

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 30 1994



Building The
Wireless Future™

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
202-785-0721 Fax
202-736-3256 Direct Dial

Randall S. Coleman
Vice President for
Regulatory Policy and Law

August 30, 1994

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

RE: *Ex Parte* Contact Concerning Personal Communications Services,
GEN Docket No. 90-314, and Auction Design for Broadband
Personal Communications Services, PP Docket No. 93-253 ✓

Dear Mr. Caton:

On Tuesday, August 30, 1994, the undersigned, on behalf of the Cellular Telecommunications Industry Association (CTIA), met with Ms. Jill Luckett, Special Advisor to Commissioner Rachelle B. Chong. The discussion concerned the population overlap and ownership attribution rules applicable to cellular companies in the Personal Communications Services (PCS) and the current rules governing eligibility to bid for the "entrepreneur's blocks" in the pending broadband PCS auctions. The issues summarized in the attachments and the views expressed in this meeting reflect CTIA's positions as previously filed in these proceedings.

Pursuant to Section 1.1206(a)(1) of the Commission's Rules, an original and one copy of this letter are being filed with your office. Please contact me if you have any questions concerning this submission.

Sincerely,

Randall S. Coleman

Attachments

No. of Copies rec'd 0 + 1
List ABCDE

EX PARTE OR LATE FILED

RECEIVED



AUG 30 1994

Building The
Wireless Future..

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

CTIA

August 2, 1994

Mr. Byron Marchant
Senior Legal Advisor
to Commissioner Barrett
Federal Communications Commission
1919 M Street, N.W. - Room 826
Washington, D.C. 20554

Cellular
Telecommunications
Industry Association
1250 Connecticut
Avenue, N.W.
Suite 200
Washington, D.C. 20036
202-785-0081 Telephone
202-785-0721 Fax
202-736-3256 Direct Dial

Randall S. Coleman
Vice President for
Regulatory Policy and Law

RE: Ex Parte Filing - Docket No. 90-314
Personal Communications Service

Dear Byron:

In response to your request for information, attached are a series of matrices outlining the nature and extent of the impact of the overlap rules on cellular service providers.

First is a copy of a letter which was originally filed with the Commission on June 6, 1994, transmitting a matrix for ten Major Trading Areas (MTAs) and a series of nine matrices for Basic Trading Areas (BTAs). These matrices demonstrate the impact of the overlap restrictions on selected cellular companies. The matrices also indicate the number of conflicts at differing overlap levels -- including both the current ten percent threshold and a sequence of higher thresholds.

Also attached are two updated tables, profiling some 80 BTAs.

The first updated table is a survey of the top 50 BTAs, ranked by population in descending order from most populous to less populous. It includes the population of the BTAs, according to 1994 estimates by Paul Kagan Associates, and notes the share of those "pops" served by cellular licensees, calculated in accordance with the Commission's *Second Report and Order* in GEN Docket No. 90-314.

This table demonstrates that raising the overlap threshold from 10 percent to 20 percent could benefit smaller cellular companies. In the top 50 BTAs, eight additional opportunities would be afforded to small cellular companies by a targeted increase in the overlap threshold to 20 percent. These 50 BTAs are home to 152.7 million people -- 58.3 percent of the estimated 261.7 million Americans. Raising the

overlap threshold would permit these small companies to compete for markets in which 8.6 million people live -- 5.6 percent of the population of those markets, and 3.2 percent of the American people.

- Raising the threshold to 20 % would create eight additional opportunities for small companies (starting at BTA 28 -- Charlotte, NC -- and extending down to BTA 50).
- Raising the threshold to 25 % would create three additional opportunities (for a total of eleven additional opportunities).

The second table is a survey of 30 selected BTAs, drawn from the BTAs below the top 50, and is also ranked in descending order according to population. In fact, they are approximately ranked as follows: Lafayette through Evansville, 100-104 from the top; Provo through Brownsville, 168-172 from the top; Williamsport through Danville, 273-277 from the top; Kankakee through Harrisonburg, 323-327 from the top; Ashtabula through Eagle Pass, 378-382 from the top; and Stillwater through Watertown, roughly 433-437 from the top. (Precise ranking depends on population growth from 1990 to 1994.)

These 30 markets are home to another 6.4 million people. Raising the overlap threshold (on a targeted basis) to 20 percent would create 12 additional opportunities for small cellular companies to extend their service areas, and compete in expanding the variety of wireless services available to Americans living outside the top markets, in rural and small town America.

- Raising the threshold to 20 % would create twelve additional opportunities for small companies in six BTAs in which 1.7 million Americans live.
- Raising the threshold to 25 % would create three additional opportunities (for a total of 15 additional opportunities in nine BTAs in which 2.26 million people live).
- Raising the threshold to 30 % would create three additional opportunities (for a total of 18 additional opportunities in ten BTAs in which 2.34 million people live).
- Raising the threshold to 35 % would create three additional opportunities (for a total of 21 additional opportunities in 12 BTAs in which 2.6 million people live).
- Raising the threshold to 40 % would create three additional opportunities (for a total of 24 additional opportunities in 14 BTAs in which 2.8 million people live).

These additional opportunities do not mean that there will be one less wireless provider than is theoretically possible at the maximum. Rather, they mean that there will be one or two or three more potential service providers with experience in the marketplace, and incentives to deliver on the promise of the information age to rural and small town America.

A final attachment is composed of a series of maps and overlays, which illustrate the anomalous effect noted in CTIA's recent Petition for Reconsideration -- in which the Commission's overlap rules and narrow divestiture "window" act to limit the ability of existing service providers to extend service to adjacent areas, or link existing service areas, in the broader wireless markets which the Commission has established.

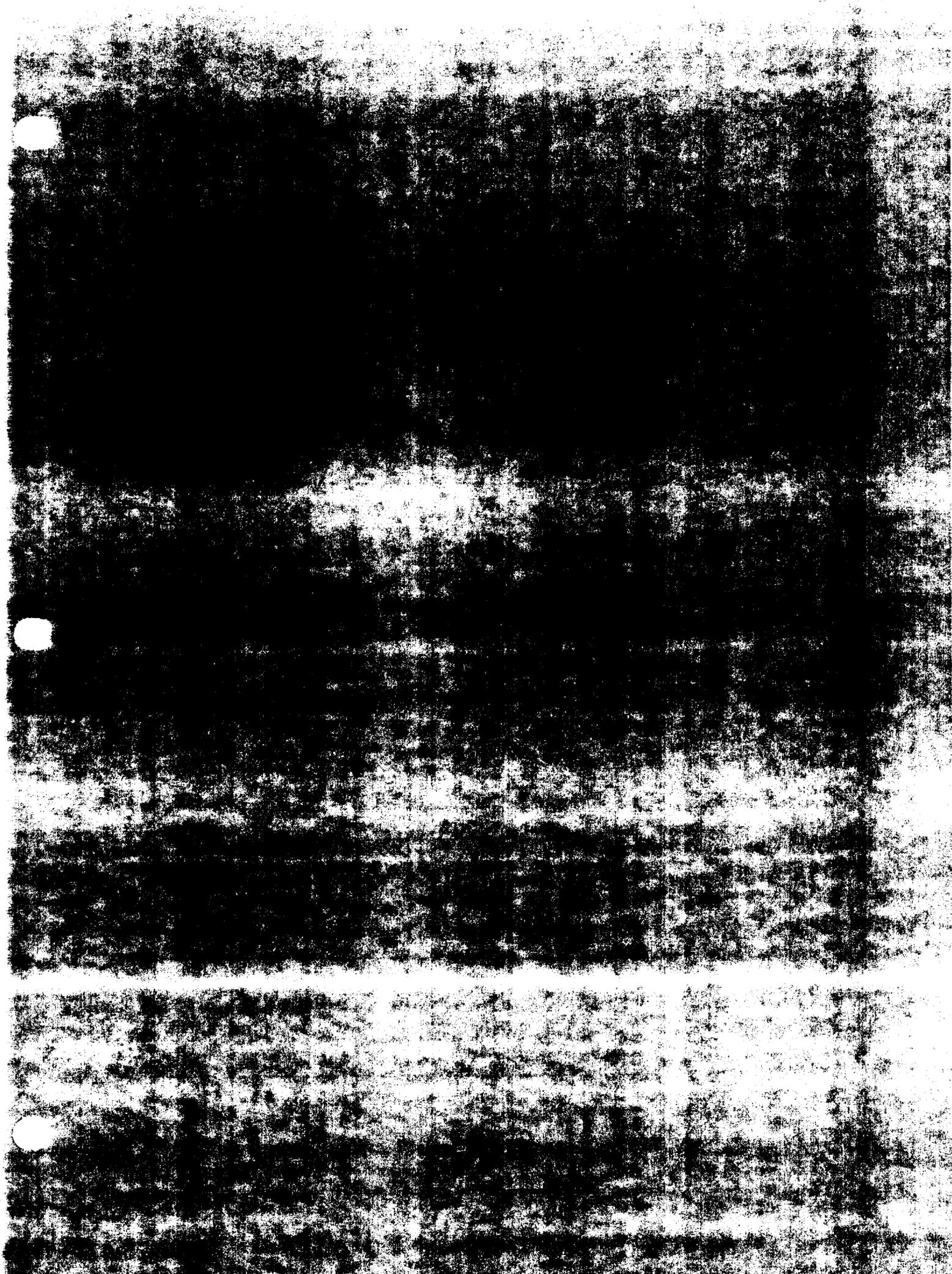
If there are any questions in this regard, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "R. S. Coleman", with a long horizontal flourish extending to the right.

Randall S. Coleman

Attachments



Handwritten signature



Building The
Wireless Future.

CTIA

Cellular
Telecommunications
Industry Association
1250 Connecticut
Avenue, N.W.
Suite 200
Washington, D.C. 20036
202-785-0081 Telephone
202-785-0721 Fax

June 6, 1994

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

RECEIVED

JUN - 6 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Mr. Caton:

On Monday, June 6, 1994, in response to a request from Mr. Byron F. Marchant, Legal Assistant to Commissioner Andrew Barrett, the Cellular Telecommunications Industry Association ("CTIA") provided copies of the attached analyses of the Commission's attribution and overlap rules, and their impact on cellular carriers at both the Major Trading (MTA) and Basic Trading Area (BTA) levels, to the following Commission staff:

Chairman Reed Hundt
Commissioner Andrew Barrett
Commissioner James Quello
Commissioner Susan Ness
Commissioner Rachelle Chong
Mr. Ralph Haller
Dr. Robert Pepper
Mr. Jim Casserly

Ms. Karen Brinkmann
Mr. Byron Marchant
Mr. Rudy Baca
Ms. Jane Mago
Ms. Roz Allen
Mr. Greg Rosston
Mr. Donald Gips
Mr. Greg Vogt

Pursuant to Sections 1.1206(a)(3) (non-restricted proceeding, presentation disclosure), 1.1204(b)(7) (exemption from prohibition), and 1.1203(a)-(b) (sunshine period prohibition) of the Commission's rules, an original and one copy of the above-referenced items are being filed with the Secretary's office.

If there are any questions in this regard, please contact the undersigned.

Sincerely,

Handwritten signature of Robert F. Roche
Robert F. Roche



*Building The
Wireless Future..*

CTIA

Cellular
Telecommunications
Industry Association
1250 Connecticut
Avenue, N.W.
Suite 200
Washington, D.C. 20036
202-785-0081 Telephone
202-785-0721 Fax

June 6, 1994

Mr. Byron F. Marchant
Senior Legal Advisor to
Commissioner Barrett
Federal Communications Commission
1919 M Street, N.W. Room 826
Washington, D.C. 20554

RE: Ex Parte Filing
GEN Docket No. 90-314
Personal Communications Services

Dear Mr. Marchant:

Pursuant to your request, the attached matrix indicating Major Trading Area (MTA) and Basic Trading Area (BTA) conflicts has been revised to demonstrate the restrictions experience by cellular companies *based on the attribution and overlap rules adopted by the Commission's Second Report and Order* in GEN Docket No. 90-314.

Background on Exclusions and Partnerships

The companies listed within the matrix are those licensees explicitly impacted on an MTA basis by the overlap rules specified by that Order. The actual impact of the Order, both on an MTA basis and a BTA basis, is much broader than is indicated by the attached matrix, since the rule applies equally to investors holding a 20 percent equity interest in a licensee. Unfortunately, time did not allow for demonstration of such investor or partner conflicts.

Thus, for example, while we can note that the wireline cellular license in the New York *MSA* is held by a partnership, in which NYNEX holds 54.0 percent, Bell Atlantic holds 26 percent, and Sprint Cellular ten percent -- we cannot note the full extent of such partnerships throughout the New York *MTA*.

Likewise, we can note that the non-wireline cellular license in the Los Angeles *MSA* is held by a partnership of BellSouth (with 60.03 percent) and LIN Broadcasting (39.97 percent), and the wireline cellular license in the Los Angeles *MSA* is held by a partnership of AirTouch (82.3 percent), Contel (11.2 percent), U.S. Cellular (5.5 percent) and GTE Mobilnet (1.0 percent). But we cannot note the full extent of similar partnerships throughout the Los Angeles *MTA*.

June 6, 1994
Page 2



Additional BTA Conflicts

As noted in our previous submission of June 1, while the above matrix demonstrates the BTA conflicts of the companies restricted by the application of the rules on an MTA basis, the even more extensive impact of BTA conflicts is not indicated in that matrix. The tables and text which follow the MTA matrix indicate some of those further conflicts.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Robert F. Roche

Director for Research

Attachments

Newp.1

Revised Overlap Matrix for MTA-Barred Companies
(based on the FCC's 2nd Report and Order, GEN No. 90-314)

| MTA | Number of BTAs in MTA | Number of Carriers Barred in MTA | Identities | Number of BTAs in Which Barred by 10% Rule | Number of BTAs in Which Barred by 20% Rule | Number of BTAs in Which Barred by 30% Rule | Number of BTAs in Which Barred by 40% Rule | MTA Eligibility Under Higher Cap? |
|------------|-----------------------|--|------------------------|--|--|--|--|-----------------------------------|
| Atlanta | 14 | 5 | Alltel | 3 | 3 | 3 | 3 | Yes - 20% |
| | | | BellSouth | 7 | 7 | 7 | 7 | No |
| | | | Palmer | 4 | 4 | 4 | 4 | Yes - 20% |
| | | | AirTouch | 3 | 3 | 3 | 3 | No |
| | | | GTE/Contel | 4 | 4 | 4 | 3 | Yes - 20% |
| Birmingham | 10 | 4/5 (including licenses designated for hearing) | BellSouth | 5 | 5 | 5 | 5 | No |
| | | | GTE/Contel | 5 | 5 | 5 | 5 | No |
| | | | Crowley | 2 | 2 | 2 | 2 | Yes - 20% |
| | | | Palmer | 2 | 2 | 2 | 2 | Yes - 20% |
| | | | Designated for hearing | 4 | 3 | 1 | 1 | Yes - 20% |
| Boston | 14 | 4 | NYNEX | 5 | 5 | 5 | 5 | No |
| | | | SWB | 3 | 3 | 3 | 3 | No |
| | | | BAM | 3 | 3 | 3 | 3 | Yes - 30% |
| | | | U.S.Cellular | 7 | 7 | 7 | 7 | Yes - 20% |
| | | | | | | | | |
| Buffalo | 4 | 5/6 (including McCaw partnership with Assoc.) | Ass./SWB | 2 | 2 | 2 | 2 | No |
| | | | NYNEX | 1 | 1 | 1 | 1 | No |
| | | | DICOMM | 2 | 2 | 2 | 2 | Yes - 20% |
| | | | Contel | 2 | 2 | 2 | 2 | No |
| | | | Rochester | 1 | 1 | 1 | 1 | No |
| | | | MCaw | 1 | 1 | 1 | 1 | No |
| Chicago | 18 | 2 | SWB | 8 | 8 | 7 | 7 | No |
| | | | Ameritech | 9 | 9 | 9 | 9 | No |

Note: Eligibility for MTA-wide licenses was considered under various thresholds *within the confines of CTIA's proposal* (i.e., with a 40 percent pop cap). The last column indicates eligibility at various thresholds below that cap.

Revised Overlap Matrix for MTA-Barred Companies
(based on the FCC's 2nd Report and Order, GEN No. 90-314)

| MTA | Number of BTAs in MTA | Number of Carriers Barred in MTA | Identities | Number of BTAs in Which Barred by 10% Rule | Number of BTAs in Which Barred by 20% Rule | Number of BTAs in Which Barred by 30% Rule | Number of BTAs in Which Barred by 40% Rule | MTA Eligibility Under Higher Cap? |
|-------------|-----------------------|--|---|---|--|--|--|---|
| Des Moines | 13 | 6 | U.S.Cellular Sprint C-TEC GTE/Contel U S WEST Cellular Inc. | 9 5 7 5 1 6 | 9 5 4 3 2 4 | 9 5 4 3 1 2 | 9 4 4 2 1 2 | No Yes - 30% Yes - 20% Yes - 20% Yes - 20% Yes - 20% |
| Los Angeles | 7 | 3/4 (including the McCaw share of the L.A.Cellular Partnership) | BellSouth AirTouch U S WEST McCaw (via L.A.Cellular Partnership) | 2 2 1 3 (including L.A.Cellular Partnership) | 2 2 1 3 | 2 2 1 3 | 2 2 1 3 | No No Yes - 20 % No (based on L.A. Cellular) |
| New York | 20 | 4 | NYNEX BAM SNET LIN/McCaw | 7 4 3 1 | 7 4 3 1 | 7 4 3 1 | 7 4 3 1 | No Yes - 20% Yes - 20% No |
| Wash./Balt. | 9 | 2 | SWB BAM | 8 4 | 5 4 | 4 4 | 4 4 | No No |

Note: Eligibility for MTA-wide licenses was considered under various thresholds *within the confines of CTIA's proposal* (i.e., with a 40 percent pop cap). The last column indicates eligibility at various thresholds below that cap.

Atlanta BTA Conflicts

Within the 14 BTAs that make up the Atlanta MTA, there are 39 conflicts between cellular carriers and PCS licensing opportunities under a 10 percent overlap rule. Of those opportunities, four would be opened up by raising the overlap cap to 20 percent. Another five opportunities would be opened up by raising the overlap cap to 30 percent. And a final two opportunities would be opened up by raising the cap to 40 percent -- for a total of 11 additional BTA licensing opportunities.

| Company | BTA Names | Overlap 10-20 | Overlap 20-30 | Overlap 30-40 |
|----------------|-----------------------|---------------|---------------|---------------|
| Mobile | Albany | | 25.0 percent | |
| Sterling | Macon Savannah | | 29.4 percent | 34.9 percent |
| Cellular Plus | Macon | | 26.7 percent | |
| Cranford Cell. | Opelike | | 28.7 percent | |
| Signal | Savannah | 19.6 percent | | |
| Sprint | Savannah | 19.6 percent | | |
| Georgia RSA #8 | Savannah | 13.3 percent | | |
| U.S.Cellular | Cleveland Savannah | 15.1 percent | 23.4 percent | |
| Mobile | Albany | | 25.0 percent | |

Birmingham BTA Conflicts

Likewise, within the 10 BTAs that make up the Birmingham MTA, there are 32 conflicts between cellular carriers and PCS licensing opportunities under a 10 percent overlap rule. Of those opportunities, four would be opened up by raising the overlap cap to 20 percent. Another five opportunities would be opened up by raising the overlap cap to 30 percent. And a final three opportunities would be opened up by raising the cap to 40 percent -- for a total of 12 additional BTA licensing opportunities. (The following table omits those licenses which have been designated for hearing -- although they are also subject to the overlap rule -- regardless of who obtains them.)

| Company | BTA Names | Overlap 10-20 | Overlap 20-30 | Overlap 30-40 |
|----------------|------------------------|------------------------------|---------------|---------------|
| Cranford Cell. | Anniston Birmingham | 10.2 percent | 28.0 percent | |
| ALGREG Cell. | Birmingham Florence | 13.1 percent 15.8 percent | | |
| Pro Max | Dothan Montgomery | | 22 percent | 30.1 percent |
| S. Ala. Cell. | Dothan Montgomery | | 24.7 percent | 30.1 percent |
| W. Ala. Cell. | Tuscaloosa | | | 35.4 percent |

Boston BTA Conflicts

Within the 14 BTAs that make up the Boston MTA, there are 36 conflicts between cellular carriers and PCS licensing opportunities under a 10 percent overlap rule. Of those opportunities, two would be opened up by raising the overlap cap to 20 percent. Another opportunity would be opened up by raising the overlap cap to 30 percent. And another five opportunities would be opened up by raising the cap to 40 percent -- for a total of eight additional BTA licensing opportunities.

| Company | BTA Names | Overlap 10-20 | Overlap 20-30 | Overlap 30-40 |
|-----------------|------------------|---------------|---------------|------------------------------|
| Sterling Cell. | Bangor | | 26.0 percent | |
| Contel Cell. | Keene Lebanon | | | 36.0 percent 32.0 percent |
| Atlantic Cell. | Lewiston | 16.0 percent | | |
| Fair Oaks Cell. | Manchester | | | 36.9 percent |
| Franklin Cell. | Springfield | 10.5 percent | | |
| W. Maine Cell. | Lewiston | | | 36.9 percent |
| StarCellular | Portland | | | 35.2 percent |

Buffalo BTA Conflicts

Within the four BTAs that make up the Buffalo MTA, there are 13 conflicts between cellular carriers and PCS licensing opportunities under a 10 percent overlap rule. Of those opportunities, none would be opened up by raising the overlap cap to 20 percent. Another two opportunities would be opened up by raising the overlap cap to 30 percent. And another three opportunities would be opened up by raising the cap to 40 percent -- for a total of five additional BTA licensing opportunities. The following table omits those licenses which have been designated for hearing -- although they are also subject to the overlap rule -- regardless of who obtains them.)

| Company | BTA Names | Overlap 10-20 | Overlap 20-30 | Overlap 30-40 |
|------------------|-----------|---------------|---------------|---------------|
| Horizon Master | Jamestown | | 24.0 percent | |
| Sprint Cell. | Jamestown | | 24.0 percent | |
| Pinellas Comm. | Olean | | | 36.0 percent |
| Bell Atl. Mobile | Olean | | | 36.0 percent |

Chicago BTA Conflicts

Within the 18 BTAs that make up the Chicago MTA, there are 53 conflicts between cellular carriers and PCS licensing opportunities under a 10 percent overlap rule. Of those opportunities, four would be opened up by raising the overlap cap to 20 percent. Another eight opportunities would be opened up by raising the overlap cap to 30 percent. And another opportunity would be opened up by raising the cap to 40 percent -- for a total of 13 additional BTA licensing opportunities.

| Company | BTA Names | Overlap 10-20 | Overlap 20-30 | Overlap 30-40 |
|-----------------------------|-----------------------------------|---------------|------------------------------|---------------|
| Sprint | Bloomington Fort Wayne | | 21.0 percent 20.0 percent | |
| Valley Cell. | Bloomington | 18.0 percent | | |
| W.K. Cellular | Danville | | 23.0 percent | |
| Indiana RSA #5 | Danville | | 23.0 percent | |
| Cell. of Indiana | Decatur | 13.0 percent | | |
| First Cell. of So. Illinois | Decatur | 13.0 percent | | |
| U.S. Cellular | Elkhart Fort Wayne Rockford | 13.0 percent | 29.0 percent | 31.0 percent |
| Century Cellunet | Elkhart | | 20.0 percent | |
| SWB | Kankakee | | 24.0 percent | |
| Illinois Valley Cellular | Kankakee | | 24.0 percent | |
| Ill. Indep. RSA #3 | Peoria | 17.0 percent | | |

Des Moines BTA Conflicts

Within the 13 BTAs that make up the Des Moines MTA, there are 51 conflicts between cellular carriers and PCS licensing opportunities under a 10 percent overlap rule. Of those opportunities, 14 would be opened up by raising the overlap cap to 20 percent. Another nine opportunities would be opened up by raising the overlap cap to 30 percent. And another opportunity would be opened up by raising the cap to 40 percent -- for a total of 24 additional BTA licensing opportunities.

| Company | BTA Names | Overlap 10-20 | Overlap 20-30 | Overlap 30-40 |
|----------------------------|--|------------------------------|------------------------------|---------------|
| Illinois Indep. RSA # 3 | Burlington | | 21.1 percent | |
| Iowa RSA 12 Part. | Dubuque Waterloo | 10.4 percent | 24.5 percent | |
| Iowa RSA 10 | Des Moines | 13.6 percent | | |
| Excellence II | Sioux City | | 25.0 percent | |
| Iowa East Cell. | Cedar Rapids | 14.6 percent | | |
| Plus Cellular | Dubuque | | 27.6 percent | |
| C-TEC | Des Moines Cedar Rapids Davenport | 13.8 percent 13.9 percent | 24.5 percent | |
| Contel | Dubuque | 12.5 percent | | |
| ELLERON Cell. | Dubuque | 10.4 percent | | |
| Cellular Ventures | Sioux City Fort Dodge | 11.2 percent 14.9 percent | | |
| CommNet Cellular Inc. | Des Moines Fort Dodge Iowa City Ottumwe | 11.4 percent 16.5 percent | 28.6 percent 27.3 percent | |
| General Cell. | Sioux City | 15.3 percent | | |

Los Angeles BTA Conflicts

Within the six BTAs that make up the Los Angeles MTA, there are 16 conflicts between cellular carriers and PCS licensing opportunities under a 10 percent overlap rule. Of those opportunities, two would be opened up by raising the overlap cap to 20 percent.

| Company | BTA Names | Overlap 10-20 | Overlap 20-30 | Overlap 30-40 |
|-----------------|-----------|---------------|---------------|---------------|
| Satellite Cell. | Las Vegas | 10.7 percent | | |
| Mohave Cell. | Las Vegas | 10.7 percent | | |

New York BTA Conflicts

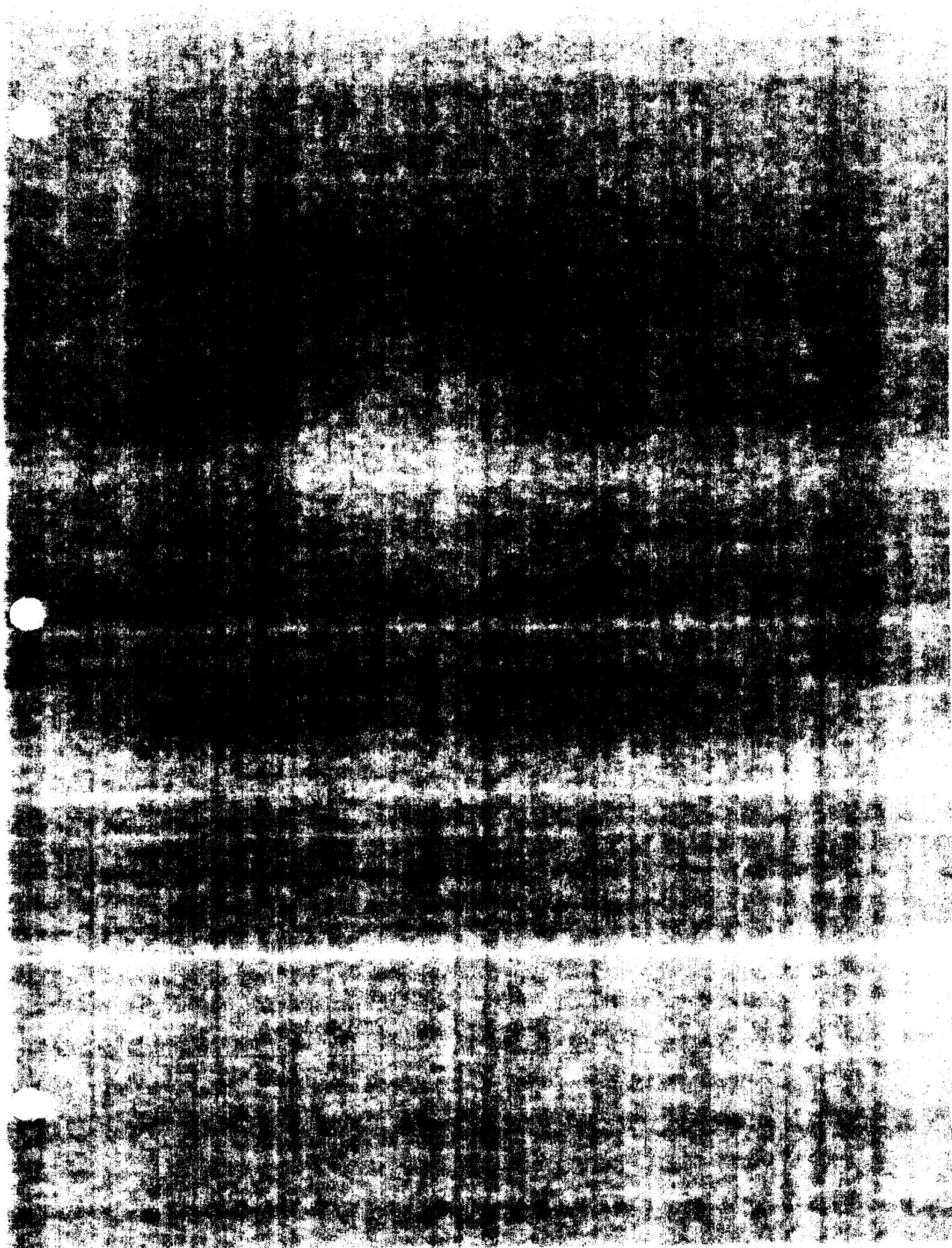
Within the 20 BTAs that make up the New York MTA, there are 46 conflicts between cellular carriers and PCS licensing opportunities under a 10 percent overlap rule. Of those opportunities, five would be opened up by raising the overlap cap to 20 percent. One more opportunity would be opened up by raising the overlap cap to 30 percent. And another three opportunities would be opened up by raising the cap to 40 percent -- for a total of nine additional BTA licensing opportunities.

| Company | BTA Names | Overlap 10-20 | Overlap 20-30 | Overlap 30-40 |
|-----------------|--------------|---------------|---------------|---------------|
| Sterling Cell. | Albany | 10.4 percent | | |
| FutureWave | Elmira | 19.6 percent | | |
| Americell | Elmira | 12.8 percent | | |
| New York RSA #4 | Syracuse | 16.4 percent | | |
| Pegasus Cell. | Syracuse | 16.4 percent | | |
| DICOMM | Elmira | | | 31.6 percent |
| Crowley | Elmira | | 29.9 percent | |
| Cellular One | Poughkeepsie | | | 38.6 percent |

Washington/Baltimore BTA Conflicts

Within the nine BTAs that make up the Washington/Baltimore MTA, there are 28 conflicts between cellular carriers and PCS licensing opportunities under a 10 percent overlap rule. Of those opportunities, seven would be opened up by raising the overlap cap to 20 percent. Another two opportunities would be opened up by raising the overlap cap to 30 percent. And another two opportunities would be opened up by raising the cap to 40 percent -- for a total of 11 additional BTA licensing opportunities.

| Company | BTA Names | Overlap 10-20 | Overlap 20-30 | Overlap 30-40 |
|-------------------------|---|------------------------------|---------------|---------------|
| Contel Cell. | Charlottesville | 11.5 percent | | |
| SWB | Charlottesville Cumberland Hagerstown | 17.7 percent 18.3 percent | 23.2 percent | |
| Sprint | Hagerstown | | | 36.1 percent |
| Bell. Atl. Mobile | Fredericksburg | | 26.7 percent | |
| CIS | Hagerstown | | | 36.1 percent |
| Northern Communications | Cumberland | 18.3 percent | | |



Top 50 BTA Service Profile

| BTA Name | Total Pop | Carriers In Market | Carriers Pop | % Overlap |
|------------------|------------|--|---|--|
| New York | 18,315,000 | LIN/McCaw NYNEX Mobile BAM Vanguard Comcast SNET Mobility Sussex Cell. Cell. One of Upstate NY | 15,554,700 16,766,000 1,664,000 328,900 1,531,200 805,600 137,100 72,600 | 85 % 91.5 % 9.1 % 1.8 % 8.4 % 4.4 % 0.7 % 0.4 % |
| Los Angeles | 15,866,000 | AirTouch BellSouth LIN/McCaw GTE/Contel General Cell. | 15,847,800 15,137,400 710,400 18,700 18,700 | 99.9 % 95.4 % 4.5 % 0.1 % 0.1 % |
| Chicago | 8,515,000 | SMB Mobile Ameritech Cell. Comcast GTE/Contel U.S. Cellular | 8,176,900 8,294,900 78,000 122,500 82,500 | 96 % 97.4 % 0.9 % 1.4 % 1.0 % |
| San Francisco | 6,830,000 | AirTouch/jv McCaw GTE Mobilnet GTE/Contel U.S. Cellular Cellular 2000 | 5,469,500 941,700 6,645,400 144,500 144,500 40,300 | 80.1 % 13.8 % 97.3 % 2.1 % 2.1 % 0.6 % |
| Philadelphia | 6,040,000 | BAM Comcast U.S. Cellular | 6,040,000 5,901,200 138,900 | 100 % 97.7 % 2.3 % |
| Detroit | 4,789,000 | AirTouch/CCI Ameritech Cell. Sprint Cell. Lake Huron Cell. Thumb Cell. | 4,747,600 4,610,100 137,500 41,100 41,100 | 99.1 % 96.3 % 2.9 % 0.9 % 0.9 % |
| Dallas-Ft. Worth | 4,766,000 | SMB Mobile LIN GTE Mobilnet McCaw Cell. Sprint Peoples Cell. Lone Star Cell. | 4,533,900 4,372,200 15,500 192,200 143,400 7,700 43,100 | 95.1 % 91.7 % 0.3 % 4.0 % 3.0 % 0.2 % 0.9 % |
| Wash., DC | 4,428,000 | SMB Mobile BAM GTE/Contel Shenandoah Mobile U.S. Cellular MCC Cellular Horizon | 4,116,300 4,256,200 125,400 6,800 39,300 145,600 165,800 | 92.9 % 96.1 % 2.8 % 0.15 % 0.9 % 3.3 % 3.7 % |
| Boston | 4,132,000 | NYNEX Mobile SMB Mobile Vanguard Starcellular | 4,022,400 4,022,400 110,000 110,000 | 97.3 % 97.3 % 2.7 % 2.7 % |
| Houston | 4,412,000 | GTE Mobilnet LIN/McCaw Meter Cell. Estex Cell. Texas 16 Cell. Tel. Alcee Comm's | 4,253,000 4,216,500 13,100 158,900 162,100 20,200 | 96.4 % 95.6 % 0.3 % 3.6 % 3.7 % 0.5 % |

| | | | | |
|-------------|-----------|---|---|---|
| Miami | 3,485,000 | Bellsouth McCaw GTE Mobilnet | 3,485,000 3,402,800 81,800 | 100 % 97.6 % 2.3 % |
| Atlanta | 3,592,000 | Bellsouth AirTouch U.S. Cellular InterCel Blackwater Cell. Other+ | 3,363,700 3,135,100 104,400 121,100 162,500 65,000 | 93.6 % 87.3 % 2.9 % 3.4 % 4.5 % 1.8 % |
| Cleveland | 2,948,000 | AirTouch/CCI GTE Mobilnet Cell Wave Sprint Cell. | 2,806,100 2,806,100 141,500 141,500 | 95.2 % 95.2 % 4.8 % 4.8 % |
| Minneapolis | 3,044,000 | McCaw U S WEST Pacific Telecom U.S. Cellular West Central Cell. LP Pacific MW Cell. Rural Cell. Corp. Cellular 7 Partnership Minnesota Southern Cell. Tel. Minnesota RSA 10 LP Century Cellnet | 2,624,600 2,624,600 15,200 34,500 34,500 42,000 125,300 54,700 82,600 82,600 83,300 | 86.2 % 86.2 % 0.5 % 1.1 % 1.1 % 1.4 % 4.1 % 1.8 % 2.7 % 2.7 % 2.7 % |
| St. Louis | 2,818,000 | SUB Mobile Ameritech Cell. LFB Inc. Rural Cell. Management First Cell. of S. Ill. U.S. Cellular | 2,749,500 2,665,700 20,800 34,700 34,700 48,600 | 97.6 % 94.6 % 0.7 % 1.2 % 1.2 % 1.7 % |
| Seattle | 2,951,000 | McCaw U S WEST San Juan Cell. LP | 2,951,000 2,777,600 259,500 | 100 % 94.1 % 8.8 % |
| San Diego | 2,732,000 | U S WEST AirTouch | 2,732,000 2,732,000 | 100 % 100 % |
| Pittsburgh | 2,496,000 | BAN McCaw Horizon Cell. Sprint U.S. RSA Telco Partners | 2,263,600 2,079,400 232,200 158,400 184,200 | 90.7 % 83.3 % 9.3 % 6.3 % 7.3 % |
| Phoenix | 2,662,000 | BAN U S WEST Gila River Cell. Genl. Partnership SE Arizona LP Jaybar Comm'n | 2,526,100 2,356,800 169,300 37,300 37,300 | 94.9 % 88.5 % 6.4 % 1.4 % 1.4 % |
| Baltimore | 2,534,000 | BAN SUB Mobile MCC Cellular | 2,534,000 2,445,800 88,000 | 100 % 96.5 % 3.5 % |
| Tampa | 2,404,000 | McCaw GTE Mobilnet Indep. Cell. Network Ten-Ten Genl. Partnership Other+ | 2,306,800 2,328,100 21,300 75,500 75,500 | 96 % 96.8 % 0.9 % 3.1 % 3.1 % |

| | | | | |
|-------------|-----------|---|--|--|
| Denver | 2,282,000 | McCaw U S WEST Alfred DiRico Comnet Cell. Union Cell. Celludyne Member Market 352 CO | 2,119,800 2,119,800 61,500 150,700 36,400 27,400 25,400 | 92.9 % 92.9 % 2.7 % 6.6 % 1.6 % 1.2 % 1.1 % |
| Cincinnati | 2,083,000 | AirTouch/CCI Ameritech Cell. Danbury GTE/Contel Florida Metro SE Indiana Cell. Telco. GTE Mobilnet BellSouth | 1,959,800 1,996,400 25,300 76,100 21,500 39,500 21,500 61,900 | 94.1 % 95.8 % 1.2 % 3.7 % 1.0 % 1.9 % 1.0 % 2.9 % |
| Kansas City | 1,934,000 | AirTouch/McCaw SMB Mobile U.S. Cellular Sterling Cell. Liberty Cell. Ameritech Cell. ALLTEL Mid-Missouri Cellular | 1,526,100 1,683,100 129,200 121,600 151,400 99,400 109,700 99,400 | 78.9 % 87.0 % 6.7 % 6.3 % 7.8 % 5.1 % 5.7 % 5.1 % |
| Milwaukee | 1,806,000 | BellSouth Ameritech Cell. Pacific Telecom | 1,806,000 1,727,000 79,200 | 100 % 95.6 % 4.3 % |
| Portland | 1,855,000 | Pacific NW Cell. McCaw GTE Mobilnet Fibercom Oregon RSA 3 Cook County Point RSA 2 RSA 4 Crystal | 43,000 1,591,200 1,753,500 8,100 8,100 7,000 43,000 43,100 43,000 172,300 | 2.3 % 83.8 % 94.5 % 0.4 % 0.4 % 0.4 % 2.3 % 2.3 % 2.3 % 9.3 % |
| Sacramento | 1,886,000 | U.S. Cellular McCaw AirTouch Modoc Cellular Pacific Sierra Cellular Atlantic Cell. Data Cell | 50,900 1,591,200 1,648,000 50,900 35,900 151,000 151,000 93,000 | 2.7 % 84.4 % 87.4 % 2.7 % 1.9 % 8.0 % 8.0 % 4.9 % |
| Charlotte | 1,798,000 | BAN ALLTEL Mobile U.S. Cellular Bravo Other 1 Other 2 Sprint Cell | 1,151,300 1,205,900 200,700 376,700 200,700 376,700 45,400 | 64. % 61.5 % 11.2 % 20.9 % 11.2 % 20.9 % 2.5 % |
| Norfolk | 1,737,000 | SMB Mobile Sprint Cell. GTE/Contel U.S. Cellular BAN | 45,300 1,662,700 1,579,500 96,500 32,300 | 2.6 % 95.7 % 90.9 % 5.6 % 1.9 % |
| San Antonio | 1,665,000 | Kent S. Foster McCaw Tx RSA 15 LP SMB Mobile GTE/Contel U.S. Cellular TX 16 Cell. Tel. | 74,000 1,417,800 74,000 1,573,800 17,600 156,000 17,600 | 4.4 % 85.2 % 4.4 % 94.5 % 1.1 % 9.4 % 1.1 % |

| | | | | |
|----------------|-----------|---|---|--|
| Providence | 1,524,000 | BAN NYNEX | 1,524,000 1,524,000 | 100 % 100 % |
| Columbus | 1,573,000 | GTE Mobile AirTouch/CCI Ameritech/ Sterling Minford Sprint Cell. Celluave | 1,333,300 1,361,700 28,400 27,000 27,000 186,500 186,500 | 84.8 % 86.6 % 1.8 % 1.7 % 1.7 % 11.7 % 11.7 % |
| Nashville | 1,532,000 | GTE/Contel U.S. Cellular BellSouth Nexus Cell. LP Tenn. RSA #3 LP Advantage Cell. Ten Woodland Rd. Corp. | 1,320,000 156,300 1,195,600 122,800 29,700 122,800 61,600 | 86.2 % 10.2 % 78.0 % 8.0 % 1.9 % 8.0 % 4.0 % |
| Memphis | 1,448,000 | GTE/Contel BellSouth RBD Cellular Cellular Holding Sterling ALLTEL Mercury Cellular Mississippi 6 Cell. | 1,124,400 1,240,700 7,700 121,000 85,700 85,700 168,000 12,000 | 77.7 % 85.7 % 0.5 % 8.4 % 5.9 % 5.9 % 11.6 % 0.8 % |
| New Orleans | 1,406,000 | Radiofone BellSouth Mobiletel Cellular Holding RSA Cell. Corp. Cellular XL Louisiana 8 Corp. | 1,214,600 1,256,600 108,800 40,700 42,000 40,700 108,000 | 86.4 % 89.4 % 7.7 % 2.9 % 2.9 % 2.9 % 7.7 % |
| Louisville | 1,412,000 | GTE/Contel BellSouth Horizon Cell. U.S. Cellular Bluegrass Cell. SE Indiana Cell. Alpha Cellular Ameritech | 1,083,100 952,900 210,800 66,700 309,000 53,100 67,500 9,600 | 76.7 % 67.5 % 14.9 % 4.7 % 21.9 % 3.8 % 4.8 % 0.7 % |
| Indianapolis | 1,401,000 | BellSouth GTE Mobilnet SE Indiana Cell. Indiana 5 RSA LP Florida Metro | 1,358,300 1,348,000 32,300 32,300 18,000 | 96.9 % 97.7 % 2.3 % 2.3 % 1.3 % |
| Salt Lake City | 1,428,000 | U S WEST McCaw CommNet Cell. Union Cellular American Rural Cell. AirTouch Omega Cell. Part. | 1,263,000 1,238,700 82,100 29,400 66,500 9,400 24,600 | 88.5 % 86.7 % 5.7 % 1.7 % 4.7 % 0.7 % 1.7 % |
| Oklahoma City | 1,346,000 | McCaw SMB Mobile U.S. Cellular Dobson Cell. SU Oklahoma Cell. Systems Sooner Cellular Enfd Cellular | 1,095,700 1,063,200 73,900 119,900 9,900 120,700 49,700 | 81.4 % 78.9 % 5.5 % 8.9 % 0.7 % 8.9 % 3.7 % |
| Orlando | 1,423,000 | McCaw BellSouth ALLTEL Mobile | 1,423,300 1,389,600 33,800 | 100 % 97.6 % 2.4 % |

| | | | | |
|------------------|-----------|--|--|--|
| Greensboro, NC | 1,299,000 | GTE Mobilnet Sprint Cell. BAM ALLTEL Clear Comm. U.S. Cellular Carolina West Blue Ridge Cellular | 962,300 1,080,700 23,200 23,200 157,200 88,300 195,500 38,300 | 74.1 % 83.2 % 1.8 % 1.8 % 12.1 % 6.8 % 15.1 % 2.9 % |
| Buffalo | 1,231,000 | Rochester/NYNEX Associated/SWB DICONN GTE/Contel | 1,187,400 1,187,400 43,600 43,600 | 96.5 % 96.5 % 3.5 % 3.5 % |
| Dayton | 1,246,000 | AirTouch/CCI Ameritech Cell. | 1,246,000 1,246,000 | 100 % 100 % |
| Birmingham | 1,245,000 | BellSouth GTE/Contel S. Alabama Cell. ALLTEL Dominion Cell. Oneonta | 1,029,200 902,600 52,000 51,500 52,000 41,000 | 82.7 % 72.5 % 4.2 % 4.1 % 4.2 % 3.3 % |
| Jacksonville, FL | 1,229,000 | McCaw BellSouth ALLTEL Mobile Sterling Cell. U.S. Cellular Larsen Cell. | 1,019,300 1,019,300 170,800 39,200 123,100 86,900 | 82.9 % 82.9 % 13.9 % 3.2 % 10.0 % 7.1 % |
| Hartford, CT | 1,115,000 | BAM SNET Mobility | 1,115,200 1,115,200 | 100 % 100 % |
| Rochester, NY | 1,142,000 | Associated/SWB Rochester/NYNEX DICONN GTE/Contel NY RSA #4 LP Pegasus Cell. | 1,023,500 1,023,500 61,100 61,100 57,100 57,100 | 89.6 % 89.6 % 5.4 % 5.4 % 5.0 % 5.0 % |
| Raleigh-Durham | 1,203,000 | Sprint Cell. GTE Mobilnet U.S. Cellular | 1,202,500 787,500 415,000 | 100 % 65.5 % 34.5 % |
| Richmond | 1,155,000 | GTE/Contel BellSouth Sprint Cell. SWB Mobile BAM U.S. Cellular | 1,121,200 791,000 227,300 87,000 44,000 37,200 | 97.1 % 68.5 % 19.7 % 7.6 % 3.8 % 3.2 % |
| Albany | 1,056,000 | Associated NYNEX Cellular One of Upstate NY Adirondack Cellular Tel. Sterling Cellular Hudson Valley RSA Cell. Pt. GTE/Contel | 853,600 887,400 33,800 58,500 58,500 109,800 109,800 58,500 | 80.8 % 84 % 3.2 % 5.5 % 5.5 % 10.4 % 10.4 % 5.5 % |

§ Pops do not include share of joint venture ("jv"), which would raise figure to approximately 6.3 million attributable pops in San Francisco BTA, an overlap of roughly 92.6 percent.

+ Other refers to small split markets operated by small providers, not members of CTIA's Small Operator Caucus.