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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Parts 2 and 90 of the)	PR Docket No. 89-553
Commission's Rules to Provide for the)	
Use of 200 Channels Outside the)	
Designated Filing Areas in the)	
896-901 MHz and the 935-940 MHz Bands)	
Allotted to the Specialized Mobile)	DOCKET FILE COPY ORIGINAL
Radio Pool)	
)	
Implementation of Section 309(j))	
of the Communications Act -)	PP Docket No. 93-253
Competitive Bidding)	
)	
Implementation of Sections 3(n) and 322)	GN Docket No. <u>93-252</u>
of the Communications Act)	
To: The Commission		

**COMMENTS
OF THE
PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION**

The Personal Communications Industry Association ("PCIA"),¹ pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. §1.415, respectfully submits its Comments in response to the

¹PCIA is an international trade association created by the merger of the National Association of Business and Educational Radio, Inc. ("NABER") and PCIA to represent the interests of both commercial mobile radio service (CMRS) and private mobile radio service (PMRS) users and businesses involved in all facets of the personal communications industry. PCIA's Federation of Councils include: the Paging and Narrowband PCS Alliance, the Broadband PCS Alliance, the Specialized Mobile Radio Alliance, the Site Owners and Managers Association, the Association of Wireless System Integrators, the Association of Communications Technicians, and the Private System Users Alliance. In addition, PCIA is the FCC-appointed frequency coordinator for the 450-512 MHz bands in the Business Radio Service, the 800 and 900 MHz Business Pools, 800 MHz General Category frequencies for Business eligibles and conventional SMR systems, and for the 929 MHz paging frequencies.

Commission's Second Report and Order and Second Notice Further Notice of Proposed Rule Making ("2nd R&O") in the above-captioned proceeding.²

In the 2nd R&O the Commission adopted service rules for 900 MHz "Phase II" licenses. In addition, the Commission proposed rules for allocation of the licenses to be issued for Phase II.

PCIA has reviewed the Commission's proposed auction methodology and does not at this time object to the Commission's proposal.³ However, PCIA wishes to review the Comments filed by other parties to determine whether any additional issues are presented which would warrant a review of PCIA's position.

²60 FR 22023 (May 4, 1995).

³PCIA does, however, object to certain aspects of the Report & Order portion of the Commission's action relating to 900 MHz SMR incumbent loading rules and MTA licensee construction requirements. PCIA intends to request reconsideration on these issues by the applicable filing date.

III. CONCLUSION

WHEREFORE, the Personal Communications Industries Association respectfully requests that the Commission act in accordance with the views expressed herein.

Respectfully submitted,

**PERSONAL COMMUNICATIONS
INDUSTRY ASSOCIATION**

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