

Small Business PCS Association
96 Hillbrook Drive Portola Valley, CA 94028
415-851-1615 FAX: 415-851-1870

SUNSHINE PERIOD

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JUN 27 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

DATE: June 20, 1994

TO: Mr. Don Gips
Federal Communications Commission

FAX: 202-632-1587

FROM: Bob Kyle

FAX: 415-851-1870

PHONE: 415-851-1615

Number of pages (including this page): 5

Message:

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FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF SECRETARY

Mr. Don Gips
 Federal Communications Commission
 1919 M Street NW
 Washington, DC 20554

RE: PP Docket No. 93-253

Dear Don:

We at SBPCS were very concerned to hear yesterday that the maximum passive investment in SWMRS may be lowered to 49.9%. This will make it virtually impossible for any SWMR in the country to get financing. The 80% limit for passive investment previously suggested by the FCC is highly preferable.

Another major area of concern, expressed in my May 13 letter, is the revenue limit for the Entrepreneurial Block. If the limit is not lowered to \$40 million or less the Entrepreneurial Blocks will not diversify ownership in the communications industry, as Congress has mandated, but will merely expand the roll of existing medium sized telecommunications companies in an industry where they are already major players.

Lastly, we are concerned that the Entrepreneurial Block will be auctioned at a date later than other licenses, particularly the 30 MHz MTAs. It is our view that in PCS a company's ability to quickly deploy infrastructure is critical to their success. Therefore, we ask that recipients of Entrepreneurial Block licenses be given an equal chance by awarding their licenses at the same time, or before, their large company MTA competitors.

Best of luck in your activities finalizing the broadband PCS rules.

Sincerely,



Robert H. Kyle
 Chairman