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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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**JUN 21 1995**

FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of )  
)  
Amendment of Section 2.106 of the )  
Commission's Rules To Allocate )  
Spectrum at 2 GHz for Use )  
by the Mobile-Satellite Service )

ET Docket No. 95-18  
RM-7927

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**REPLY COMMENTS OF THE  
PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION**

Mark J. Golden  
Robert L. Hoggarth  
Personal Communications Industry  
Association  
1019 19th Street, N.W., Suite 1100  
Washington, D.C. 20036  
(202) 467-4770

Katherine M. Holden  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 429-7000

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The Personal Communications Industry Association ("PCIA"),<sup>1</sup> by its attorneys, respectfully submits its reply comments in connection with the Commission's Notice of Proposed Rule Making in the above-captioned docket.<sup>2</sup> The *Notice* proposes "to allocate the 1990-2025 MHz (Earth-to-space) and 2165-2200 MHz (space-to-Earth)

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<sup>1</sup> PCIA and the National Association of Business and Educational Radio, Inc. ("NABER") recently completed the merger of their two organizations, and now operate under the PCIA name as a new legal entity. This new PCIA is an international trade association created to represent the interests of both the commercial and the private mobile radio service communications industries. PCIA's Federation of Councils includes: 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, as the FCC-appointed frequency coordinator for the 450-512 MHz bands in the Business Radio Service, the 800 and 900 MHz Business Pools, the 800 MHz General Category frequencies for Business Eligibles and conventional SMR systems, and the 929 MHz paging frequencies, PCIA represents and serves the interests of tens of thousands of licensees.

<sup>2</sup> FCC 95-39 (Jan. 31, 1995) ("*Notice*"); *Erratum* (Feb. 6, 1995); *Erratum* (Feb. 17, 1995). The reply comment date was set as June 21, 1995 by *Order Partially Granting Extension of Time*, DA 95-1190 (June 1, 1995).

bands to the mobile-satellite service (MSS),<sup>3</sup> as well as to apply the policies adopted in the emerging technologies proceeding for the reaccommodation of incumbent licensees in the subject bands.<sup>4</sup>

## I. SUMMARY

The pending *Notice* proposes to allocate 70 MHz of the remaining emerging technologies band to MSS. The Commission's *Notice* rejects prior proposals that the MSS allocation include 1970-1990 MHz, which is already allocated to personal communications service ("PCS"). PCIA concurs with the Commission that the 1970-1990 band should not be reallocated to MSS, either on an exclusive or shared basis.

In the *Notice*, the Commission also has proposed to apply its established emerging technologies transition policies to MSS. Such action is supported by existing licensees in the bands and opposed by several entities that contemplate seeking to provide MSS. PCIA supports equitable application of the relocation policy, whether in its current version or as it may be subsequently modified, to MSS operators. The objectors to such action have failed to demonstrate any sound reason for according special treatment to MSS licensees. Rather, the same balancing of competing factors that led the Commission to adopt the plan generally for emerging technologies and specifically for PCS mandates implementation of the same policy in MSS.

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<sup>3</sup> *Notice*, ¶ 1.

<sup>4</sup> *Id.*, ¶¶ 10-13.

In addition, the Commission should reject the baseless proposal made by TRW to shift responsibility for clearing the MSS bands from the direct beneficiaries of that step -- the MSS licensees -- to PCS operators. TRW's recommendation cannot be justified under any Commission policy.

Finally, PCIA urges the Commission to adopt for MSS a cost sharing mechanism similar to that which PCIA has proposed for the sharing of relocation costs by PCS licensees. Implementation of a similar approach for MSS operators, tailored to meet the particularized needs and circumstances of that service, will resolve the concerns of many of the commenting parties and will permit a fair and equitable assignment of relocation costs.

## II. BACKGROUND

The Commission's *Notice* responds in part to petitions for rulemaking filed by potential MSS providers that sought to allocate spectrum, *inter alia*, in the 1970-1990 MHz band, which already has been allocated by the Commission for PCS.<sup>5</sup> In addition, the *Notice* embodies the Commission's commitment in the PCS proceedings "to initiate a proceeding to investigate possibilities for allocating additional frequencies for MSS at 2 GHz."<sup>6</sup> Consistent with the previously adopted PCS allocations, the

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<sup>5</sup> Specifically, this spectrum falls within the C and F blocks of the PCS allocation, currently designated the "entrepreneurs' blocks."

<sup>6</sup> *Notice*, ¶ 2.

need for additional 2 GHz spectrum for MSS, and the Commission's planned recommendations for MSS allocations at WRC-95, the *Notice* proposes to make available 1990-2025 MHz and 2165-2200 MHz to MSS.

Although the Commission concluded that the anticipated usage of the PCS spectrum would be intensive and thus brought into question the feasibility of deploying MSS in the same band,<sup>7</sup> it did seek comments on "Celsat's proposal to share spectrum with PCS at 1970-1990 MHz in order to provide a hybrid PCS/MSS system."<sup>8</sup> None of the opening comments in response to the *Notice* argued in favor of an allocation of 1970-1990 MHz for either MSS or hybrid PCS/MSS. PCIA supports the Commission's recommendation not to allocate any frequencies from the PCS 1850-1990 MHz band to MSS. The record in this and other Commission proceedings makes clear that PCS and MSS cannot feasibly share spectrum without adversely affecting the provision of service to the public and the competitive nature of the marketplace.

The *Notice* further proposes the relocation of broadcast auxiliary service ("BAS") licensees from the 1990-2025 MHz band to the 2110-2145 MHz band, and common carrier fixed microwave and private fixed microwave licensees from the 2110-2145 MHz and 2165-2200 MHz bands. In connection with the relocation of the incumbent licensees, the Commission proposes to apply the involuntary relocation

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<sup>7</sup> *Id.*, ¶ 2.

<sup>8</sup> *Id.*, ¶ 16.

policy adopted in the emerging technologies proceeding.<sup>9</sup> In particular, the

Commission proposes that:

- All relocation expenses would be paid entirely by the displacing MSS provider. These expenses would include all engineering, equipment, and site costs and FCC fees, as well as any reasonable additional costs.
- Relocation facilities would be fully comparable to those being replaced.
- All activities necessary for placing the new facilities into operation, including engineering and frequency coordination, would be completed before relocation.
- The new communications system would be fully built and tested before the relocation could commence.
- Should the new facilities, within one year, prove not to be equivalent in every respect to the relocated facilities, the displacing MSS provider would pay to move the relocated operation to its original facilities until complete equivalency is attained.<sup>10</sup>

Comments filed by existing licensees in these bands or their representatives supported full application of the existing transition policies to the relocation of incumbents, with the costs to be borne by the MSS licensees.<sup>11</sup> Many of the potential applicants in the bands proposed for reallocation to MSS, however, generally oppose imposition of the

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<sup>9</sup> *Id.*, ¶ 11.

<sup>10</sup> *Id.*

<sup>11</sup> *See, e.g.*, Comments of the American Petroleum Institute ("API") at 13; Comments of the Association of Public-Safety Communications Officials-International, Inc. ("APCO") at 2-3; Comments of the Association of American Railroads ("AAR") at 4-5; Comments of UTC, The Telecommunications Association at 1-2; Comments of the Society of Broadcast Engineers, Inc. ("SBE") at 7-8; Joint Comments of the Association for Maximum Service Television, Inc. and Other Major Broadcasting Entities ("MSTV") at 7-8.

transition mechanism previously adopted by the Commission for implementation of new services in the emerging technologies band. Several parties urge the Commission to explore alternatives to the mass relocation of licensees from the 1990-2025 MHz, 2110-2145 MHz, and 2165-2200 MHz bands.<sup>12</sup> Commenting parties also argue, for several reasons, that MSS licenses should not be forced to bear all the costs of relocation.<sup>13</sup> Several parties voice particular concern that proper allocation of the relocation costs among MSS licensees and other users of the spectrum (*e.g.*, later authorized licensees or international MSS operators authorized by other countries) could prove virtually impossible to accomplish.<sup>14</sup>

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<sup>12</sup> *See, e.g.*, Comments of Constellation Communications, Inc. ("Constellation") at 3-4; Comments of Loral/QUALCOMM Partnership, L.P. ("Loral") at 14-16; Comments of TRW, Inc. ("TRW") at 11-13.

<sup>13</sup> *See, e.g.*, Comments of Loral at 16-20 (suggesting formation of a federal advisory committee to address appropriate transition/relocation plan); Comments of Personal Communications Satellite Corporation ("PCSAT") at 8-9; Comments of TRW at 3, 6-7, 10. TRW goes so far as to argue that not only should MSS providers not have to take financial responsibility for clearing the band to permit use by MSS, but that PCS licensees should pay the bulk of the relocation expenses, since PCS is one of the "principal beneficiaries" of the proposed relocations. Comments of TRW at ii, 3, 6, 9.

<sup>14</sup> *See, e.g.*, Comments of Loral at 12, 18-19; Comments of Motorola, Inc. ("Motorola") at 22; Comments of PCSAT at 8-9; Comments of TRW at ii, 13-16.

**III. RELOCATION OF INCUMBENT LICENSEES IN THE MSS AND OTHER AFFECTED BANDS SHOULD BE GOVERNED BY THE SAME POLICIES APPLIED TO OTHER EMERGING TECHNOLOGY USES IN THE 2 GHz BAND**

The Commission has previously adopted transition policies to be applied to the very bands under consideration pursuant to the subject *Notice* for the deployment of new services that would displace already licensed entities. These provisions for the relocation of existing licensees, in their current form and as subsequently modified, should be applied as well to the MSS allocation.<sup>15</sup> The objections raised by some of the opening comments provide no justifiable rationale for the Commission to depart from consistent application of its emerging technologies band policies.

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<sup>15</sup> The record reflects some question whether the relocation of BAS licensees and microwave licensees in fact is necessary. While some commenters have suggested that MSS cannot in any way share spectrum with such uses, other commenters have urged the Commission to explore more carefully this issue. Some of the parties argue in favor of examining technical means to permit spectrum sharing or to promote more efficient use of spectrum, with the result that incumbents may not need to be relocated or may be relocated to less spectrum than is currently required. To the extent that MSS can be deployed while minimizing relocation of existing licensees in any MSS-allocated bands, and at the same time maximizing service and technical flexibility, such options should be explored by potentially affected and interested parties.

**A. The Commission Has Adopted Relocation Policies Generally Applicable to the Emerging Technologies Band, Including Frequencies Proposed for Allocation to MSS**

In its emerging technologies proceeding,<sup>16</sup> the Commission allocated 1850-1990 MHz, 2110-2150 MHz, and 2160-2200 MHz "for the development and implementation of emerging technologies."<sup>17</sup> The Commission subsequently adopted "a plan that will provide for the fair and equitable sharing of 2 GHz spectrum by new services and the existing fixed microwave services that currently use these frequencies, and for the relocation of existing 2 GHz facilities to other spectrum where necessary."<sup>18</sup> The Commission emphasized the balance struck in making the allocation of spectrum to emerging technologies and in prescribing a transition plan:

The plan that we are adopting herein is intended to provide licensees of services using emerging technologies with access to 2 GHz frequencies in a reasonable timeframe, and at the same time prevent disruption to existing 2 GHz operations and minimize the economic impact on the existing licensees.<sup>19</sup>

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<sup>16</sup> In the Matter of Redevelopment of Spectrum To Encourage Innovation in the Use of New Telecommunications Technologies, 7 FCC Rcd 1542 (1992) (Notice of Proposed Rule Making); 7 FCC Rcd 6100 (1992) (Further Notice of Proposed Rule Making); 7 FCC Rcd 6886 (1992) (First Report and Order and Third Notice of Proposed Rule Making) ("*ET First Report and Order*"); 8 FCC Rcd 6495 (1993) (Second Report and Order); 8 FCC Rcd 6589 (1993) (Third Report and Order and Memorandum Opinion and Order) ("*ET Third Report and Order*"); 9 FCC Rcd 1943 (1994) (Memorandum Opinion and Order); 9 FCC Rcd 7797 (1994) (Second Memorandum Opinion and Order).

<sup>17</sup> *ET First Report and Order*, 7 FCC Rcd at 6890.

<sup>18</sup> *ET Third Report and Order*, 8 FCC Rcd at 6589.

<sup>19</sup> *Id.*

Under the rules adopted by the Commission to reflect the transition plan (Sections 21.50, 22.50, and 94.59 of the Commission's Rules), incumbent licensees in the frequency bands allocated for licensed emerging technologies have a two year voluntary negotiation period and a one year mandatory negotiation period.<sup>20</sup> In the bands allocated for unlicensed emerging technologies, the incumbents have a one year mandatory negotiation period. The emerging technology operator can seek mandatory relocation at the conclusion of the one year mandatory period so long as:

(1) The service applicant, provider, licensee, or representative using an emerging technology guarantees payment of all relocation costs, including all engineering, equipment, site and FCC fees, as well as any reasonable, additional costs that the relocated fixed microwave licensee might incur as a result of operation in another fixed microwave band or migration to another medium;

(2) The emerging technology service entity completes all activities necessary for implementing the replacement facilities, including engineering and cost analysis of the relocation procedure and, if radio facilities are used, identifying and obtaining, on the incumbents' behalf, new microwave frequencies and frequency coordination; and

(3) The emerging technology service entity builds the replacement system and tests it for comparability with the existing 2 GHz system.<sup>21</sup>

The incumbent microwave licensee need not relocate until it has a reasonable time to make adjustments, determine comparability, and ensure a seamless handoff to the

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<sup>20</sup> For public safety facilities, the relocation plan provides a three year voluntary negotiation period followed by a two year mandatory negotiation period.

<sup>21</sup> 47 C.F.R. § 21.50(c); 47 C.F.R. § 22.50(c); 47 C.F.R. § 94.59(c).

replacement facilities.<sup>22</sup> In addition, the incumbent licensee may return to its original facilities within one year if the replacement facilities are inadequate.<sup>23</sup>

The plan proposed by the Commission in the *Notice* comports with this existing and effective policy for balancing the diverse interests of emerging technologies operators and the pre-existing 2 GHz licensees.<sup>24</sup> Depending upon the record developed in this proceeding -- which to date suggests a longer deployment schedule than is the case with PCS -- the Commission will need to establish appropriate time frames for the length of the voluntary and mandatory negotiation periods applicable to MSS.

**B. MSS Use of 2 GHz Frequencies as Proposed in the *Notice* Should Be Governed by Consistent Application of the Emerging Technologies Transition Policies**

Most of the parties interested as potential providers of MSS in the subject bands object to the Commission's proposal to apply to them the same policies otherwise mandated for new users of the 2 GHz emerging technologies band.<sup>25</sup> Their offered

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<sup>22</sup> 47 C.F.R. § 21.50(d); 47 C.F.R. § 22.50(d); 47 C.F.R. § 94.59(d).

<sup>23</sup> 47 C.F.R. § 21.50(e); 47 C.F.R. § 22.50(e); 47 C.F.R. § 94.59(e).

<sup>24</sup> PCIA notes that the Commission's proposed frequencies and its contemplated relocation of BAS and microwave licensees has the effect of shifting the frequencies included within the emerging technology band. Nonetheless, the emerging technology policies should continue to apply to the frequencies proposed for allocation to MSS.

<sup>25</sup> Motorola, however, "generally agrees with the application of the clearing procedures employed in the emerging technologies docket in this proceeding," with the  
(continued...)

reasoning, however, ignores the Commission's considerations in adopting the emerging technologies transition policy and the underlying rationale.

The objections in large part are based on the fact that the relocation of existing licensees will cost MSS licensees substantial sums of money.<sup>26</sup> The costs of relocation, however, can be factored into the decision-making of potential MSS providers in deciding whether to seek an FCC license to provide service and at what cost. It certainly is not up to the Commission to assure that any and all licensees of radio spectrum will be profitable. Rather, the relocation costs necessarily must become one of the factors considered by potential applicants in their business plan evaluations.

Implicit in some of the objections to the Commission's proposal is the view that the existing licensees in the frequency bands somehow should bear the burden of relocating or deploying more spectrum efficient technologies in order to make way for MSS operations. This view runs counter to the Commission's balancing of equities that is as applicable to MSS as to the remainder of the emerging technologies band. Where the Commission is reassigning spectrum to the benefit of new operators, the already licensed entities should not be forced to carry the financial costs.

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<sup>25</sup>(...continued)

added conclusion that, "if non-MSS licensees would benefit from the relocation of BAS channels or paired microwave stations, then they too should bear their fair share of the costs of relocating incumbent users." Comments of Motorola at 22.

<sup>26</sup> Some of the commenters, as noted previously, express concerns about ensuring an equitable assignment of MSS operators of the relocation costs. That issue is addressed in the next section.

TRW makes the incredible argument that PCS operators should pay a substantial portion of the costs of relocation in the bands to be allocated for MSS. TRW reaches this conclusion on the basis that "the need for multiple relocations results primarily from the Commission's recent domestic allocation of the regional and global MSS allotment at 1970-1990 MHz to PCS,"<sup>27</sup> and its conclusion that "[u]nder the Commission's involuntary relocation policy, it is the initial displacing service provider that must pay the costs of relocating incumbent entities."<sup>28</sup> The absurdity of this argument is apparent on its face. The 1970-1990 MHz band, regardless of its international allocation, had never been allocated by the FCC for MSS. To claim that PCS operators should bear the financial burden of clearing existing spectrum to benefit TRW and other potential MSS providers simply has no basis in Commission policy or in rationality.

The objectors to the Commission's consistent application of the emerging technologies transition policies have shown no basis whatsoever for affording them exceptional treatment. MSS operators thus should bear the responsibility, to the extent necessary, for relocating existing BAS and microwave licensees as proposed in the *Notice*. This represents sound policy and provides an effective balancing of the diverse interests involved in using the 2 GHz frequencies.

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<sup>27</sup> Comments of TRW at 3.

<sup>28</sup> *Id.* at 9.

**IV. CONCERNS ABOUT ESTABLISHING EQUITABLE RESPONSIBILITY AMONG MSS LICENSEES FOR RELOCATION COSTS CAN BE ADDRESSED THROUGH A COST SHARING MECHANISM**

A number of parties raise legitimate concerns about the need for a mechanism to ensure that the costs of relocating existing licensees are assigned to MSS operators on an equitable basis. Questions arise because, for example, relocation of a particular incumbent might benefit more than one licensee. In addition, assuming that MSS spectrum can be licensed on a basis that permits subsequent entrants, then the first round of MSS licensees should not be expected to bear the full burden of the relocation efforts and the later entrants also should participate in funding those activities. Likewise, international providers of MSS authorized by other countries should be expected to contribute to the relocation efforts if they operate in this country.

While concerns about equitable assignment of relocation costs among MSS operators is raised as a justification for not applying the Commission's existing emerging technologies transition policies to MSS, they in fact argue in favor of developing a rational cost sharing mechanism.<sup>29</sup> PCIA has advocated the development of such a mechanism for the sharing of costs by PCS licensees in relocating microwave

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<sup>29</sup> See Comments of Motorola at 22.

licensees.<sup>30</sup> This mechanism is intended to address the same types of concerns as have been raised in the MSS context.

In comments recently filed on a petition for rulemaking filed by Pacific Bell Mobile Services regarding cost sharing for the relocation of microwave licensees in connection with PCS deployment,<sup>31</sup> PCIA recommended that the Commission adopt cost sharing rules premised on the following principles:

- Subject to certain simplifying limitations, cost sharing will be required when a PCS provider's system would have caused harmful interference to or received harmful interference from a co-channel microwave link's operations in the PCS provider's licensed frequency bands or service area borders, if not for the link's relocation.
- The costs to be shared will be determined on the basis of a formula taking into account the time the PCS licensee enters the market, amortization of the actual relocation expenses, and the number of PCS entities who benefit from the relocation, with a maximum cap of \$250,000 in costs per microwave link, plus \$150,000 for situations where it is necessary to build a new tower. Any costs above that amount must be absorbed by the relocating party.
- A non-profit clearinghouse will be established by the industry to collect relevant data and administer the cost sharing system.

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<sup>30</sup> See PCIA Petition for Partial Reconsideration, GEN Docket No. 90-314 (filed July 25, 1994); Comments on Petition for Partial Reconsideration of the Personal Communications Industry Association, GEN Docket No. 90-314 (filed Aug. 30, 1994); Reply Comments of the Personal Communications Industry Association, GEN Docket No. 90-314 (filed Sept. 9, 1994); Comments of the Personal Communications Industry Association, RM-8643 (filed June 15, 1995) ("*PCIA Cost Sharing Comments*").

<sup>31</sup> Petition for Rulemaking of Pacific Bell Mobile Services Regarding a Plan for Sharing the Costs of Microwave Relocation, RM-8643 (filed May 5, 1995). See FCC Public Notice, Rpt. No. 2073 (May 16, 1995).

- Cost sharing obligations will sunset ten years after the final PCS license is awarded by the FCC to further minimize administrative burdens.<sup>32</sup>

This model could easily be adapted for the MSS context, taking into account the valid differences between the PCS-related relocations and the MSS-related relocations. An appropriately designed mechanism should permit MSS licensees to act efficiently and effectively in relocating BAS and microwave licensees from the MSS bands, while ensuring that the costs associated with such moves are assigned on a fair and equitable basis to the MSS beneficiaries.

## V. CONCLUSION

PCIA supports the Commission's proposal not to allocate any of the existing PCS spectrum for use by MSS licensees. In addition, PCIA concurs with the Commission that the emerging technologies transition policies should be applied to MSS in a manner very similar to that adopted in the PCS context, and that MSS operators should bear the responsibility for relocating existing BAS and microwave licensees in the subject frequency bands. In no event should the Commission adopt the absurd recommendation put forward by TRW that PCS licensees should fund such relocation activities. Finally, the Commission should adopt a cost-sharing mechanism similar to that proposed by PCIA for the PCS-related relocations as a means for

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<sup>32</sup> *PCIA Cost Sharing Comments* at 4-5.

ensuring that all MSS operators bear an equitable share of the incumbent licensee relocation costs.

Respectfully submitted,

PERSONAL COMMUNICATIONS  
INDUSTRY ASSOCIATION

By: Mark J. Golden 

Mark J. Golden  
Robert L. Hogarth  
Personal Communications Industry  
Association  
1019 19th Street, N.W., Suite 1100  
Washington, D.C. 20036  
(202) 467-4770

By: Katherine M. Holden

Katherine M. Holden  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 429-7000

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