Burling 1201 Pennsylvania Ave., N.W. P.O. Box 7566 Washington, D.C. 20044
American Portable Communications, Inc.	Wayne V. Black Keller & Heckman 1001 G Street, N.W., Suite 500 W Washington, D.C. 20001
American SMR Network Association	George Y. Wheeler Korteen & Naftalin 1150 Connecticut Ave., N.W. Suite 1000 Washington, D.C. 20036
American Telezone Intercell International Inc.	Russell J. Fox 1835 K Street, N.W. Washington, D.C. 20006
Ameritech	13103 N. Moss Creek Drive Cypress, TX 77429
	Robert N. Reiland 30 South Wacker Drive

	Suite 3900 Chicago, IL 60606
	Frank Michael Panek 2000 W. Ameritech Center Drive Room 4H84 Hoffman Estates, IL 60196-1025
Anchorage Telephone Utility	Robert L. Vasquez 600 Telephone Avenue Anchorage, Alaska 99503
Andrew Corporation	James Gunn 1850 North Greenville Suite 100 Richardson, TX 75081
The Appellant Parties	Stephen G. Kraskin Kraskin & Associates 2120 L Street, N.W., Suite 810 Washington, D.C. 20037
Apple Computer, Inc.	James F. Lovette One Infinite Loop, MS:301-4J Cupertino, CA 95014
Applied Telecommunications Technologies, Inc.	20 William Street Wellesey, Massachusetts 02181
Arch Communications Group, Inc.	C.E. Baker 1800 West Park Drive, Suite 250 Westborough, MA 01581
Arraycomm, Inc.	Walter H. Sonnenfeldt Walter Sonnenfeldt & Associates 4904 Ertter Drive Rockville, MD 20852
Associated PCN Co.	Robert J. Keller Fleischman and Walsh 1400 16th Street, N.W. Washington, D.C. 20036
Associated Public-Safety Communications Officers	Robert E. Hall P.O. Box 669 New Smyrna Beach, FL 32170
Association for Private	David E. Weisman Allan S. Tilles Meyer, Faller, Weisman & Rosenberg, PC 4400 Jenifer Street, N.W. Suite 380 Washington, D.C. 20015
Association of American Railroads	50 F Street, N.W. Washington, D.C. 20001
Atlantic Cellular Company	Gerald S. McGowan Lukas, McGowan, Nace & Gutierrez 1819 H Street, N.W., Seventh Floor Washington, D.C. 20006
Bell Atlantic	James H. Barker Latham & Watkins

Bell Communications Research, Inc.	1001 Pennsylvania Ave., N.W. Suite 1300 Washington, D.C. 20004
Bellsouth Corporation	Michael S. Slomin 290 W. Mt. Pleasant Avenue Livingston, NJ 07039
Berlin	William B. Barfield 1155 Peachtree Street, N.E. Atlanta, GA 30367-6000
Broadband Communications Corporation	Riley Murphy 1100 Poydras Street, Suite 2950 New Orleans, LA 70163
CCI	Dennis F. Begley Reddy, Begley & Martin 2033 M Street, N.W. Washington, D.C. 20036
CFW Telephone Company	Thomas J. Casey Skadden, Arps, Slate, Meagher & Flom 1440 New York Avenue, N.W. Washington, D.C. 20005
CNET	James C. Quarforth 401 Spring Lane, Suite 300 P.O. Box 1990 Waynesboro, VA 22980
CTIA	David Lemon 4975 Preston Park Blvd. 8th Floor Plano, TX 75093
Cable USA, Inc.	Philip L. Verveer Wilkie, Farr & Gallagher 1155 21st Street, N.W., Suite 600 Washington, D.C. 20036
Cablevision Systems	James F. Ireland Cole, Raywid & Braverman 1919 Pennsylvania Avenue Second Floor Washington, D.C.
Calcell Wireless, Inc.	Charles D. Ferris James A. Kirkland Mintz, Levin, Cohn, Ferris, Glovsky & Popeo 701 Pennsylvania Ave., N.W., Suite 900 Washington, D.C. 20004
California Microwave	Verner, Liipfert, Bernard McPherson & Hand 901 15th Street, N.W., Suite 700 Washington, D.C. 20005
	David B. Leeson

California Public Safety Radio Association, Inc.	985 Almanor Sunnydale, CA 94806
California Public Utilities Commission	Lynn Diebold 4016 Rosewood Avenue Los Angeles, CA 90004
Capital Cities/ABC, Inc.	Ellen S. Levine 505 Van Ness Avenue San Francisco, CA 94102
Cellnet	Kenneth J. Brown 77 West 66th Street New York, NY 10023
Cellular Service, Inc.	F. G. Harrison Hanover House 49-60 Borough Road London SE1 1DS England
Celsat	Nancy J. Thompson Reed, Smith, Shaw & McClay 1200 18th Street, N.W. Washington, D.C. 20036
Centel Corporation	Simone Wu Skadden, Arps, Slate, Meagher & Flom 1440 New York Ave., N.W. Washington, D.C. 20005
Century Cellunet, Inc.	Charles F. Wright 8725 Higgins Road Chicago, IL 60631
Chesnee Telephone Company	Harold Mordkofsky Blooston, Mordkofsky, Jackson & Dickens 2120 L Street, N.W., Suite 300 Washington, D.C. 20037
Cincinnati Bell Telephone	Pansy M. Askins P.O. Box 430 Chesnee, SC 29323
Citizens Utilities Co.	Robert E. Sigmon 201 E. Fourth Street, 102-320 P.O. Box 2301 Cincinnati, Ohio 45201
City Utilities of Springfield	Ellen S. Deutsch P.O. Box 496020 1035 Placer Street Redding, CA 96049-6020
Clear Creek, Et Al.	W. Randolph Young 1050 17th Street, N.W., Suite 1200 Washington, D.C. 20036
	Andrew D. Lipman Swindler & Berlin