

EX PARTE OR LATE FILED



Building The
Wireless Future™

CTIA

Cellular
Telecommunications
Industry Association
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Washington, D.C. 20036
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October 6, 1994

RECEIVED

OCT 6 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

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

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

On Thursday, October 6, 1994, Mr. Randall S. Coleman, Vice President of Regulatory Policy and Law, Cellular Telecommunications Industry Association (CTIA), sent the attached letters to the following Commission personnel:

Chairman Reed Hundt	Ms. Karen Brinkmann
Commissioner Andrew C. Barrett	Mr. James Coltharp
	Ms. Lisa B. Smith
Commissioner Rachelle B. Chong	Ms. Jill Luckett
Commissioner Susan Ness	Mr. David Siddall
Commissioner James H. Quello	Ms. Lauren Belvin
	Mr. Rudolfo Baca
Mr. Blair Levin	Mr. William Kennard
Dr. Robert Pepper	Mr. Donald Gips
Mr. Gregory Rosston	Mr. Andrew Sinwell
Mr. Anthony Williams	Mr. Michael Wack
Mr. Stanley Wiggins	

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and the attachments are being filed with your office.

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

Sincerely,


Robert F. Roche

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



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Randall S. Coleman
Vice President for
Regulatory Policy and Law

October 6, 1994

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, NW - Room 814
Washington, DC 20554

Re: Amendment of the Commission's Rules to
Establish New Personal Communications Services,
GEN Docket No. 90-314

Dear Chairman Hundt:

On behalf on CTIA, I call your attention to the attached population overlap analysis of four additional Major Trading Areas (MTAs) and their component Basic Trading Areas (BTAs) provided in response to the request of the Office of Plans and Policy. In prior submissions, CTIA provided similar analyses of nine MTAs and 80 BTAs, including the top 50 BTAs.¹

These submissions illustrate the unnecessarily restrictive effect of the Commission's current ten percent overlap limit on cellular eligibility and provide additional grounds for granting CTIA's Petition for Further Reconsideration in this proceeding. In its petition, CTIA points out that increasing the permissible overlap to as much as 40 percent would not harm competition in the wireless marketplace.² The overlap analyses contained in CTIA's *ex parte* submissions show that a larger overlap limit would create a small number of new bidding opportunities for cellular licensees. Moreover, where such new opportunities are created, small and medium-sized cellular companies are the beneficiaries. Larger cellular companies, which tend to have large service territories, typically have overlap percentages above 40 percent.

¹ See *ex parte* letter from Robert F. Roche, CTIA, to William F. Caton, FCC, concerning GEN Docket No. 90-314, filed August 2, 1994 (containing *ex parte* letters from Randall S. Coleman, CTIA, to Donald M. Gips and Byron F. Marchant, FCC, filed August 2, 1994; *ex parte* letter from Robert F. Roche to Byron F. Marchant, filed June 6, 1994).

² Petition for Further Reconsideration of the Cellular Telecommunications Industry Association, filed July 25, 1994, at 1-6.



CTIA also explained that the Commission need not to restrict the post-auction divestiture option to cellular licensees with overlaps between ten percent and 20 percent.

As the degree of overlap increases, the adverse consequences of attempting to 'game the system' (by attempting to force bidding to a high level without actually winning) and thus the incentive not to do so, increase. For example, a cellular provider with a 40% overlap could attempt to abuse the system only by taking the risk of making the winning bid and being forced to quickly divest a large portion of its cellular holdings.³

Thus, broadening the availability of the post-auction divestiture option to cellular licensees with overlaps as high as 40 percent would create no harm to the auction process. In fact, bidding competition would be increased by allowing more small and medium-sized cellular companies to participate.

Finally, CTIA's overlap studies support the pre-auction divestiture mechanism recently proposed by Ameritech.⁴ Replying to comments on petitions for further reconsideration in this docket, Ameritech urges the Commission to permit pre-auction divestiture of cellular interests exceeding the existing 20 percent overlap ceiling applicable to the post-auction divestiture option. Under this proposal, a cellular company could transfer overlapping interest in excess of 20 percent to an interim independent trustee who would dispose of the interest if the cellular company wins in the auction.

With this approach, the adverse consequences of attempting to game the system are even higher. A cellular licensee with a 60 percent overlap would have to transfer 40 percent of its interest to qualify to bid on a 30 MHz license, with the risk of having to divest another ten percent should it succeed in the auction. This pre-auction mechanism, working in tandem with the current post-auction divestiture option, will result in broader cellular participation in PCS, while ensuring a post-auction marketplace that is consistent with the Commission's rules.

CTIA respectfully requests that these proposals be incorporated into the Commission's PCS rules.

Sincerely,

Randall S. Coleman

³ *Id.* at 8.

⁴ Reply of Ameritech, filed September 14, 1994



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Randall S. Coleman
Vice President for
Regulatory Policy and Law

October 6, 1994

The Honorable James H. Quello
Commissioner
Federal Communications Commission
1919 M Street, NW - Room 802
Washington, DC 20554

Re: Amendment of the Commission's Rules to Establish
New Personal Communications Services
GEN Docket No. 90-314

Dear Commissioner Quello:

On behalf on CTIA, I call your attention to the attached population overlap analysis of four additional Major Trading Areas (MTAs) and their component Basic Trading Areas (BTAs) provided in response to the request of the Office of Plans and Policy. In prior submissions, CTIA provided similar analyses of nine MTAs and 80 BTAs, including the top 50 BTAs.¹

These submissions illustrate the unnecessarily restrictive effect of the Commission's current ten percent overlap limit on cellular eligibility and provide additional grounds for granting CTIA's Petition for Further Reconsideration in this proceeding. In its petition, CTIA points out that increasing the permissible overlap to as much as 40 percent would not harm competition in the wireless marketplace.² The overlap analyses contained in CTIA's *ex parte* submissions show that a larger overlap limit would create a small number of new bidding opportunities for cellular licensees. Moreover, where such new opportunities are created, small and medium-sized cellular companies are the beneficiaries. Larger cellular companies, which tend to have large service territories, typically have overlap percentages above 40 percent.

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With this approach, the adverse consequences of attempting to game the system are even higher. A cellular licensee with a 60 percent overlap would have to transfer 40 percent of its interest to qualify to bid on a 30 MHz license, with the risk of having to divest another ten percent should it succeed in the auction. This pre-auction mechanism, working in tandem with the current post-auction divestiture option, will result in broader cellular participation in PCS, while ensuring a post-auction marketplace that is consistent with the Commission's rules.

CTIA respectfully requests that these proposals be incorporated into the Commission's PCS rules.

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Randall S. Coleman
Vice President for
Regulatory Policy and Law

October 6, 1994

The Honorable Andrew C. Barrett
Commissioner
Federal Communications Commission
1919 M Street, NW - Room 826
Washington, D.C. 20554

Re: Amendment of the Commission's Rules to
Establish New Personal Communications Services,
GEN Docket No. 90-314

Dear Commissioner Barrett:

On behalf on CTIA, I call your attention to the attached population overlap analysis of four additional Major Trading Areas (MTAs) and their component Basic Trading Areas (BTAs) provided in response to the request of the Office of Plans and Policy. In prior submissions, CTIA provided similar analyses of nine MTAs and 80 BTAs, including the top 50 BTAs.¹

These submissions illustrate the unnecessarily restrictive effect of the Commission's current ten percent overlap limit on cellular eligibility and provide additional grounds for granting CTIA's Petition for Further Reconsideration in this proceeding. In its petition, CTIA points out that increasing the permissible overlap to as much as 40 percent would not harm competition in the wireless marketplace.² The overlap analyses contained in CTIA's *ex parte* submissions show that a larger overlap limit would create a small number of new bidding opportunities for cellular licensees. Moreover, where such new opportunities are created, small and medium-sized cellular companies are the beneficiaries. Larger cellular companies, which tend to have large service territories, typically have overlap percentages above 40 percent.

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CTIA respectfully requests that these proposals be incorporated into the Commission's PCS rules.

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Randall S. Coleman

³ *Id.* at 8.

⁴ Reply of Ameritech, filed September 14, 1994



**Building The
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October 6, 1994

The Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, NW - Room 844
Washington, DC 20554

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Re: Amendment of the Commission's Rules to
Establish New Personal Communications Services,
GEN Docket No. 90-314

Randall S. Coleman
Vice President for
Regulatory Policy and Law

Dear Commissioner Chong:

On behalf on CTIA, I call your attention to the attached population overlap analysis of four additional Major Trading Areas (MTAs) and their component Basic Trading Areas (BTAs) provided in response to the request of the Office of Plans and Policy. In prior submissions, CTIA provided similar analyses of nine MTAs and 80 BTAs, including the top 50 BTAs.¹

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Randall S. Coleman
Vice President for
Regulatory Policy and Law

October 6, 1994

The Honorable Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, NW - Room 832
Washington, DC 20554

Re: Amendment of the Commission's Rules to
Establish New Personal Communications Services
GEN Docket No. 90-314.

Dear Commissioner Ness:

On behalf of CTIA, I call your attention to the attached population overlap analysis of four additional Major Trading Areas (MTAs) and their component Basic Trading Areas (BTAs) provided in response to the request of the Office of Plans and Policy. In prior submissions, CTIA provided similar analyses of nine MTAs and 80 BTAs, including the top 50 BTAs.¹

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October 6, 1994

Mr. Greg Rosston
Office of Plans & Policy
Federal Communications Commission
1919 M Street, N.W. - Room 822
Washington, D.C. 20554

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

Dear Greg:

In response to your request for further information and analysis of four Major Trading Areas (MTAs) and their component Basic Trading Areas (BTAs), I attach two matrices demonstrating the extent to which the current ten percent overlap threshold excludes small and mid-sized cellular companies from full participation in providing Personal Communications Services (PCS).

The four MTAs you selected -- Knoxville, Omaha, Philadelphia and San Francisco -- are composed of 34 BTAs with a total population of 25,692,300. These BTAs, in turn, overlap with 73 cellular service areas. The attached matrices demonstrate that raising the overlap threshold from ten to 20 percent would create seven new opportunities in BTAs for six small or mid-sized companies, including: Bachtel Cellular, Cellular 2000, General Cellular, Pinellas, Sierra Cellular, and the Tennessee RSA 3 L.P.

Raising the threshold to 25 percent would create a further nine opportunities for small or mid-sized cellular companies (for a total of 16 opportunities foreclosed by the current ten percent overlap rule), including: AmeriCell, Cal-One Cellular, General Cellular, Liberty Cellular, Mountaineer Cellular, Miscelco, Nebraska Cellular and Tennessee RSA 3 L.P.

Raising the threshold to 30 percent would create a further three opportunities for small or mid-sized cellular companies (for a total of 19 opportunities foreclosed by the current ten percent overlap rule), including: General Cellular, Independent Cellular Network, and Nebraska Cellular.



Raising the threshold for full cellular eligibility in PCS licensing would not diminish competition in the wireless marketplace -- either pre- or post-auction. In these 34 BTAs, with their four BTA-based licenses and two MTA-based licenses, a total of 204 licenses will be auctioned. Modification of the threshold will create, at most, nineteen additional opportunities for small and mid-sized cellular companies to bid for more than 10 MHz of PCS spectrum.

Beyond the issue of the appropriate overlap threshold governing cellular eligibility, the Commission has created an entirely unnecessary and prejudicially narrow divestiture window (permitting only cellular companies with overlap interests between ten and 20 percent to divest their cellular and thereby be eligible to bid for more than 10 MHz of PCS spectrum). CTIA submits that this further barrier to cellular participation in PCS is entirely unnecessary, and predicated on little more than tenuous guesswork as to when ownership interests may impede competition.

Indeed, there is a simple solution to the Commission's attempts to identify a precise balance point at which ownership interests may or may not be perceived to impede competition in the marketplace. Like Alexander and the Gordian knot, the Commission may cut through the tangle of contradictory argument and problematic evidence with a simple blow. The Reply of Ameritech to the Comments on the Petitions for Further Reconsideration in GEN Docket No. 90-314, filed September 14, 1994, provides a simple and fair mechanism which will permit cellular companies to participate in PCS without harm to the auction process, to wireless competition, or to the public.

The proposal that pre-auction divestiture to an interim independent trustee will permit greater participation in the PCS auctions, and ensure that such bidding does not produce a post-divestiture environment in which less competition exists in the wireless marketplace.

If you have any questions about the foregoing, please do not hesitate to contact the undersigned.

Sincerely,

Robert F. Roche
Director for Research

Attachments

Additional BTA Service Profiles

BTA Name	Total Pops	Celcos in Market	Celco Pops	% Overlap
Kingsport, TN	663,300	GTE/Contel Sprint BAM Bachtel SWB Mobile	447,800 663,300 112,300 57,200 32,100	67.5 % 100 % 16.9 % 8.6 % 4.8 %
Knoxville, TN	995,800	Bachtel Sprint Tennessee RSA 3 LP GTE/Contel U.S. Cellular	191,600 51,000 165,100 804,100 765,000	19.2 % 5.1 % 16.6 % 80.7 % 76.8 %
Middlesboro-Harlan, KY	119,900	First Kentucky Metro Mobile CTS Tennessee RSA 3 LP GTE/Contel Mountaineer Cell.	65,500 26,700 27,700 93,200 26,700	54.6 % 22.3 % 23.1 % 77.7 % 22.3 %
Grand Island-Kearney, NE	143,800	General Cellular Nebraska Cellular	131,700 143,800	91.6 % 100 %
Hastings, NE	72,800	General Cellular Nebraska Cellular	72,800 72,800	100 % 100 %
Lincoln, NE	321,300	General Cellular Nebraska Cellular Centennial Cell. Lincoln Cell.	95,800 95,800 225,600 225,600	29.8 % 29.8 % 70.2 % 70.2 %
McCook, NE	35,400	General Cellular Nebraska Cellular Miscelco Liberty Cellular	28,300 28,300 7,100 7,100	79.9 % 79.9 % 20.1 % 20.1 %
Norfolk, NE	111,900	National Cellular Nebraska Cellular General Cellular Pinellas	83,900 111,900 21,400 6,600	74.9 % 100 % 19.1 % 5.9 %
North Platte, NE	81,200	General Cellular Nebraska Cellular Sagir	79,000 81,200 2,200	97.3 % 100 % 2.7 %
Omaha, NE	939,000	National Cellular Nebraska Cellular General Cellular U.S. Cellular RSA 7 LP Pinellas U S WEST NewVector Lincoln CommNet Cellular	17,500 196,200 99,100 64,800 14,900 124,300 633,500 683,400 44,700	1.9 % 20.9 % 10.6 % 6.9 % 1.6 % 13.2 % 67.5 % 72.8 % 4.8 %
Atlantic City, NJ	333,700	BAM Ellis Thompson	333,700 333,700	100 % 100 %
Dover, DE	270,200	MCC Cellular BAM First Cellular LP	28,200 270,200 242,000	10.4 % 100 % 89.6 %
Harrisburg, PA	680,200	Vanguard Cellular Sprint Cellular	680,200 633,300	100 % 93.2 %
Lancaster, PA	453,400	Vanguard Cellular Sprint Cellular	453,400 453,400	100 % 100 %

Phila., PA- Wilmington, DE	6,040,200	Comcast BAM U.S. Cellular	5,901,300 6,040,200 138,900	97.7 % 100 % 2.3 %
Pottsville- Frackville, PA	151,000	Sunshine Cellular U.S. Cellular	151,000 151,000	100 % 100 %
Reading, PA	351,700	Vanguard Cellular BAM	351,700 351,700	100 % 100 %
State College, PA	128,100	Vanguard Cellular Independent Cellular Network	128,100 128,100	100 % 100 %
Sunbury- Shamokin, PA	188,900	Sunshine Cellular U.S. Cellular BAM	188,900 18,100 170,800	100 % 9.6 % 90.4 %
Williamsport, PA	165,200	AmeriCell Independent Cellular Network Vanguard Cellular U.S. Cellular	36,800 42,900 122,300 122,300	22.3 % 25.9 % 74.0 % 74.0 %
York-Hanover, PA	442,300	Vanguard Cellular Sprint	442,300 442,300	100 % 100 %
Chico- Oroville, CA	228,800	General Cellular AirTouch AT&T Wireless Services (McCaw)	202,100 228,800 26,700	88.3 % 100 % 11.7 %
Eureka, CA	157,200	U.S. Cellular Cal-One Cellular	157,200 157,200	100 % 100 %
Fresno, CA	872,200	GTE/Contel Cellular 2000 AT&T Wireless Services (McCaw)	872,200 104,800 767,500	100 % 12.0 % 88.0 %
Mercen, CA	218,800	Sierra Cellular Cellular 2000 GTE/Contel AT&T Wireless Services (McCaw)	16,700 202,100 202,100 16,700	7.6 % 92.4 % 92.4 % 7.6 %
Modesto, CA	484,200	AirTouch Sierra Cellular AT&T Wireless Services (McCaw)	428,900 55,300 484,200	88.6 % 11.4 % 100 %
Redding, CA	285,500	AirTouch U.S. Cellular Cal-One Cellular AT&T Wireless Services (McCaw)	226,200 59,300 59,300 226,200	79.2 % 20.8 % 20.8 % 79.2 %
Reno, NV	482,400	Sierra Cellular AirTouch C.C. Cellular General Cellular ALLTEL Cellular AT&T Wireless Services (McCaw) GTE/Contel	1,300 382,400 40,300 105,400 48,400 377,200 10,200	0.3 % 79.3 % 8.4 % 21.8 % 10.0 % 79.2 % 2.1 %
Sacramento, CA	1,886,100	U.S. Cellular AT&T Wireless Services (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 %

Salinas- Monterey, CA	384,200	GTE/Contel AT&T Wireless Services (McCaw)	384,200 384,200	100 % 100 %
San Fran.- Oak.-S.J., CA	6,830,200	AirTouch GTE/Contel U.S. Cellular Cellular 2000 AT&T Wireless Services (McCaw) ^a Cellular One-Santa Cruz	5,469,400 6,830,200 144,500 40,300 a941,700 234,200	80.1 % 100 % 2.1 % 0.6 % a13.8 % 3.4 %
Stockton, CA	568,400	Sierra Cellular AirTouch AT&T Wireless Services (McCaw)	38,800 529,600 568,400	6.8 % 93.2 % 100 %
Visalia- Porterville, CA	466,700	GTE/Contel AT&T Wireless Services (McCaw)	466,700 466,700	100 % 100 %
Yuba City- Marysville, CA	138,800	AirTouch AT&T Wireless Services (McCaw)	138,800 138,800	100 % 100 %

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

Additional Major Trading Area Service Profiles

MTA Name	Total Pops	Celcos in Market	Celco Pops	% Overlap
Knoxville MTA	1,779,000	GTE/Contel	1,345,100	75.6 %
		Sprint	714,300	40.2 %
		BAM ^a	112,300	6.3 %
		Bachtel	248,800	13.9 %
		SWB Mobile	32,100	1.8 %
		Tennessee RSA 3 LP	129,800	7.3 %
		U.S. Cellular	765,000	43 %
		First Kentucky	65,500	3.7 %
		Metro Mobile CTS ^a	26,700	1.5 %
		Mountaineer Cell.	26,700	1.5 %
Omaha MTA	1,705,300	General Cellular	528,100	30.9 %
		Nebraska Cellular	730,000	42.8 %
		Centennial Cellular	225,600	13.2 %
		Lincoln	909,000	53.3 %
		Miscellco	7,100	0.4 %
		Liberty Cellular	7,100	0.4 %
		National Cellular	17,500	1.0 %
		Pinellas	130,900	7.7 %
		Sagir	2,200	0.1 %
		U S WEST NewVector	633,500	37.1 %
		RSA 7 L.P.	14,900	0.9 %
		U.S. Cellular	64,800	3.8 %
		CommNet Cellular	44,700	2.6 %
Philadelphia MTA	9,204,600	BAM	7,166,600	77.9 %
		Ellis Thompson	333,700	3.6 %
		WCC Cellular	28,200	0.3 %
		First Cellular L.P.	242,000	2.6 %
		Vanguard Cellular	2,178,000	23.7 %
		Sprint	1,529,000	16.6 %
		Comcast	5,901,300	64.1 %
		Sunshine Cellular	339,900	3.7 %
		U.S. Cellular	430,300	4.7 %
		Independent Cellular Network	171,000	1.9 %
AmeriCell	36,800	0.4 %		
San Francisco MTA	13,003,400	General Cellular	307,500	2.4 %
		AirTouch	9,052,100	69.6 %
		AT&T Wireless Services (McCaw)	5,989,500	46.1 %
		U.S. Cellular	411,900	3.2 %
		Cal-One Cellular	216,500	1.7 %
		GTE/Contel	8,765,600	67.4 %
		Cellular 2000	347,200	2.7 %
		Sierra Cellular	263,000	2.0 %
		C.C. Cellular	40,300	0.3 %
		ALLTEL	48,400	0.4 %
		Modoc	50,900	0.4 %
		Cellular Pacific	35,900	0.3 %
		Atlantic Cellular	151,000	1.2 %
Data Cellular	93,000	0.7 %		
Cellular One-Santa Cruz	234,200	1.8 %		

^aAffiliated companies. Aggregation of pops will have no impact on eligibility, regardless of overlap threshold.