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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 90 of the Commission's Rules to Facilitate Future Development of SMR Systems in the 800 MHz Frequency Band	)	PR Docket No. 93-144
and		
Implementation of Section 309(j) of the Communications Act - Competitive Bidding 800 MHz SMR	)	PP Docket No. 93-253

To: The Commission

JOINT REPLY COMMENTS

Date: March 1, 1995

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SUMMARY

Radio Communications Center, Deck's Communications, Inc., Air Communications, Inc., North Plains Communications, Inc., Alan Johansen d/b/a Al's Radio & Marine Electronics, Control Communications Corp., Stan's Communications, Inc., Triangle Communications, Inc., General Communications, Inc., Nielson Communications, Inc., Allied Radio Communications, Inc., Southern Minnesota Communications, Inc., Industrial Electronics, Inc., Mobile Communications of Miami, Inc., T & K Communications Systems, Inc., Intermountain Communications of Southern Idaho, Inc., Platte Valley Communications, Inc., Bill Wayne d/b/a Mr. Radio, Robert Fetterman d/b/a R.F. Communications, XW Corporation, Radicom, Inc., Mobile Relay Associates, Inc., Coast Communications, Inc., Graybill Electronics, Inc., Elder's Radio Communications, Lee's Two-Way Radio, Inc., Electronic Specialists, Inc., Radio Communications Company of Cary, Inc., Hinds & Campbell Properties, Inc., Almar Communications, Inc., Three-Way Communications, Inc., Knight's Communications, Inc. ("Knight"), IDA Corporation ("IDA"), RCM, Inc. ("RCM"), Wecom, Inc. ("Wecom"), Atlantic Communications, Inc., South Central Radio, Inc., Trident, Inc., Future Communications, Inc., Keane Communications, Inc., Stone's Mobile Radio, Inc., Hendrix Electronics, Inc., Solar Communications, Inc., SMR Services, Inc., Delta Communications, Inc., California Trunking, Inc., Felder Communications, Inc., B & C Communications, Inc., and J. G. Boswell Company (collectively the "Joint Commenters") respectfully submit their Reply Comments in response to the

Comments filed by various parties in the above-captioned proceeding.

As discussed below, the Commission's proposal is not in the best interests of the Joint Commenters or the rest of the SMR industry. Indeed, the Commission's proposal only benefits Nextel.

While the Joint Commenters oppose the Commission's proposal, they have even greater objection to Nextel's variation on the Commission's proposal, which requests that the Commission create a single, 200 channel block and require mandatory relocation of the incumbent operators.

The Joint Commenters have reviewed a summary of PCIA's Comments in this proceeding, and the SMR Operators believe that the PCIA proposal represents the best solution to create a geographic licensing mechanism while protecting the rights of incumbent licensees. The Joint Commenters believe that in this framework they may choose to acquire a geographic license, may choose to work with other operators, and may choose the type of services they wish to offer. Therefore, the Joint Commenters urge the Commission to adopt the PCIA proposal.

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REPLY COMMENTS

Radio Communications Center ("Radio Com"), Deck's Communications, Inc. ("Deck"), Air Communications, Inc. ("Air Com"), North Plains Communications, Inc. ("North Plains"), Alan Johansen d/b/a Al's Radio & Marine Electronics ("Al's Radio"), Control Communications Corp. ("Control"), Stan's Communications, Inc. ("Stan's"), Triangle Communications, Inc. ("Triangle"), General Communications, Inc. ("General"), Nielson Communications, Inc. ("Nielson"), Allied Radio Communications, Inc. ("Allied"), Southern Minnesota Communications, Inc. ("Southern Minnesota"), Industrial Electronics, Inc. ("Industrial"), Mobile Communications of Miami, Inc. ("Mobile Com. of Miami"), T & K Communications Systems, Inc. ("T & K"), Intermountain Communications of Southern Idaho, Inc. ("Intermountain"), Platte Valley Communications, Inc. ("Platte Valley"), Bill Wayne d/b/a Mr. Radio ("Mr. Radio"), Robert

Fetterman d/b/a R.F. Communications ("RF Com."), XW Corporation ("XW"), Radicom, Inc. ("Radicom"), Mobile Relay Associates, Inc. ("Mobile Relays"), Coast Communications, Inc. ("Coast Com."), Graybill Electronics, Inc. ("Graybill"), Elder's Radio Communications ("Elder's"), Lee's Two-Way Radio, Inc. ("Lee's"), Electronic Specialists, Inc. ("Electronic"), Radio Communications Company of Cary, Inc. ("RCC"), Hinds & Campbell Properties, Inc. ("Hinds & Campbell"), Almar Communications, Inc. ("Almar"), Three-Way Communications, Inc. ("Three-Way"), Knight's Communications, Inc. ("Knight"), IDA Corporation ("IDA"), RCM, Inc. ("RCM"), Wecom, Inc. ("Wecom"), Atlantic Communications, Inc. ("Atlantic"), South Central Radio, Inc. ("South Central"), Trident, Inc. ("Trident"), Future Communications, Inc. ("Future"), Keane Communications, Inc. ("Keane"), Stone's Mobile Radio, Inc. ("Stone's"), Hendrix Electronics, Inc. ("Hendrix"), Solar Communications, Inc. ("Solar"), SMR Services, Inc. ("SMR Services"), Delta Communications, Inc. ("Delta"), California Trunking, Inc. ("Cal. Trunking"), Felder Communications, Inc. ("Felder"), B & C Communications, Inc., and J. G. Boswell Company ("Boswell") (collectively the "Joint Commenters") pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. §1.415, respectfully submits their Reply Comments in response to the Comments filed by various parties in the above-captioned proceeding.

I. BACKGROUND

Radio Com., B & C and Deck filed initial Comments prepared on their behalf by Pittencrieff Communications, Inc. ("Pittencrieff").

At the time, Radio Com., B & C and Deck were concerned with protecting their businesses, and their Comments reflect such concerns. Radio Com., B & C and Deck have since become aware of the Personal Communications Industry Association's ("PCIA") proposal and how each could actually participate in geographic licensing if adopted. Therefore, Radio Com. and Deck now support the PCIA proposal as being fair to all SMR Operators.

The remaining SMR Operators and manufacturers are similarly concerned with the future of their businesses as the result of the Commission's proposals and the requests of Nextel, Inc. ("Nextel").[1] Typically, when joint Comments of a large number of

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[1]IDA and Trident are manufacturers of private land mobile radio equipment. Each company specializes in equipment to expand the services offerings and efficiency of SMR systems. Equipment manufactured by IDA and Trident is used by hundreds of SMR operators across the country. The future of both companies is closely intertwined with the outcome of this proceeding.

Air Comm. operates 800 MHz SMR channels in the Wisconsin Rapids area of Wisconsin. XW operates 70 channels in the Los Angeles area. South Central 16 channels in the Anchorage, Alaska area. B & C operates 27 channels in the Columbus, Ohio area and is the licensee of an additional 20 channels in other portions of the United States. Intermountain operates 10 channels in the Boise, Idaho area. Southern Minnesota operates 50 channels in the Rochester, Minnesota area. Hendrix operates 38 channels in Southern California and Western Arizona. Allied operates 4 channels in the San Francisco area. Industrial operates 100 channels in Northeast Pennsylvania. T & K operates 27 channels in the Southern Tier Region of upstate New York. Coast Com. operates 10 channels in Myrtle Beach, South Carolina. Triangle operates 40 channels in the South Central Pennsylvania area. Felder operates SMR systems in the Joaquin Ridge area of California. Mobile Com. of Miami operates SMR Systems in Miami, Florida. Stone's operates 87 channels in North Dakota and Northwest Minnesota. Wecom operates 20 channels in the Kingman, Arizona area. Mr. Radio operates SMR systems in the Bullhead City, Arizona area. Three-Way operates 6 channels in the Hartford, Connecticut area. RF Com. operates 47 channels in the Williamsport, Pennsylvania area. North Plains operates SMR channels in North Dakota. Mobile Relays

parties such as this pleading are filed, the names of the parties are listed in an attachment. That practice is not used here, as each party wants the Commission to review every name and recognize that there is a healthy, vibrant SMR industry which exists outside of Nextel, OneComm and DialCall.

These parties are but a small part of many operators which have built the SMR industry with the sweat of hard labor and rigorous competition. The parties wish to remain competitive, and herein inform the Commission of their presence and intentions.

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operates 80 channels between Los Angeles and Denver. Al's Radio operates 10 channels in the Prince William Sound area of Alaska. Control operates 3 channels on Mount Diablo in California. General operates 20 channels in the Hartford, Connecticut area. Nielson operates SMR channels in Wisconsin. Knight operates 11 channels in the Augusta, Maine area. Platte Valley is a two-way radio dealer in Southcentral Nebraska. Radicom operates 5 channels in Northeast Illinois. Graybill operates 10 channels in the Cedar Rapids area of Iowa. Elders operates 60 channels in and around the Fargo, North Dakota area of the Red River Valley. Lee's manages 12 channels in Southern California. Boswell is the licensee of 5 SMR channels on Joaquin Ridge in California. Stan's operates 5 channels in the Grand Forks area of North Dakota. Electronic operates 800 MHz SMR channels in Iowa. RCC manages SMR channels in North Carolina. Hinds operates SMR channels in Birmingham, Alabama. Almar operates SMR channels in Illinois. RCM operates SMR channels in Maine. Future operates SMR channels in New Brunswick, New Jersey. Keane operates SMR channels in Iowa. Solar Comm. operates SMR channels in California. Atlantic operates 25 channels in Central Maine. SMR Services, in conjunction with Voice Link Communications, through agreement with numerous licensees, some of which acquired their licenses through application mills, is in the process of constructing 30 channels in South Carolina and is in negotiations with additional licensees. Delta Communications operates 30 channels in Honolulu, Hawaii. The principal of Cal. Trunking operates 45 SMR channels in the Los Angeles, California area with 2615 mobile units. Cal. Trunking is also the licensee of an additional 30 channels throughout the country which are managed by other entities.

II. REPLY COMMENTS

It has become increasingly difficult over the past two years for the Joint Commenters to compete in the provision of their services. The difficulties have not been the result of the marketplace, rather the difficulties have been of a regulatory nature. The Commission's difficulty with processing the application backlog has left legitimate operators such as the Joint Commenters unable to expand their businesses and provide new services as systems become congested.

While the Commission has granted hundreds of new channels at a single location pursuant to wide-area authority in remote locations, the Commission has not provided relief to local operators when relief has been requested. For example, for a two year period prior to the Commission's recent elimination of the five year recovery rule for "older" unloaded trunked systems, the Commission stated that the industry's concern regarding artificial waiting lists in rural areas was "speculative".

The current concern of the Joint Commenters is the Commission's proposal in PR Docket No. 93-144. Originally, this proceeding was intended as an attempt to license spectrum more efficiently, recognizing the needs of the SMR operator. Now the proceeding has turned into an attempt to again hold an auction, without any consideration of the impact to the small businesses which the proposals will harm.

As discussed below, the Commission's proposal is not in the best interests of the Joint Commenters or the rest of the SMR industry. Indeed, the Commission's proposal only benefits Nextel.

While the Joint Commenters oppose the Commission's proposal, they have even greater objection to Nextel's variation on the Commission's proposal, which requests that the Commission create a single, 200 channel block and require mandatory relocation of the incumbent operators.

The Joint Commenters have reviewed a summary of PCIA's Comments in this proceeding, and the SMR Operators believe that the PCIA proposal represents the best solution to create a geographic licensing mechanism while protecting the rights of incumbent licensees. The Joint Commenters believe that in this framework they may choose to acquire a geographic license, may choose to work with other operators, and may choose the type of services they wish to offer. Therefore, the Joint Commenters urge the Commission to adopt the PCIA proposal. However, the Joint Commenters wish to discuss the impact on their individual businesses of two issues in this proceeding, mandatory relocation and the channel block size.

A. Another Cellular-Sized Competitor Is Not Needed

Recently, Congress questioned the wisdom of the Commission's proposal in this proceeding. Five United States Senators, in a letter dated January 17, 1995 and addressed to Chairman Hundt, asked:

> Given that each market in the nation already has two operating cellular systems and that the FCC will soon license three to six new PCS systems to serve each area, what evidence does

> the FCC have that an additional one to four new cellular-type SMR systems are needed in each Major Trading Area (MTA)?

The Joint Commenters believe that no evidence of a need exists. The real need of the public is to retain a competitive environment where operators of different sizes offering a multitude of different services. The Commission's proposal and Nextel's variation will rob the marketplace of the user's choice by eliminating any growth possibilities on the part of independent SMR operators.

B. **The Joint Commenters Oppose Mandatory Relocation Of Incumbents**

Generally, the Joint Commenters support a form of wide-area licensing which allows **existing** licensees flexibility in site selection and growth possibilities, reduces speculative filings and reduces the Commission's burden to process applications quickly. However, the Joint Commenters would be devastated by the mandatory relocation proposal submitted by Nextel. While the Commission has not initially proposed to include the mandatory relocation provision, Nextel has continued to push this request.

The impact of mandatory retuning cannot be minimized. Dispatch radios cannot be retuned one by one over a period of time. Rather, an entire fleet must be retuned at the same time in order to ensure that the fleet can continue to communicate with each other. In addition, some of the Joint Commenters are participants in analog roaming networks. Therefore, thousands of users over a multi-state region would need to be reprogrammed in order to accommodate the retuning of just the one of the systems in the

network. This logistical, costly exercise would benefit only one party, Nextel.

Nextel is the only entity with enough 800 MHz spectrum to move a significant number of incumbents. Mandatory relocation only benefits Nextel, and penalizes every other operator. However, Nextel's Comments prove that even under the best circumstances mandatory re-tuning cannot be accomplished.

In Chicago, where Nextel has one of its strongest channel positions, it still can not re-tune 16 of 65 existing SMR systems in Chicago. Thus, Nextel could not achieve its goal of contiguous spectrum in Chicago even with a Commission mandate. However, it **could** be accomplished by Nextel's own recommendations of "... voluntary channel swaps, operating agreements, channel purchases and mergers..."[2]

The Joint Commenters are not attempting to stop Nextel from attempting to achieve its goal. If Nextel can successfully obtain contiguous spectrum through "... voluntary channel swaps, operating agreements, channel purchases and mergers...", it should be permitted to utilize whatever technology it desires which does not interfere with other licensees. However, Nextel's success should be accomplished through the usual workings of the marketplace.

C. **Advanced Technology Does Not Require Contiguous Spectrum**

When Nextel (then Fleet Call) requested its initial waiver, it represented to the Commission that it could operate in the crowded spectrum environment which defines the 800 MHz market.

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[2]Nextel Comments at 39.

However, Nextel now seeks to convince the Commission that it needs <u>contiguous</u> spectrum and larger channel blocks, and wants the Commission to create virgin spectrum out of spectrum on which licensees have thriving businesses serving hundreds of thousands of mobile units.

Nextel claims that "[w]ide-area SMRs must have access to exclusive-use, contiguous channels assigned on a geographic basis like those available to every other broadband CMRS competitor.[3] However, contiguous spectrum is not a **must** for competitive systems to operate. The Comments of Southern Company, which is implementing a MIRS system, states that:

> The greatest unsubstantiated assumption of this proceeding is that contiguous spectrum, especially the upper 200 SMR channels, is needed for SMR to compete with cellular. First, wide-area SMR systems are not designed to compete head-to-head with cellular telephony, but rather will complement cellular service, reaching distinct parts of the mobile services market. Second, all 200 channels are not necessary to build a competitive wide-area system. Third, the digital design of wide-area SMR equipment does not require contiguous spectrum.[4]

In its Comments, Ericsson Corporation, which is now selling its highly efficient EDACS technology, also does not believe that contiguous spectrum is necessary for a competitive mobile system.

In footnote 52 of its Comments, Nextel states that it must maintain a guardband on each frequency to preclude interference to adjacent channel, non-affiliated station. However, when Nextel

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[3]Nextel Comments at 2.

[4]Southern Comments at 6.

(then Fleet Call) requested its original waiver, Nextel stated that:

> FCI [Fleet Call] has noted apparent concern in the private land mobile community regarding the increased potential for adjacent channel interference from these emissions in an ESMR system. FCI initially proposed a 16-mile separation between ESMR base stations and adjacent channel existing SMR base station to control adjacent channel interference. In addition, FCI could "engineer around" such difficulties with additional mileage separations and other engineering modifications.
>
> As discussed above, FCI has now become aware of Motorola's new digital transmission technology that will conform to the digital emission mask described in Section 90.209(g) of the Rules. The benefit of this approach is that by occupying less than the full 25 KHz bandwidth, adjacent channel interference concerns are eliminated. This new equipment will also utilize TDMA architecture to achieve the equivalent of <u>six</u> voice channels from the occupied bandwidth. In other words, this digital technology will provide for even greater efficiency than originally projected without creating adjacent channel interference, while eliminating the need for a 16-mile separation.
>
> Given the advantages of this approach, FCI no longer needs any restrictions on the ability of either present or future adjacent channel licensees to modify or move their transmitting facilities within the current specifications of the Commission's Rules. Thus, all interference concerns of adjacent channel and second-adjacent channel licensees should be resolved. FCI is willing to incur additional expense to implement this new technology to better protect other licensees and to achieve even greater capacity increases.[5]

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[5]Comments of Fleet Call, Inc., FCC File No. LMK-90036, filed June 7, 1990 at pp. 7-8. (footnotes omitted).

Nextel now requests that the Commission move every other operating SMR System to create contiguous spectrum which Nextel originally represented was not necessary for its service offering. However, solving any problems which Nextel may have with its technology should not be the responsibility of the rest of the SMR industry.

This is not to say that the Joint Commenters believe that advancements in technology and service offerings should be stymied and held back in any way. However, **all** operators must have the opportunity to grow and expand their businesses. The marketplace should determine which businesses survive, it should not be the province of the Commission to interfere in the natural evolution of the marketplace.

D. **The Joint Commenters Are Not Thwarting The Introduction Of New Technology**

Nextel classifies service providers such as the Joint Commenters as "[e]xisting operators using 20-year old, inefficient technology..." and suggests that such operators "... should not now be accorded the right to thwart the introduction of more efficient technology and new improved services."[6] In fact, the record documents that many analog SMR operators have committed to huge construction projects with advanced technology equipment.

Further, SMR trunked technology is not "inefficient". Trunking technology is one of the Commission's greatest success stories, and continues to provide an efficient service. It is in

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[6]Nextel Comments at 9.

fact the success of this technology that allowed companies such as Nextel to be created. Further, analog SMR operations continue to update to offer new and improved services to customers. Many of the services which Nextel offers or plans to offer are currently offered by analog SMR systems where there is a customer demand.

The Joint Commenters are not attempting to "thwart" technological innovation. Instead, the Joint Commenters have been attempting to work with the Commission to arrive at a licensing mechanism which will allow the Joint Commenters to implement their own technological innovation. However, Nextel's proposal only allows Nextel to be innovative. The proposal locks the balance of the SMR industry into a system which provides independent SMR operators with no hope of growing or expanding their businesses. It is not the Joint Commenters that are "thwarting" technological innovation, however Nextel's proposal would "thwart" technological innovation by the **entire** SMR industry.

Nextel statement ignores the efforts of other SMR operators to implement the next generation of equipment. For example, Southern Companies (which is implementing a MIRS System), Industrial Communications and Electronics (which is also implementing a MIRS System), Speed-Net, Parkinson Electronics Company, Mobile Relays, Inc., Racom Corp. (which is implementing an EDACS system), and other companies are investing millions of dollars in new equipment and technology.

E. "Wide-Area" Is Not Just Nextel

In footnote 5 of its Comments, Nextel seeks to define "wide-area SMR" systems as:

> ... those that use a digital transmission technology in a low-power, multiple base station configuration incorporating frequency reuse and call hand-off and that are capable of providing high-capacity, two-way cellular-like mobile telephone, fleet dispatch and customized dispatch service over large geographic areas. Wide-area SMR base station in urban areas typically operate at less than 100 watts ERP and at less than 100 watts ERP and at less than 200 foot antenna heights.... Although some local SMRs use a series of high power base stations to provide wider-area or regional coverage, they do not employ spectrum efficient technologies with a frequency reuse architecture or call hand-off capability.

The impact of Nextel's proposed "definition" would be to limit Nextel as the only applicant for a geographic license. However, Parkinson, Speed-Net, Mobile Relays, Racom and others provide or intend to construct systems which offer the same services over the same geographic areas as Nextel. There can be no rationale that limits an applicant seeking a geographic license to Nextel's chosen technology.

A spectrum efficient system does not necessarily require frequency reuse, as suggested by Nextel. EDACS, Geotek's Frequency Hopping Multiple Access ("FHMA") technology (which uses high power sites) or any other technology, which does not necessarily need frequency reuse, are efficient, and operational. It is not the technology choice which governs whether frequency reuse is utilized, rather it is the necessity for channel capacity.

The implementation of frequency reuse in areas where additional channel capacity is not necessary results in much higher infrastructure costs and needless costs for consumers. The limited definition requested by Nextel must be rejected by the Commission.

F. **Wide-Area Licensing - Channel Blocks And Geographic Areas**

The Joint Commenters would like to file applications for geographic licenses in their respective service areas. However, the Commission's proposal makes such applications impossible. First, the MTA blocks proposed by the Commission are far too large, requiring the Joint Commenters to attempt to build-out geographic areas in which they cannot compete, with frequencies from which they cannot relocate incumbents.

The Commission's proposal to allocate channels in four 50 channel blocks would result in the need to re-tune every radio that operates in the 861-865 MHz portion of the band. Currently, a five channel authorization is issued for five channels separated by 1 MHz each (i.e. 861.0125, 862.0125, 863.0125, 864.0125 and 865.0125 MHz). The Commission's proposal would allocate the five channels into four separate blocks. Therefore, even if the licensee was a successful applicant for one 50 channel block, the licensee would have to re-tune every radio in the licensee's system as each radio is already operating on channels assigned in all four blocks. Unless the licensee is the successful applicant for **all** four blocks, re-tuning of the radios must be accomplished to keep the radios within the 50 channel block. This re-tuning presents a logistical problem which the Commission has failed to consider.

In contrast, PCIA's proposal to allocate geographic licenses in 10 channel blocks in a pattern similar to today's assignment methodology would avoid this problem and reduce the need to re-tune any radios to a bare minimum.

The Joint Commenters believe that the Commission has an opportunity, through adoption of PCIA's proposal to license smaller channel blocks in smaller service areas, to create a licensing system whereby the need to sub-license is minimized, and any sub-licensing is pursuant to the dictates of the marketplace, not the regulatory power of one licensee over another.

The Joint Commenters remain strongly opposed to any auction of channels in the band. 47 U.S.C. §309(j)(6)(E), requires the Commission to "... continue to use engineering solutions, negotiation, threshold qualifications, service regulations, and other means in order to avoid mutual exclusivity in licensing proceedings." The Joint Commenters believe that the Commission has been given a valid proposal which uses such "solutions" to minimize speculative applications.

It was the intention of Congress in granting auction authority to give the Commission an alternative licensing mechanism with which to discourage speculative filings. However, a review of the legislative history shows that Congress intended auctions to be imposed on new services, not reconfigurations of existing services.[7] The Commission is not creating a new service in this proceeding, it is creating a new licensing mechanism for existing

[7]H.R. Rep. No. 103-111, 103d Cong. 1st Sess. (1993) at 263.

licensees to make it easier for operators to expand their businesses. An auction is unnecessary in this context and would result in incumbents such as the Joint Commenters being unable to participate in geographic licensing.

WHEREFORE, Mobile Communications Service of Miami, Inc. respectfully requests that the Commission act in accordance with the views expressed herein.

I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

MOBILE COMMUNICATIONS SERVICE OF MIAMI, INC.

BY: _____

John F. Pedrotty
8193 N. W. 74th Avenue
Miami, Florida 33166

Date: February 24, 1995

WHEREFORE, Triangle Communications, Inc. respectfully requests that the Commission act in accordance with the views expressed herein.

I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

TRIANGLE COMMUNICATIONS, INC.

By: _____
Roy Smoker
940 West Main Street
New Holland, PA 17557

Date: February 24, 1995

WHEREFORE, California Trunking respectfully requests that the Commission act in accordance with the views expressed herein.

I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

CALIFORNIA TRUNKING

By: Will Shaw

Will Shaw
2226 Vista Valley Lane
Vista, CA 92084

Date: February 21, 1995

WHEREFORE, Bill Wayne d/b/a Mr. Radio respectfully requests that the Commission act in accordance with the views expressed herein.

I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

BILL WAYNE
d/b/a MR. RADIO

By: Bill Wayne

Bill Wayne
1738 Highway 95
Bullhead City, AZ 86442

Date: February 22, 1995

WHEREFORE, R.F. Communications respectfully requests that the Commission act in accordance with the views expressed herein.

I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully submitted,

R.F. COMMUNICATIONS

By: Bob Fetterman

Bob Fetterman
RR 2, Box 213
Catawissa, PA 17820-9614

Date: February 22, 1995