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June 7, 1995

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JUN - 7 1995

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: FCC MM Docket No. 94-131 and PP Docket No. 93-253;
Notice of Proposed Rule Making to Amend Parts 21
and 74 of the Commission's Rules With Regard to
Filing Procedures in the Multipoint Distribution
Service and in the Instructional Television Fixed
Service and Implementation of Section 309(j) of
the Communications Act -- Competitive Bidding

SR Telecom, Inc.
Ex Parte Presentation

Dear Mr. Caton:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules
and Regulations, as adopted in the Report and Order in Gen.
Docket No. 86-225, 2 FCC Rcd. 3011 (1987), enclosed are copies of
the position paper distributed by SR Telecom Inc. in ex parte
meetings held on June 7, 1995 concerning the above-captioned
proceedings. We are providing this material on behalf of our
client, Mr. Ingvar Svanberg and Mr. Charles R. Geer of SR Telecom
Inc. who, along with myself of this firm, attended separate
meetings with, respectively:

- 1. Maureen O'Connell, Office of Commissioner James H. Quello;
2. Lisa B. Smith, Office of Commissioner Andrew C. Barrett.
3. Gerald Vaughn, Robert James and Jackie Chorney, Wireless Telecommunications Bureau; and
4. Bruce A. Franca, Office of Engineering and Technology.
5. Jonathan D. Levy, Office of Plans and Policy.

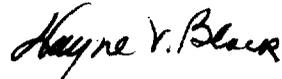
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William F. Caton, Acting Secretary  
June 7, 1995  
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KELLER AND HECKMAN

Kindly place this material in the public file. Should you have any comments or questions, please do not hesitate to contact the undersigned.

Cordially yours,



Wayne V. Black  
Attorney for  
SR Telecom Inc.

Enclosure

SR TELECOM INC.

FCC MM DOCKET NO. 94-131  
AND PP DOCKET NO. 93-253

ISSUES

- Time Division Multiple Access (TDMA) wireless loop technology provides a spectrum-efficient, valuable complement to other forms of voice and data telecommunications.
- SR Telecom urges the Commission to structure rules for the band 2500-2690 MHz that encourage the development of wireless loop systems nationwide.
- Assignments from the band 2500-2690 MHz should be structured to permit the use of up to four 6 MHz channels (two duplex pairs), with appropriate separation for wireless loop service.
- SR Telecom is concerned that the Commission's requirement contained in Section 21.907 that MDS licensees maintain video transmission capability may needlessly increase costs and stifle provision of wireless loop service and similar spectrum-efficient, new technologies.
- Restrictions against lessee interference are overly restrictive as they pertain to provision of wireless loop service.
- In light of the fact that wireless loop service is content-neutral, there is no need to protect the public from unauthorized reception. Therefore, SR Telecom requests that Section 21.903(b) be altered to permit wireless loop providers to operate without controlling all receiving facilities.