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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY



Building The
Wireless Future™

CTIA

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June 1, 1994

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: *Ex Parte* Presentation
GEN Docket No. 90-314

Dear Mr. Caton:

On June 1, 1994, a copy of the attached letter from Thomas E. Wheeler, President and CEO of the Cellular Telecommunications Industry Association (CTIA), was delivered to Chairman Reed E. Hundt.

Pursuant to Section 1.1206(a)(1) of the Commission's Rules, an original and one copy of this letter are being filed with your office.

If you have any questions concerning this submission, please contact the undersigned.

Sincerely,


Andrea D. Williams
Staff Counsel

Attachment

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Thomas E. Wheeler
President / CEO

June 1, 1994

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

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

Dear Mr. Chairman:

On behalf of the Cellular Telecommunications Industry Association (CTIA), I bring to your attention another matter concerning parity among existing and new providers of wireless telecommunications services. This time the matter is the effective radiated power (or ERP) permitted cellular carriers as compared with the pending determination of the ERP for providers of personal communications services (PCS).

It is my understanding that the Commission is considering a 1,000 watt ERP level for PCS base stations. Such a proposal conflicts with the 100/500 watts ERP de facto limitation imposed upon existing cellular systems.

A majority of the MSAs were built out in accordance with the Commission's original cellular rules. These rules limited cellular base stations to 100 watts ERP. The Commission subsequently raised the ERP limits to 500 watts, but the 500 watts ERP rule applied only to RSAs, not MSAs. Although the Commission eventually eliminated the MSA/RSA distinction and extended the 500 watts ERP limitation to all cellular base stations, cellular carriers already had constructed most of their MSAs pursuant to the 100 watts ERP limitation. The basic architecture of a cellular system, which requires limiting base station power to avoid interference and thereby permit frequency reuse, precluded these cellular carriers from raising their power levels to 500 watts ERP in their MSA markets. Thus, cellular carriers can only take advantage of the 500 watts ERP level in

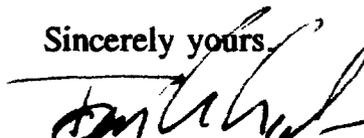
Letter to The Honorable Reed E. Hundt
June 1, 1994
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their RSA markets, just as the Commission originally intended. There is no parity when such cellular carriers are forced to compete with PCS providers which are afforded higher ERP levels within larger service areas, i.e., MTA and BTA markets.

In support of parity between cellular and PCS coverage, CTIA urges the Commission to adopt rules which limit the increased PCS power level to rural areas only. By adopting such rules, providers of PCS will be afforded the same urban and rural coverage as cellular carriers operating under the de facto 100/500 watts ERP rule.

Sincerely yours,



Thomas E. Wheeler

cc: Hon. James H. Quello
Hon. Andrew C. Barrett
Hon. Rachele B. Chong
Hon. Susan Ness
Ms. Karen Brinkmann
Dr. Robert Pepper
Mr. Donald Gips
Mr. Rudolfo M. Baca
Mr. Byron F. Marchant
Ms. Jane E. Mago
Mr. Richard K. Welch
Ms. Rosalind Allen
Mr. Gregory J. Vogt