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PP Dkt. 93-253

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June 18, 1994 FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. Greg Roston
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RE: PP Docket No. 93-253

Dear Greg:

Thank you for the phone call earlier today about the entrepreneurial frequency blocks. We at SBPCS were very concerned to hear 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 Blocks 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

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