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GURMAN, KURTIS, BLASK & FREEDMAN
CHARTERED

SUITE 500
1400 SIXTEENTH STREET, N.W.
WASHINGTON, D.C. 20036

(202) 328-8200
TELECOPIER: (202) 462-1784

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AUG 26 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

August 26, 1994

HAND DELIVERED

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Stop Code 1170
Washington, D.C. 20554

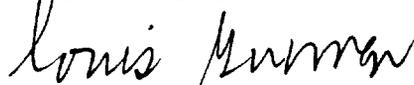
Re: Ex Parte Communication in
PR Docket No. 93-61

Dear Mr. Caton:

On August 25, 1994, Louis Gurman, Jonathan Riso and Keith Rainer, all representing Southwestern Bell Mobile Systems, Inc., had separate meetings with Jill Lockett (Commissioner Chong), David Siddall (Commissioner Ness), Lisa Smith (Commissioner Barrett), Rudy Baca (Commissioner Quello) and Ruth Milkman (Chairman Hundt), respectively. Pursuant to Section 1.1206(a)(1) of the Commission's Rules, I am filing the original and one copy of the enclosed written ex parte presentation which was provided to each of the above named Commissioner advisors.

Please call me if you have any questions regarding this notice.

Very truly yours,



Louis Gurman

cc: Rudy Baca
Jill Lockett
Ruth Milkman
David Siddall
Lisa Smith

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041

A VM/LMS NPRM

Comments on Proposed Rule Making
August 25, 1994

 Southwestern Bell Mobile Systems

FEDERAL COMMUNICATIONS COMMISSION
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Outline

- ◆ Part 15
- ◆ Band Plan
- ◆ Licensing Areas
- ◆ Transition Period
- ◆ Auction
- ◆ Voice Services

Part 15

- ◆ Agree that Part 15 status in relation to AVM/LMS should not change.
- ◆ Agree in principle with the “presumption of interference” specifications.

Band Plan

- ◆ Agree that there should be “exclusive” bands for wideband AVM/LMS operations.
 - Still subject to interference from, and may not interfere with, primary users in band:
 - » Industrial, Scientific, and Medical Users, and
 - » Federal Government Location Systems.
 - Must still allow other non-interfering users in band:
 - » Part 15, and
 - » Amateur Radio.

Band Plan (cont.)

- ◆ “Exclusive” allocations should be smaller.
 - Six MHz is too large for all existing systems.
 - » AirTouch:
 - ◆ Needs a wideband of 3.87 MHz for location.
 - ◆ Wants more as buffer for unused side lobe emissions.
 - » MobileVision:
 - ◆ Needs a wideband of 4 MHz for location.
 - ◆ Wants more for extensive voice and data channels.
 - Additional bandwidth is not required for improving capacity, accuracy, or interference rejection.

Band Plan (cont.)

- ◆ There should be more than two wideband AVM/LMS bands per area.
 - Having only two licenses in each area:
 - » discourages new service providers nationwide.
 - » restricts competition within each area.
 - » requires removal of at least one licensed and built system in Chicago.
 - A third or fourth service provider would add:
 - » competition in price, coverage, and service innovation.

Band Plan (cont.)

- ◆ Spectrum should be allocated for forward links.
 - Suggest as far from wideband frequencies as practical.
 - Suggest a minimum of 250 KHz per AVM/LMS system.

- ◆ Forward link allocations should be “exclusive” of other AVM/LMS users.
 - As “exclusive” as the wideband allocation.

Licensing Areas

- ◆ Prefer licensing MSAs and RSAs.
- ◆ Licensing BTAs also workable.
 - More manageable system construction than MTAs.
 - Build out rules must be specific.
- ◆ MTAs are too large for licensing areas.
 - Will require loose build out rules.
 - Will require long build out periods.
 - Will encourage fallow spectrum.

Transition Period

- ◆ All existing unbuilt licenses **must be cancelled immediately** upon the effective date of the Order.
 - Must end current spectrum hoarding.
 - » AirTouch has 240+ licenses, many for several years, but built only 6 commercial systems.
 - » MobileVision has 150+ licenses but built only 3 skeletal systems and no commercial systems.
 - » Uniplex has 40+ licenses but built none.
 - » Pinpoint has many licenses but built none.
 - Hundreds of prime licenses will not expire for years.
 - Waiting for licenses to expire reduces spectrum value.

Auction

- ◆ Auctioning is acceptable only if proper procedures are established.
- ◆ A very short transition period for existing systems and no transition period for unbuilt licenses are required for an effective auction.
 - A short transition will add value to the spectrum at the auction.
 - Auction winner deserves clean spectrum, since winner will be paying for it.

Voice Services

- ◆ What will be the permissible use of voice?
 - Suggest keeping voice a truly ancillary function.
 - Suggest restricting communication to a channel between the mobile unit and a single point of contact, such as an emergency response team.
 - Suggest prohibiting direct access to the Public Switched Telephone Network.
- ◆ Allowing extensive voice may diminish the value of the narrowband and wideband PCS licenses.