Gina Harrison
Director
Federal Regulatory Relations

1275 Pennsylvania Avenue, N.W. Suite 400
Washington, D.C. 20004
(202) 383-6423

EX PARTE OR LATE FILED

PACIFIC TELESIS
Group-Washington

March 28, 1995

RECEIVED
MAR 28 1995

EX PARTE

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

FILE COPY ORIGINAL

Dear Mr. Caton:

Re: CC Docket No. 94-54 - Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Service; 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

Yesterday, Lyndon R. Daniels, Pacific Bell Mobile Services, Jim Tuthill, Senior Attorney, Pacific Bell and I met with Suzanne Tetreault, Assistant General Counsel and Peter A. Tenhula of the Office of General Counsel, to discuss issues outlined in the attached summary, as well as questions related to the necessity for a management agreement for PCS operations. In addition, Alan Ciamporcero, Executive Director, Pacific Telesis, Federal Regulatory Relations, Messrs. Daniels and Tuthill and I, met with Rudolfo M. Baca, Legal Advisor to Commissioner Quello; Mary P. McManus, Legal Advisor to Commissioner Susan Ness; Gregory Rosston of the Office of Plans and Policy; and Rosalind K. Allen, Chief, and David Furth, Deputy Chief, Commercial Radio Division, Wireless Bureau, to discuss the issues outlined in the attached summary. We also discussed issues concerning PCS pre-grant construction and the necessity for a management agreement for PCS operations with Ms. Allen and Mr. Furth. Please associate these materials 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.

No. of Copies rec'd 0+1
List A B C D E

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,

Attachments

cc: Rosalind K. Allen
Rudolfo M. Baca
David Furth
Mary P. McManus
Gregory Rosston
Peter A. Tenhula
Suzanne Tetreault

Bringing Mobility to The Mass Market

L. R. Daniels

President, Pacific Bell Mobile Services

PACIFIC BELL
Mobile Services

LRD/ml 3/22/95

PCS Will Be a Tougher Business To Enter And Compete In Than Most People Realize

- **Compete against established cellular providers**
- **More sites required than cellular**
- **Higher initial costs before reaching market**
- **More competition for site locations**
- **Microwave relocation issues**
- **Roaming arrangements needed**

Commission help will be necessary to assist PCS's launch

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 and PCS companies plan to create "national networks"**
  - **AT&T/McCaw: TDMA**
  - **Airtouch/Bell Atlantic: CDMA**
  - **Sprint: Potential GSM**
- **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

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

Microwave Relocation

- **A single microwave link can affect multiple PCS blocks**
  - **Existing microwave channel plan and PCS channel blocks cause a number of overlaps based on transmitted frequency**
  - **Not all incumbent microwave links follow the standard 80 MHz separation between transmit and receive frequencies**

Possible Microwave Relocation Cost Sharing Proposals - Interference Rights

- An FCC license has granted the user the right to transmit between two points and also grants the user protection from future interference. The interference rights are defined in Section 94.63 and require all future users to show that they will not cause harmful interference.

- This cost sharing proposal would separate the transmit rights from the interference rights and allow the PCS provider who pays for the incumbent's relocation to retain the interference rights. All PCS providers would have to consider these interference rights in their analyses as if the microwave link were still active.

Global System for Mobile Communications (GSM)

- Attacks on GSM are wrong and misleading
- Complaints in Europe about interference with hearing aids don't apply in the U.S. because
  - Reports in Europe were based on tests using mobile phones with up to 8W output power; in U.S., GSM phones will have maximum 1W peak
  - Most hearing aids in Europe are "behind the ear" type; in U.S., 99.9% are "in the canal" type with which there isn't interference
- Attacks are anti-competitively motivated