

RECEIVED

JAN 20 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of )

Revision of Part 22 of the )  
Commission's Rules Governing the )  
Public Mobile Services )

CC Docket No. 92-115

Amendment of Part 22 of the )  
Commission's Rules to Delete )  
Section 22.119 and Permit the )  
Concurrent Use of Transmitters )  
in Common Carrier and Non-Common )  
Carrier Service )

CC Docket No. 94-46  
RM-8367

DOCKET FILE COPY ORIGINAL

OPPOSITION/COMMENTS TO PETITIONS FOR RECONSIDERATION OF  
THE CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION

Andrea D. Williams  
Staff Counsel

Michael F. Altschul  
Vice President, General Counsel

Randall S. Coleman  
Vice President, Regulatory Policy and Law

CELLULAR TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION

1250 Connecticut Avenue, N.W., Suite 200  
Washington, D.C. 20036

January 20, 1995

**TABLE OF CONTENTS**

**SUMMARY . . . . . i**

**BACKGROUND . . . . . 1**

**I. THE ADOPTION OF SECTION 22.919 DOES NOT RESULT IN  
ADDITIONAL REPAIR COSTS, INCREASED CUSTOMER  
INCONVENIENCE OR INTERFERES WITH A MANUFACTURER'S  
ABILITY TO PROVIDE REPAIR SERVICE AND SERVICE UPGRADES. . . . . 4**

**II. THE COMMISSION'S NEW ESN RULE IS A CRITICAL AND  
NECESSARY TOOL IN COMBATING CELLULAR FRAUD. . . . . 6**

**III. THE COMMISSION HAS FULLY CONSIDERED AND REJECTED  
PETITIONER'S REQUEST FOR ALLOWING THE "EMULATION" OF  
ESNS FOR EXTENSION PHONES . . . . . 7**

**IV. OTHER PETITIONS FOR RECONSIDERATION AND CLARIFICATION . . . . . 9**

**CONCLUSION . . . . . 10**

## **SUMMARY**

The Cellular Telecommunications Industry Association ("CTIA") commends and enthusiastically supports the implementation of the Commission's new ESN security rule (Section 22.919) which is specifically designed to help reduce the fraudulent use of cellular equipment caused by ESN tampering. CTIA opposes the petitions for reconsideration of Section 22.919 and urges the Commission not to amend Section 22.919 in any manner that would facilitate the fraudulent use of cellular equipment.

Contrary to petitioners' allegations, the adoption of Section 22.919 does not result in additional repair costs, increased customer inconvenience or interferes with a manufacturer's ability to provide repair service and service upgrades. Rather, the new ESN rule is a critical and necessary tool in combating cellular fraud. The Commission also has fully considered and appropriately rejected C2+'s request for allowing the "emulation" of ESNs for "extension" phones.

With regard to the other petitions for reconsideration and clarification outlined in Section IV of this document, CTIA supports the petitioners and urges the Commission to review their recommendations in view of its stated purpose to eliminate unnecessary information collection requirements and to streamline licensing procedures.

RECEIVED

JAN 20 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Revision of Part 22 of the	)	CC Docket No. 92-115
Commission's Rules Governing the	)	
Public Mobile Services	)	
	)	
Amendment of Part 22 of the	)	CC Docket No. 94-46
Commission's Rules to Delete	)	RM-8367
Section 22.119 and Permit the	)	
Concurrent Use of Transmitters	)	
in Common Carrier and Non-Common	)	
Carrier Service	)	

OPPOSITION/COMMENTS TO PETITIONS FOR RECONSIDERATION OF  
THE CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION

The Cellular Telecommunications Industry Association ("CTIA")<sup>1</sup> respectfully submits its Opposition/Comments to the petitions for reconsideration filed in the above-captioned proceeding.<sup>2</sup>

BACKGROUND

In 1992, the Commission adopted a Notice of Proposed Rule Making to revise Part 22 of its Rules.<sup>3</sup> In the Notice, the

---

<sup>1</sup> CTIA is a trade association whose members provide commercial mobile services, including over 95 percent of the licensees providing cellular service to the United States, Canada, Mexico, and the nation's largest providers of ESMR service. CTIA's membership also includes wireless equipment manufacturers, support service providers, and others with an interest in the wireless industry.

<sup>2</sup> In the Matter of Revision of Part 22 of the Commission's Rules Governing the Public Mobile Services, Report and Order, CC Docket No. 92-115, 9 FCC Rcd. 6513(1994) ("Part 22 Report and Order").

<sup>3</sup> In the Matter of Revision of Part 22 of the Commission's Rules Governing the Public Mobile Services, Notice of Proposed Rule Making, CC Docket No. 92-115, 7 FCC Rcd 3658 (1992) ("Notice").

Commission proposed a new rule specifically aimed at enhancing the security of the unique electronic serial number (ESN) of a mobile unit. Upon its complete review of the extensive record compiled in this proceeding,<sup>4</sup> the Commission, on August 2, 1994, adopted rules specifically designed to help reduce the fraudulent use of cellular equipment caused by tampering with the Electronic Serial Numbers (ESNs) of mobile units. Specifically, the Commission determined that the ESN must be programmed into the cellular mobile equipment at the factory and must not be alterable, transferable, removable or in any way able to be manipulated.<sup>5</sup> The Commission also adopted specific anti-fraud design specifications to ensure that any attempt to tamper with the ESN would render the mobile device inoperative.<sup>6</sup> In the *Part 22 Report and Order*, the Commission advised all cellular licensees and subscribers that the use of the C2+ altered cellular telephones constitutes a violation of the Act and the FCC's rules.<sup>7</sup>

Despite the Commission's substantial contribution to combating cellular fraud, several parties seek to hamper those efforts by seeking reconsideration of Section 22.919, a critical tool in

---

<sup>4</sup> Sixty-on comments and reply comments were filed by equipment manufacturers, cellular service providers and other interested parties in response to the Notice.

<sup>5</sup> *Part 22 Report and Order*, 9 FCC Rcd. at 6525, ¶¶ 54-63.

<sup>6</sup> *Id.*

<sup>7</sup> *Part 22 Report and Order*, 9 FCC Rcd. at 6525, ¶ 62.

combating cellular fraud.<sup>8</sup> These parties seek reconsideration of Section 22.919 for several reasons. First, they contend that the Commission's implementation of Section 22.919 will result in additional repair costs, increased customer inconvenience, and interferes with manufacturer repairs and service upgrade procedures.<sup>9</sup> Second, they argue that prohibiting C2+ and similar technology as well as requiring ESN "hardening" does not prevent cellular fraud.<sup>10</sup> Third, several petitioners propose alternatives to the Commission's implementation of Section 22.919, most of which have been fully considered and rejected by the Commission in the *Part 22 Report and Order*. Finally, several petitioners argue that Section 22.919 severely limits and perhaps eliminates "extension phones" for cellular service.<sup>11</sup>

---

<sup>8</sup> Petitioners include C2+ Technology ("C2+"), Celltek Corporation ("Celltek"), Cellular Paging Systems, Inc., Ericsson Corporation ("Ericsson"), MTC Communications ("MTC"), Sound & Cell, M.C. Stephan, and the Mobile and Personal Communications 800 Section of the Telecommunications Industry Association ("TIA").

<sup>9</sup> Ericsson Petition at 3-7; TIA Petition at 9-10.

<sup>10</sup> C2+ Petition at ii; Celltek Petition at 3; Ericsson Petition at 3, 8-10; Mitchell Petition at 2; MTC Petition at 4-5; and Stephan Petition at 1.

<sup>11</sup> In conjunction with its petition for clarification and reconsideration, TIA filed a motion requesting the Commission to stay Rule 22.919(c) until resolution of its petition for reconsideration. The FCC correctly denied TIA's motion and specifically noted that "the cost of implementing the new rule must be weighed against the far greater cost of allowing ESN 'cloning' to go virtually unchecked if the rule is not implemented." See *In the Matter of Revision of Part 22 of the Commission's Rules Governing the Public Mobile Services*, Order, FCC 94-357, CC Docket No. 92-115, released January 10, 1995, ¶ 13 ("Stay Order").

CTIA strongly opposes these petitions for reconsideration and urges the Commission not to amend Section 22.919 in any manner that would facilitate the fraudulent use of cellular equipment.

**I. THE ADOPTION OF SECTION 22.919 DOES NOT RESULT IN ADDITIONAL REPAIR COSTS, INCREASED CUSTOMER INCONVENIENCE OR INTERFERES WITH A MANUFACTURER'S ABILITY TO PROVIDE REPAIR SERVICE AND SERVICE UPGRADES.**

Ericsson and TIA contend that Section 22.919 will result in additional repair costs, increased customer inconvenience and interferes with manufacturer's repair services and service upgrade procedures.<sup>12</sup>

Adoption of the new ESN rule will not add to repair costs or inconvenience customers beyond the simple requirement that repair centers will need to contact the serving cellular carriers to reactivate the telephone with a new ESN/MIN combination. Prior to January 1, 1995, the effective date of Section 22.919, service centers commonly repaired cellular telephones by simply "swapping" the defective circuit board containing the ESN (as well as the phone's operating hardware and firmware) with a new board while the customer waits. The new rules simply require that the replacement circuit board must contain a factory-set ESN rather than a blank ESN that permits any ESN to be transferred to it. Thus, the new rule does not make field repairs impossible or prevent manufacturers from updating a cellular telephone's software and features. The only associated cost or inconvenience is the need to

---

<sup>12</sup> Ericsson Petition at 3-7; TIA Petition at 9-10.

contact the customer's cellular carrier to update the ESN/MIN information. In fact, the Commission has concurred that the new rules will not make field equipment repairs impossible and that authorized service centers can continue to make repairs which involve switching circuit boards with factory-set ESNs so long as they notify the carrier of the change.<sup>13</sup>

While TIA estimates that Section 22.919 could cost manufacturers \$30 million in ESN hardening software and \$100 million for installation, TIA does not provide the basis for such estimates.<sup>14</sup> Moreover, with cellular fraud costing the industry approximately \$1 million per day and resulting in increased costs to consumers and a substantial loss of potential tax revenues, the Commission has concurred that the cost of implementing Section 22.919 must be poised against "the far greater cost of allowing ESN cloning to go virtually unchecked if the rule is not implemented."<sup>15</sup>

Section 22.919 permits manufacturers to mitigate their costs by returning defective circuit boards to their factories for repair and refurbishing. CTIA understands Section 22.919 to permit a manufacturer to switch ESNs at their manufacturing facility.<sup>16</sup>

---

<sup>13</sup> Stay Order, ¶ 13.

<sup>14</sup> TIA Petition at 9-10.

<sup>15</sup> Stay Order, ¶ 13.

<sup>16</sup> If the Commission feels the Rule needs to be clarified in this regard, CTIA would support such clarification.

Following the filing of the TIA Petition, CTIA and TIA have made substantial progress in addressing the needs of their respective members. CTIA and its members need a clear rule, like Section 22.919, that specifically prohibits all ESN tampering and transfers;<sup>17</sup> TIA members need a transition period to permit the orderly design and development of mobile units that comply with the new ESN "hardening" requirements. CTIA supports this aspect of TIA's request. CTIA and TIA are working together to assess the need for additional "hardening" requirements in mobile units, including authentication.

**II. THE COMMISSION'S NEW ESN RULE IS A CRITICAL AND NECESSARY TOOL IN COMBATING CELLULAR FRAUD.**

Several petitioners argue that prohibiting C2+ and similar technology does not prevent cellular fraud, particularly with the significant number of phones already in the marketplace that can be easily modified.<sup>18</sup> Ericsson also contends that requiring ESN "hardening" does not prevent cellular fraud.<sup>19</sup>

With over eight years of experience in investigating and combating cellular fraud, CTIA agrees that the implementation of Section 22.919 alone will not eliminate cellular fraud. However, Section 22.919 and its subsequent enforcement are essential and

---

<sup>17</sup> A clear and unambiguous prohibition on tampering or transferring ESNs is necessary to assist law enforcement and prosecutors in the successful prosecution of those who engage in cellular fraud.

<sup>18</sup> C2+ Petition at ii, Celltek Petition at 3, Mitchell Petition at 2, MTC Petition at 4-5, Sound and Cell Petition at 3, and Stephan Petition at 1.

<sup>19</sup> Ericsson Petition at 8-10.

critical for the protection against a prevalent type of cellular fraud, i.e., "phone cloning" via tampering with the ESN. Cellular fraud is a multi-faceted and ubiquitous problem that is constantly evolving as the industry detects and defeats each new type of fraud. CTIA recognizes that combating such a problem requires multiple approaches and solutions rather than a one dimensional strategy. Such approaches and solutions, however, must complement one another to provide optimal results in combating cellular fraud.

While several petitioners provide alternative methods such as authentication,<sup>20</sup> FCC licensing of ESN reprogrammers,<sup>21</sup> and mandatory recall and modification of phones,<sup>22</sup> CTIA strongly urges the Commission to review such alternatives in view of whether they offer "a potential complementary level of protection against fraud rather than a substitute for ESN regulation."<sup>23</sup>

**III. THE COMMISSION HAS FULLY CONSIDERED AND REJECTED PETITIONER'S REQUEST FOR ALLOWING THE "EMULATION" OF ESNs FOR EXTENSION PHONES.**

In its *Part 22 Report and Order*, the Commission fully considered and appropriately rejected C2+'s arguments for allowing companies to market ancillary cellular equipment which "emulates"

---

<sup>20</sup> Ericsson Petition at 10; TIA Petition at 12. CTIA supported authentication in its original comments in this docket, and supports the industry efforts to include authentication in the next generation of cellular telephones.

<sup>21</sup> MTC Petition at 12. CTIA opposes licensing of ESN reprogrammers because there is no legitimate need for anyone (outside of a manufacturing facility) to transfer an ESN.

<sup>22</sup> MTC Petition at 5.

<sup>23</sup> Stay Order, ¶ 12.

ESNs for the purpose of providing extension phones to consumers.<sup>24</sup> In its petition, C2+ simply reiterates these arguments, *i.e.*, the C2+ technology for cloning ESNs benefits the public, is not intended for fraudulent use, and does not adversely affect the integrity and security of the mobile unit. The petitioner does not provide any significant, additional evidence that warrants the Commission's modification or repeal of its decision concerning C2+ technology and the use of cloned phones. While C2+ lists the precautions it takes to ensure that its technology is not used fraudulently,<sup>25</sup> such precautionary measures have not provided cellular carriers and its customers adequate protection against cellular fraud. Through its various fraud investigations, the CTIA Fraud Task Force has information that C2+ type technology has been used to alter cellular telephones for the purpose of defrauding and has also been used by those engaged in illegal narcotic activity.

While several petitioners suggest that the new ESN rules severely limits or eliminates the availability of "extension" phones to consumers, such allegations are not true. Cellular carriers have begun offering customers true extension phone service that fully complies with Section 22.919 and all other Commission regulations. Cellular carriers provide this service by modification to their switch which permits them to associate

---

<sup>24</sup> Part 22 Report and Order, 9 FCC Rcd. at 6525-6526. "Emulation", a term used by C2+ and its dealers, is pure and simple cloning of cellular phone.

<sup>25</sup> C2+ Petition at 8-11.

multiple ESNS with a single MIN. Not only does this method produce legitimate extension phone service that fully complies with the Commission's rules, as a switch-based service it provides legitimate cellular customers superior service and more features than does a cloned phone.

#### IV. OTHER PETITIONS FOR RECONSIDERATION AND CLARIFICATION

Several parties filed petitions seeking reconsideration and clarification of the Commission's decisions concerning disclosure of real parties in interest,<sup>26</sup> shared use of transmitters,<sup>27</sup> termination of service to subscribers engaged in fraud,<sup>28</sup> transfer and assignment notifications,<sup>29</sup> cellular renewal proceedings and the withdrawal of applications,<sup>30</sup> SIU filings,<sup>31</sup> and FCC Form 600.<sup>32</sup> CTIA supports the petitioners and respectively requests the Commission to review the petitioners' recommendations to clarify these rules and make any modifications needed that would further the Commission's stated purpose for instituting the Part 22 Rewrite proceeding, *i.e.*, to eliminate unnecessary information collection requirements and to streamline licensing procedures.

---

<sup>26</sup> BellSouth Petition at 16; GTE Petition at 12; McCaw Petition at 7.

<sup>27</sup> BellSouth Petition at 6; McCaw Petition at 31.

<sup>28</sup> McCaw Petition at 42.

<sup>29</sup> AirTouch Petition at 3; BellSouth Petition at 11; GTE Petition at 7.

<sup>30</sup> GTE Petition at 10; McCaw Petition at 44.

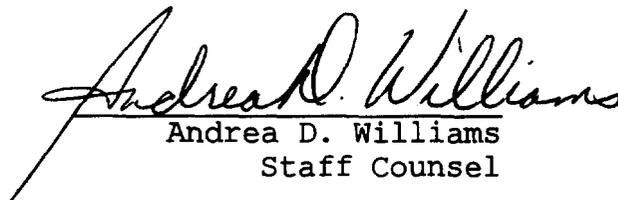
<sup>31</sup> AirTouch Petition at 11; McCaw Petition at 45.

<sup>32</sup> AirTouch Petition at 13; GTE Petition at 9; Southwestern Bell Petition at 10.

**CONCLUSION**

CTIA commends and enthusiastically supports the Commission's implementation of the new Part 22 rules. With respect to the new ESN rule, the Commission's action is a clear message that it is serious in its efforts to help combat cellular fraud. For the reasons described above, CTIA respectfully requests the Commission to deny the petitions for reconsideration of Section 22.919. Finally, the Commission should review the other petitions for reconsideration and clarification discussed above as recommendations for streamlining its Part 22 licensing procedures and eliminating unnecessary regulatory reporting requirements.

Respectfully submitted,

  
Andrea D. Williams  
Staff Counsel

Michael F. Altschul  
Vice President, General Counsel

Randall S. Coleman  
Vice President, Regulatory Policy and Law

**CELLULAR TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION**  
1250 Connecticut Avenue, N.W., Suite 200  
Washington, D.C. 20036

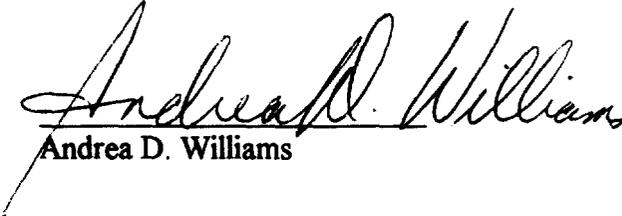
January 20, 1995

## **CERTIFICATE OF SERVICE**

I, Andrea Williams, hereby certify that on this 20th day of January, 1995 copies of the foregoing Oppositions/Comments to Petitions for Reconsideration of the Cellular Telecommunications Industry Association were served by hand delivery upon the following parties:

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

**International Transcript Service**  
**1919 M Street, N.W., Room 246**  
**Washington, D.C. 20554**

  
**Andrea D. Williams**

## **CERTIFICATE OF SERVICE**

I, Andrea D. Williams, hereby certify that on this 20th day of January, 1995, copies of the foregoing Opposition/Comments to Petitions for Reconsideration of the Cellular Telecommunications Industry Association were sent by U.S. mail, postage prepaid, to the following parties:

**Cathleen A. Massey**  
Senior Regulatory Counsel  
McCaw Cellular Communications, Inc.  
1150 Connecticut Avenue, NW, 4th Floor  
Washington, DC 20032

**Carl W. Northrop**  
E. Ashton Johnston  
Bryan Cave  
700 13th Street, NW, Suite 700  
Washington, DC 20005-3970  
Counsel for Triad Cellular Corporation

**Louis Gurman**  
Doane F. Kiechel  
Gurman, Kurtis, Blask & Freedman, Chartered  
1400 16th Street, NW, Suite 500  
Washington, DC 20036  
Counsel for Western Wireless Corporation

**M.G. Heavener**  
President  
MTC Communications  
Box 2171  
Gaithersburg, MD 20886

**Mark J. Golden**  
Personal Communications Industry Association  
1019 19th Street, NW, Suite 1100  
Washington, DC 20036

**William A. Doyle**  
President  
InterDigital Communications Corporation  
2200 Renaissance Blvd., Suite 105  
King of Prussia, PA 19406

**Lawrence W. Katz**  
1710 H Street, NW  
Washington, DC 20006  
Counsel for The Bell Atlantic Telephone Companies

**M.C. Stephan**  
5002 Mussetter Road  
Ijamsville, MD 21754

**Ron Foster**  
President  
CellTek Corporation  
4647T Hwy 280 E., Suite 260  
Birmingham, AL 35242

**Steve Jones**  
Proprietor  
Sound & Cell  
2925 W. Navy Blvd.  
Pensacola, FL 32505

**John Mitchell**  
Cellular Paging Systems, Inc.  
3122 West Marshall Street  
Richmond, VA 23230

**Wayne Watts, Vice President and General Attorney**  
**Bruce E. Beard, Attorney**  
Southwestern Bell Mobile Systems, Inc.  
17330 Preston Road, Suite 100A  
Dallas, TX 75252

**Ellen S. Mandell**  
Pepper & Corazzini, LLP  
200 Montgomery Building  
1776 K Street, NW, Suite 200  
Washington, DC 20006  
Counsel for Alpha Express, Inc.

**David L. Hill**  
**Audrey P. Rasmussen**  
O'Connor & Hannan  
1919 Pennsylvania Avenue, NW, Suite 800  
Washington, DC 20006  
Counsel for Paging Partners Corporation

**Counsel for Source One Wireless, Inc.**

**Jerome K. Blask  
Jeanne M. Walsh  
Gurman, Kurtis, Blask & Freedman, Chartered  
1400 16th Street, NW, Suite 500  
Washington, DC 20008  
Counsel for ProNet Inc.**

**Thomas J. Dougherty, Jr.  
Francis E. Fletcher, Jr.  
Gardner Carton & Douglas  
1301 K Street, NW, Suite 900  
Washington, DC 20005  
Counsel for Sussex Cellular, Inc.**

**Judith St. Ledger-Roty  
Reed Smith Shaw & McClay  
1200 18th Street, NW  
Washington, DC 20036  
Counsel for Paging Network, Inc.**

**Louise Cybulski  
Pepper & Corazzini, LLP  
1776 K Street, Suite 200  
Washington, DC 20006  
Counsel for Pac-West Telecomm, Inc. and  
PagePrompt USA**

**James F. Rogers  
Raymond B. Grochowski  
Latham & Watkins  
1001 Pennsylvania Avenue, NW, Suite 1300  
Washington, DC 20004  
Page America Group, Inc.**

**Gerald S. McGowan  
George L. Lyon, Jr.  
John B. Branscome  
Lukas, McGowan, Nace & Gutierrez, Chartered  
1111 19th Street, NW, Suite 1200  
Washington, DC 20036  
Counsel for PCS Development Corporation  
Counsel for Dial Page, Inc.**

**L. Andrew Tollin  
Michael Deuel Sullivan  
Robert G. Kirk  
Wilkinson, Barker, Knauer & Quinn  
1735 New York Avenue, NW, Suite 600  
Washington, DC 20006  
Counsel for BellSouth Corporation**

**William B. Barfield  
Jim O. Llewellyn  
BellSouth Corporation  
1155 Peachtree Street, NE  
Atlanta, GA 30309-3610**

**Charles P. Featherstun  
David G. Richards  
BellSouth Corporation  
1155 21st Street, NW, Suite 900  
Washington, DC 20036**

**Dennis Myers  
Vice President and General Counsel  
Ameritech Mobile Services, Inc.  
2000 West Ameritech Center Drive  
Location 3H78  
Hoffman Estates, IL 60195-5000**

**Timothy J. Fitzgibbon  
Thomas F. Bardo  
Carter, Ledyard & Milburn  
1350 I Street, NW, Suite 870  
Washington, DC 20005  
Counsel for C-Two-Plus Technology, Inc.**

**David C. Jatlow  
Young & Jatlow  
2300 N Street, NW  
Washington, DC 20037  
Counsel for The Ericsson Corporation**

**Kathryn A. Zachem**  
**Kenneth D. Patrich**  
**Wilkinson, Barker, Knauer & Quinn**  
**1735 New York Avenue, NW**  
**Washington, DC 20006**  
**Counsel for AirTouch Communications, Inc. and**  
**US West NewVector Group, Inc.**

**David A. Gross**  
**Kathleen Q. Abernathy**  
**AirTouch Communications, Inc.**  
**1818 N Street, NW**  
**Washington, DC 20036**

**Donald M. Mukai**  
**US West NewVector Group, Inc.**  
**3350 161st Avenue, SE**  
**Bellevue, WA 98008**

**Louis Gurman**  
**Andrea S. Miano**  
**Gurman, Kurtis, Blask & Freedman, Chartered**  
**1400 16th Street, NW, Suite 500**  
**Washington, DC 20036**  
**Counsel for Palouse Paging, Inc. and**  
**Sawtooth Paging, Inc.**

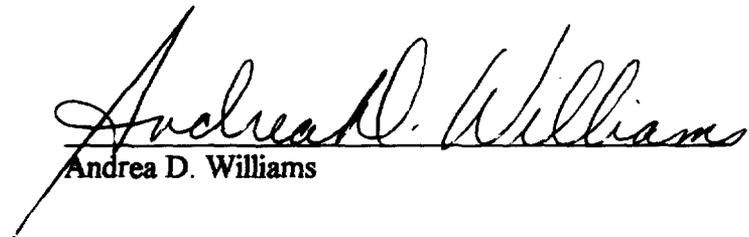
**Thomas J. Casey**  
**Antoinette Cook Bush**  
**David H. Pawlik**  
**Skadden, Arps, Slate, Meagher & Flom**  
**1440 New York Avenue, NW**  
**Washington, DC 20005**  
**Counsel for Cellular Communications of Puerto Rico, Inc.**

**John A. Prendergast**  
**Harold Mordkofsky**  
**Blooston, Mordkofsky, Jackson & Dickens**  
**2120 L Street, NW, Suite 300**  
**Washington, DC 20554**  
**Counsel for Massachusetts-Connecticut Mobile Telephone Company,**  
**Mobile Radio Communications, Inc., and Radiofone, Inc.**

Andre J. Lachance  
1850 M Street, NW, Suite 1200  
Washington, DC 20036  
Counsel for GTE Service Corporation

Grier C. Raclin  
Francis E. Fletcher  
Anne M. Stamper  
Gardner, Carton & Douglas  
1301 K Street, NW  
Suite 900, East Tower  
Washington, DC 20005  
Counsel for The Mobile and Personal Communications 800 Section  
of the Telecommunications Industry Association

Frederick M. Joyce  
Christine McLaughlin  
Joyce & Jacobs  
1019 19th Street, NW  
14th Floor  
Washington, DC 20036  
Counsel for Metrocall, Inc.  
Counsel for Celpage, Inc.

  
Andrea D. Williams