



EX PARTE OR LATE FILED

RECEIVED

AUG 28 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ORIGINAL  
FILE

August 28, 1992

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Amendment of the Commission's Rules to  
Establish New Personal Communications Service  
GEN Docket No. 90-314/ ET Docket No. 92-100

Dear Ms. Searcy:

On Friday, August 28, 1992, Michael S. Hirsch, Vice President Technology, Cellular Telecommunications Industry Association ("CTIA"), discussed the above-referenced proceeding with Mr. Thomas P. Stanley, Chief Engineer, Mr. David R. Siddall, Chief, Frequency Allocation Branch, and Mr. Paul L. Marrangoni, Electronics Engineer, all of the FCC's Office of Engineering and Technology. The substance of the meeting was a discussion of why cellular licensees should be eligible to hold PCS licenses at 1800 MHz.

In particular, CTIA noted that cellular providers must support millions of analog subscriber units, and therefore lack the full use of their 25 MHz allocation for PCS. CTIA also noted that limiting the amount of spectrum available to successful service providers is not in the public interest. In addition, CTIA noted that some wireless services may be more efficiently provided at 1800 MHz, and that cellular carriers should be eligible to provide these services at the most efficient frequency. Finally, CTIA noted that cellular carriers should be eligible for new spectrum in order to most efficiently deploy wideband technologies.

Sincerely,

  
Michael Altschul  
General Counsel

cc: Thomas P. Stanley

Cellular Telecommunications Industry Association

1133 21st St. N.W., Third Floor, Washington, D.C. 20036 • (202) 785-0081 • FAX (202) 785-0721



recycled paper