

operated within 50 meters of a highway toll plaza or rail siding.<sup>111/</sup> Once again, this would provide Part 15 devices with protections not required for a service restricted to secondary operation.

XI. Forward Links

UTC asks for height/power limits on narrowband forward links in the 927.250-929.00 MHz band to restrict interference with the 928-929 MHz Multiple Address System Band.<sup>112/</sup> The LMS narrowbands are in the 927.250-928.000 MHz band. Potential interference is controlled by the emission mask at the band edge. Thus, UTC's suggestion is unnecessary.

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<sup>111/</sup> Part 15 Coalition at 16-18.

<sup>112/</sup> UTC at 17-18.

XII. Conclusion

As SBMS demonstrated in its Petition, and again in this Opposition and Comments, the R&O requires substantial reconsideration and clarification. Time and again, the R&O opts for a decision reflecting a least common denominator among private competing interests rather than a reasoned analysis. The net result is an order which neither serves the public interest nor complies with requirements of law. Accordingly, SBMS respectfully requests reconsideration and clarification R&O and the rules adopted thereunder.

Respectfully submitted,

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May 24, 1995

CERTIFICATE OF SERVICE

I, Lilly A. Whitney, a secretary with the law firm of Gurman, Blask & Freedman, Chartered, hereby certify that copies of the foregoing "OPPOSITION AND COMMENTS OF SOUTHWESTERN BELL MOBILE SYSTEMS, INC. IN RESPONSE TO PETITIONS FOR RECONSIDERATION" were mailed by U.S. first class mail, postage prepaid, to the following:

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