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JUN 22 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

CTIA

Cellular
Telecommunications
Industry Association
1250 Connecticut
Avenue, N.W.
Suite 200
Washington, D.C. 20036
202-785-0081 Telephone
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June 22, 1994

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

Re: *Ex Parte* Presentation
PP Docket No. 93-253

Dear Mr. Caton:

On June 22, 1994, a copy of the attached letter from Mr. William J. Ryan, President and CEO of Palmer Communications, Inc., 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 and attachment 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

No. of Copies rec'd
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OH

PALMER COMMUNICATIONS INCORPORATED

William J. Ryan
President and Chief Executive Officer
813.433.8210



12800 University Drive
Ft. Myers, Florida 33907-5333
FAX 813.433.8213

June 21, 1994

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

RE: Competitive Bidding for Broadband Personal
Communications Services, PP Docket No. 93-253

Dear Chairman Hundt:

The Commission will make a very important decision on June 29 concerning the rules for auctioning broadband PCS licenses. As a small cellular company owned and controlled by women, Palmer Communications Incorporated ("Palmer Communications") is keenly interested in your determination of the preferences to be created for so-called "designated entities" and, particularly businesses owned or controlled by women.

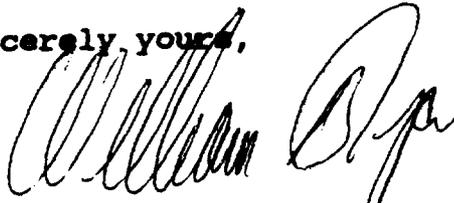
Of course, Palmer Communications was encouraged by the passage of the Omnibus Budget Reconciliation Act of 1993 (OBRA). Like any other prospective PCS provider, Palmer would like to secure an advantage which would increase its chances of prevailing in the auction. However, of particular importance to Palmer Communications and, perhaps to the Commission, is the issuance of broadband PCS licenses to winning bidders without unnecessary delay. Thus, Palmer Communications would rather urge adoption of reasonable and proportionate preferences in the hope that such rules will avoid unnecessary and potentially destructive delay. The plans proposed in the last few days, in the opinion of Palmer Communications, would disproportionately favor one type of designated entity and invite the kind of challenges which will significantly slow the distribution of new spectrum.

Of the various potential elements of the so-called "entrepreneur block" approach, Palmer Communications would support the following: (1) bidding eligibility for companies with annual revenues below \$125 million; (2) annual revenues of less than \$40 million to qualify as a small business; (3) equity ownership of at least 50.1% to qualify for preferences available to small businesses and businesses owned by minorities and women; (4) bidding credits, which do not differentiate among designated entities by more than 10%.

Honorable Reed E. Hundt
June 21, 1994
Page 2

Please consider these views as you move toward your decision on June 29. As indicated above, Palmer Communications believes that reasonably proportionate preferences for designated entities will discourage legal challenges, speed new spectrum to prospective PCS licensees and new wireless services to the American consumer.

Sincerely yours,



William J. Ryan
President and Chief Executive Officer

cc: Commissioner James H. Quello
Commissioner Andrew C. Barren
Commissioner Rachelle B. Chong
Commissioner Susan Ness