Gina Harrison
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: CC Docket No. 94-54 - Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Services; GN Docket No. 93-252 - Implementation of Sections 3(n) and 332 of the Communications Act; GN Docket No. 90-314 - Personal Communications Services; CC Docket No. 92-115 - Revision of Part 22 of the Commission's Rules Governing the Public Mobile Services; ET Docket No. 92-9 - Redevelopment of Spectrum to Encourage Innovation

Today, I met with Rosalind K. Allen, Chief, Commercial Radio Division of the Wireless Telecommunications Bureau, to discuss issues raised in CC Docket No. 94-54, including roaming, which are outlined in the attached summary. We also discussed issues relating to pre-grant construction and relocation of incumbent microwave users for PCS. Please associate this material with the above-referenced proceeding.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Attachment

cc: Rosalind K. Allen

Bringing Mobility to The Mass Market

L. R. Daniels

President, Pacific Bell Mobile Services

PACIFIC BELL
Mobile Services

LRD/mf 2/15/95

Industry Evolution For National Roaming Service May Not Be In The Public Interest

- Today, national roaming is only available on Cellular Analog networks
- Large cellular companies plan to combine PCS and Cellular spectrum to create "national networks"
- One potential PCS provider is also pursuing a "national network"
- At least three different PCS technologies - TDMA, CDMA, and GSM - are likely to be deployed
- Customers of independent PCS carriers (i.e.; Regional and Designated Entities) may be unable to access these national networks for technological or competitive reasons

A Broad Roaming Policy Should Be Adopted

- **Cooperative agreements among CMRS providers for roaming should be expected by the FCC whenever technically feasible**
- **To promote competition, the FCC should require that Cellular Carriers provide access to national analog roaming services on a fair and nondiscriminatory basis**

Interconnection

- **Wait to see market evolution**
- **Mandatory interconnection may increase operators' expenses**
- **Multiple connections between CMRS providers could reduce service quality**

Reseller Switch Unfair

- **Reseller switch unnecessary in highly competitive market**
- **MTA 30 MHz PCS providers are paying for spectrum**
- **Alters economics and is unfair to bidders**