

RECEIVED

JUL - 8 1994

LAW OFFICES OF
WILLIAM J. FRANKLIN,
CHARTERED

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

1919 PENNSYLVANIA AVENUE, N.W.
SUITE 300
WASHINGTON, D.C. 20006-3404

(202) 736-2233
TELECOPIER (202) 452-8757
AND (202) 223-6739

July 8, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Via Messenger

Re: **GEN Docket No. 93-253**
Implementation of Section 309(j)
of the Communications Act

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Submitted herewith on behalf of Cellular Settlement Groups ("CSG") are an original plus eleven (11) copies of its Comments on Oppositions to Petitions for Reconsideration of the Second Report and Order in the above-referenced docket.

Please contact my office directly with any questions or comments concerning the attached.

Respectfully submitted,


William J. Franklin
Attorney for Cellular
Settlement Groups

Encs.

cc: Cellular Settlement Groups

No. of Copies rec'd
List ABCDE

0411

RECEIVED

JUL - 8 1994

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Implementation of Section 309(j)) PP Docket No. 93-253
of the Communications Act)
)
Competitive Bidding)
To: The Commission

**COMMENTS FILED BY THE
CELLULAR SETTLEMENT GROUPS
ON OPPOSITIONS TO
PETITIONS FOR RECONSIDERATION
OF THE SECOND REPORT AND ORDER**

Houston CUSA Settlement Group, L.C., Dallas CUSA Settlement Group, L.C., Oxnard CUSA Settlement Group, L.C., and Huntington CUSA Settlement Group, L.C., (collectively, the "Cellular Settlement Groups"), by their attorney and pursuant to Section 1.429(g) of the Commission's Rules, hereby comment on the Oppositions apparently filed with respect to the various Petitions for Reconsideration of the Commission's Second Report and Order in the above-captioned proceeding.^{1/} The Cellular Settlement Groups timely filed one of those Petitions for Reconsideration.

In their Petition, the Cellular Settlement Groups argued that, upon reconsideration of the Second R&O, the Commission must clarify its generic auction rules to specify that full settlements are permissible between mutually exclusive applications for auctionable licenses, including unserved-area cellular licenses.

^{1/} 9 FCC Rcd _____ (FCC 94-61, released April 20, 1994) ("Second R&O").

To the best of the Cellular Settlement Groups's knowledge (based on received service copies), no party opposed their Petition.^{2/}

Accordingly, the Cellular Settlement Groups respectfully requests that the Commission reconsider the Second Report and Order as set forth in their Petition for Reconsideration.

Respectfully Submitted,

CELLULAR SETTLEMENT GROUPS

By: William J. Franklin
William J. Franklin
Their Attorney

WILLIAM J. FRANKLIN, CHARTERED
1919 Pennsylvania Avenue, N.W.
Suite 300
Washington, D.C. 20006-3404
(202) 736-2233
(202) 452-8757 (Telecopier)

^{2/} To the extent that some party opposed the Cellular Settlement Groups' position but failed to serve the undersigned, the Groups reserve their rights to file a supplemental Reply.