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OCT 4 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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October 4, 1994

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 and Submission
PR Docket No. 93-61

Dear Mr. Caton:

On October 3, 1994, Wayne Watts, Jonathan Riso, Keith Rainer and undersigned counsel on behalf of Southwestern Bell Mobile Systems ("SBMS") met with Chairman Reed Hundt and his Senior Legal Advisor, Ruth Milkman to discuss the attached material pertaining to outstanding issues in the above-referenced proceeding.

In addition, the same individuals on behalf of SBMS met on October 3 concerning the same subjects with Lauren Belvin, Senior Legal Advisor to Commissioner Quello; James Coltharp, Special Advisor to Commissioner Barrett; David Siddall, Legal Advisor to Commissioner Ness; Ron Netro, Engineering Assistant to the Chief of the Private Radio Bureau and Martin Leibman, Deputy Chief of the Rules Branch of the Private Radio Bureau's Land Mobile and Microwave Division.

At the above meetings there was also discussion about the possibility of dividing the spectrum ultimately allocated for wideband AVM/LMS into six or more 2 MHz blocks, subjecting such blocks to competitive bidding and permitting aggregation of multiple blocks of 2 MHz by winning bidders.

Two copies of this notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commissions Rules.

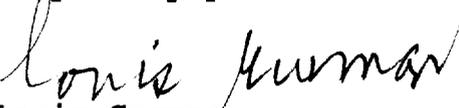
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William F. Caton, Acting Secretary
October 4, 1994
Page 2

Please stamp and return the provided copy to confirm your receipt.

Very truly yours,



Louis Gurman

Enclosures

cc: Chairman Hundt
Ruth Milkman
Lauren J. Belvin
James R. Coltharp
David R. Siddall
Jill Lockett
Ralph A. Haller
Rosalind K. Allen
F. Ronald Netro
Martin D. Liebman
Edward R. Jacobs
Richard B. Engelman

AVM/LMS NPRM

Comments on Proposed Rule Making

October 3, 1994

Outline

- ◆ Transition Period
- ◆ Band Plan
- ◆ Auction
- ◆ Voice Services

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*.

Transition Period (cont.)

- ◆ Hundreds of prime licenses would not expire for years.
- ◆ Until licenses expire, spectrum value is reduced.
- ◆ **Teletrac has filed 116 applications for new facilities since the petition for a rulemaking, including 14 since their request for a “freeze.”**

Band Plan

- ◆ “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.)

“Increasing the bandwidth from 4 MHz to 8 MHz will increase capacity by only about 40% (whereas capacity could be doubled by operating two systems on separate 4 MHz bands).”

Dr. Jay E. Padgett

Chairman, TIA Mobile & Personal Communications
Consumer Radio Section

*Analysis of Teletrac Receiver Performance and
Part 15 Interference*, page ii.

Band Plan (cont.)

- ◆ There should be more than two wideband AVM/LMS bands per area. Having only two:
 - **discourages** new service providers nationwide.
 - **restricts competition** within each area.
 - requires **removing** one or more licensed and **built systems** 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.
- ◆ Prefer licensing MSAs and RSAs.
 - BTAs are workable if build out rules are appropriate.

Auction

- ◆ **Grandfathered licenses devalue spectrum.**
- ◆ 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.