



201 E. Fourth St.
P.O. Box 2301
Cincinnati, Ohio 45201-2301

December 8, 1995

RECEIVED

DEC 8 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

In the Matter of:

The Commission's Rules to Establish
New Personal Commissions Services

)
)
)

Gen. Docket No. 90-314
RM-7140, RM-7175, RM-7618

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Enclosed are an original and nine copies of the Petition to Implement Mandate of United States Circuit Court of Appeals for the Sixth Circuit ("Petition") of Cincinnati Bell Telephone in the above referenced proceeding. A duplicate original copy of this letter and attached Petition is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding this Petition may be directed to Ms. Amy Collins at the above address or by telephone on (513) 397-1333.

Sincerely,

Peggy A. Peckham
Director - Legislative &
Regulatory Planning

c: International Transcription Services

No. of Copies rec'd 009
List ABCDE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

RECEIVED

DEC 8 1995

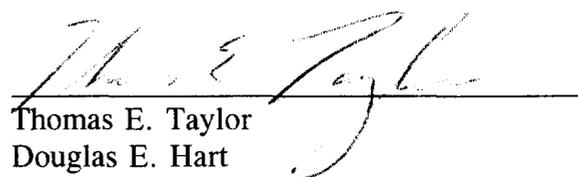
In the Matter of Amendment of the) GEN Docket No. 90-314
Commission's Rules to Establish New) RM-7140, RM-7175, RM-7618
Personal Communications Services)

DOCKET FILE COPY ORIGINAL

**PETITION TO IMPLEMENT MANDATE OF UNITED STATES
CIRCUIT COURT OF APPEALS FOR THE SIXTH CIRCUIT**

Cincinnati Bell Telephone Company ("CBT") hereby petitions the Commission to implement the mandate of Cincinnati Bell Telephone Co. v. FCC, Case No. 94-3701/4113 (6th Cir. Nov. 9, 1995). CBT requests that the Commission adopt appropriate rule amendments consistent with the Court's decision and then take such steps as are necessary to afford CBT the same opportunity to participate in PCS as it would have had in absence of the arbitrary cellular attribution rules.

Respectfully submitted,


Thomas E. Taylor
Douglas E. Hart
FROST & JACOBS
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202
(513) 651-6800

MEMORANDUM IN SUPPORT

On June 28, 1990 the Commission released a Notice of Inquiry¹ initiating its investigation of personal communications services ("PCS"). In the Second Report and Order in this docket,² the Commission promulgated eligibility rules for owners of cellular interests to participate in PCS licensing. One of those rules was 47 C.F.R. § 24.204(d)(ii), which treated a partnership or stock interest amounting to twenty percent or more of the equity of a cellular licensee as an attributable interest, such that the owner of that interest would be ineligible for a 30 MHz PCS license. Because one of its affiliated entities is an owner of such a limited partnership interest in a cellular partnership, that rule rendered CBT ineligible for the 30 MHz licenses in the Cincinnati MTA.

On December 8, 1993, CBT participated in a Joint Petition for Reconsideration,³ requesting the Commission to reconsider the attribution rules. CBT asked the Commission to amend the rule so as to exclude from attribution minority partnership and stock interests where a single separate entity held a majority controlling interest in the cellular licensee. The Commission rejected this suggestion, instead affirming the eligibility restrictions adopted earlier.⁴

¹ Notice of Inquiry, GEN Docket No. 90-314, 5 FCC Rcd 3995 (1990).

² Second Report and Order, (FCC 93-451), adopted September 23, 1993, released October 22, 1993, 8 FCC Rcd 7700 (1993).

³ Petition for Reconsideration of Chickasaw Telephone Company, Cincinnati Bell Telephone Company, Illinois Consolidated Telephone Company, Millington Telephone Company and Roseville Telephone Company, GEN Docket No. 90-314, filed December 8, 1993.

⁴ Memorandum Opinion and Order (FCC 94-144), GEN Docket No. 90-314, adopted June 9, 1994, released June 13, 1994, 9 FCC Rcd 4957 (1994).

CBT filed a Petition for Review of the Commission's June 9, 1994 Memorandum Opinion and Order with the Sixth Circuit on July 1, 1994. While the appellate proceedings were pending, CBT simultaneously filed a request for waiver of the cellular attribution rule and a Motion for Stay of the A and B Block auctions with the Commission on July 21, 1994. CBT asked the Commission to waive Section 24.204 to permit CBT to bid on and obtain the same amount of broadband PCS spectrum as an entity having no attributable cellular interests. The basis for the waiver request was that CBT had absolutely no control over the cellular partnership such that application of the cellular attribution rule to CBT served no legitimate purpose. The Commission did not act on CBT's request for waiver until November 3, 1994, after the October 28, 1994 deadline for registration for the A and B Block auction. Even then, the Commission did not waive the attribution rule for CBT but, rather, merely extended the length of time CBT would have in which to divest itself of an attributable cellular interest. The ruling on the waiver request would not have allowed CBT to obtain an interest in a 30 MHz PCS license and keep its present cellular interest. In the meantime, the Commission also had issued the Third Memorandum Opinion and Order,⁵ which amended the eligibility rules to allow a minority cellular owner to bid upon a 30 MHz PCS license conditioned upon a commitment to divest itself of the cellular interest within ninety days.⁶

⁵ Third Memorandum Opinion and Order, (FCC 94-265), adopted and released October 19, 1994, published November 7, 1994.

⁶ CBT filed a separate Petition for Review of this Order with the Sixth Circuit Court of Appeals on January 6, 1995. This Petition was consolidated with the earlier filed Petition for Review of the June 9, 1994 Order.

The Commission never acted upon CBT's Motion for Stay. The A and B Block auctions went forward beginning December 5, 1994, even while CBT's challenge to the eligibility rules was pending in the Court of Appeals and its stay request was pending before the Commission. The A and B Block auctions thus were conducted under a cloud, with full notice to all participants that the eligibility rules under which the auction was being conducted might be invalid. Such bidders went forward at their own peril with the risk that the auction results would be invalid.

On November 9, 1995, the Sixth Circuit Court of Appeals granted CBT's Petition for Review, declaring that the cellular attribution rule was arbitrary and capricious.⁷ CBT suggests that the Commission correct the cellular attribution rule by adopting the following addition to 47 C.F.R. § 24.204(d)(ii), in addition to any other parallel changes to Commission rules necessary to render the rules consistent with the Sixth Circuit's opinion:

No minority stock or limited partnership interest will be attributable if a single holder (or group of affiliated holders) owns more than 50% of the outstanding stock or partnership equity or has voting control of the licensee's affairs.

CBT believes that this rule would address its objections to the Commission's earlier rulemakings and remove the arbitrary treatment the earlier attribution rule afforded CBT. CBT urges the Commission to implement such rule as soon as possible⁸ and then establish a

⁷ Cincinnati Bell Telephone Co. v. FCC, Case No. 94-3701/4113 (6th Cir. Nov. 9, 1995). A copy of the Mandate, issued December 1, 1995, is attached hereto as Exhibit A.

⁸ Since the rule suggested above is fully supported by the record in this proceeding, there is no need to conduct further rulemaking proceedings on this matter.

procedure by which those licenses in areas where parties were adversely affected by the old attribution rule would be reassigned in accordance with proper eligibility rules.

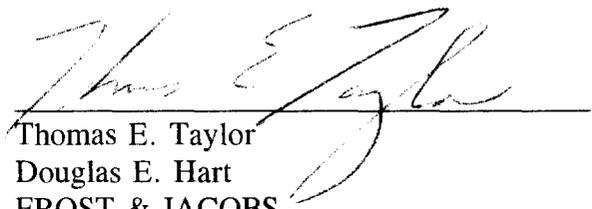
The Commission's stated reason for the cellular attribution rule was to promote competition. However, in CBT's case, the now vacated rule would have had exactly the opposite effect. Due to Ameritech's complete control over the cellular partnership, CBT has absolutely no ability to use or control any cellular bandwidth, even though the rule would charge it with control of the entire 25 MHz. At the same time, Ameritech is seeking a waiver of the Commission's rules that would permit it to provide local exchange service bundled with wireless service in the Cincinnati market.⁹ AT&T, the high bidder for one of the 30 MHz PCS licenses for Cincinnati, also has made no secret that it one day intends to re-enter the local exchange business. These companies and others would have the opportunity to bundle wireline and wireless services and offer their customers "one-stop shopping." Because CBT, on the other hand, has no control over any cellular bandwidth and would be precluded from acquiring a 30 MHz PCS license, it could not have this capability. The Commission should adopt CBT's proposed rule because it would increase the competitiveness of the telecommunications market and not unduly restrict some competitors in favor of others.

Now that the Sixth Circuit has declared the eligibility rules invalid for the very reason that the rules had excluded CBT from the auction, the auction results are patently defective. CBT was not allowed to participate in the auction as it would have been allowed had the

⁹ See Petition of Ameritech Communications, Inc. for Partial Waiver of Section 22.903 of the Commission's Rules, DA 95-2198, filed October 11, 1995.

Commission heeded CBT's warnings and either adopted the rule proposed by CBT, granted CBT's request for a waiver of the cellular attribution rules, or stayed the auction. It is time for the Commission to correct the defects in the rules and fashion sufficient relief to restore CBT to the status it held before it was arbitrarily excluded from the bidding pool. In conjunction with correction of the defective attribution rule, the Commission should issue a moratorium on further construction of PCS service facilities or the exercise of PCS licenses in the Cincinnati MTA until such time as the rules are corrected and the validity of licensing confirmed. CBT should be allowed a sufficient time to consider its options under proper eligibility rules.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas E. Taylor", is written over a horizontal line.

Thomas E. Taylor
Douglas E. Hart
FROST & JACOBS
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202
(513) 651-6800

LEONARD GREEN
CLERK

FOR THE SIXTH CIRCUIT
100 EAST FIFTH STREET, ROOM 532
POTTER STEWART U.S. COURTHOUSE
CINCINNATI, OHIO 45202-3988

TELEPHONE
(513)684-2953

Valerie Fields
Direct Dial: 513-357-5582

Filed: December 1, 1995

John E. Ingle
Douglas E. Hart
James M. Carr
Robert J. Wiggers
William B. Barfield
Joseph Di Bella
Ashton R. Hardy
Michael K. Kellogg
Alan Lescht
John H. Pickering
Joel Marcus
Frank W. Krogh
David Cosson
David W. Carpenter
Robert B. McKenna
John F. Beasley
Craig E. Gilmore
Robert G. Kirk
Michael D. Sullivan
L. Andrew Tollin

EXHIBIT A
Page 1 of 2

RE: 94-3701; 94-4113; 95-3023; 95-3238; 95-3315
Cinti Bell Tele Co vs. FCC
District Court No. FCC 94-144

The mandate issued in the above-styled case.

Please be advised that the certified record was never sent to this Court on appeal. Pursuant to the court's instructions the mandate will issue today.

Leonard Green, Clerk

(Ms.) Valerie Fields
Deputy Clerk

Nos: 94-3701/4113; 95-3023/3238/3315

NOV - 9 1995

LEONARD GREEN, Clerk

EXHIBIT A
Page 2 of 2

CINCINNATI BELL TELEPHONE COMPANY (94-3701; 95-3023);
BELLSOUTH CORPORATION; BELLSOUTH TELECOMMUNICATIONS,
INC.; BELLSOUTH ENTERPRISES, INC. (94-4113; 95-3315);
RADIOFONE, INC. (95-3238),
Petitioners,

UNITED STATES TELEPHONE ASSOCIATION; U.S. WEST, INC.;
NEW YORK TELEPHONE COMPANY; NEW ENGLAND TELEPHONE AND
TELEGRAPH COMPANY; RADIOFONE, INC.,
Intervenors,

v.

FEDERAL COMMUNICATIONS COMMISSION; UNITED STATES OF AMERICA,
Respondents,

PACIFIC BELL; NEVADA BELL; MCI TELECOMMUNICATIONS
CORPORATION; AT&T CORPORATION; US WEST, INC.,
Intervenors.

Before: **Martin and Batchelder**, Circuit Judges;
Edmunds, District Judge.

JUDGMENT

THIS MATTER came before the court upon a petition for review of an order of the Federal Communications Commission.

UPON FULL REVIEW of the records and the briefs and arguments by counsel,

IT IS ORDERED that the petitions of Cincinnati Bell Telephone Company, Radiofone, and BellSouth be GRANTED and the matter is remanded to the Federal Communications Commission for further proceedings in accordance with the opinion.

ENTERED BY ORDER OF THE COURT

Leonard Green, Jr.

Leonard Green, Clerk

Issued as Mandate: *December 1 - 1995*

A True Copy.

COSTS: *NONE*

Attest:

Filing Fee\$
Printing\$
Total\$

Valerie Field

Deputy Clerk

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petition to Implement Mandate was served by first class mail, postage prepaid, upon the parties listed below this ~~8th~~ day of December, 1995.



William E. Kennard
General Counsel Office
Federal Communications Comm.
1919 M Street, NW, Rm 614
Washington, DC 20554

Robert J. Wiggers
U.S. Dept. of Justice
9th & Pennsylvania Ave, Rm 3224
Washington, DC 20530
International Transcription Service
1919 M Street, NW, Rm 246
Washington, D. C. 20554

William Caton, Acting Secretary
Federal Communications
Commission
1919 M Street, NW, Rm 222
Washington, DC 20554

Chairman Reed Hundt
Federal Communications
Commission
1919 M Street, NW, Rm 814
Washington, DC 20554

Commissioner James H. Quello
Federal Communications
Commission
1919 M Street, NW, Rm 802
Washington, DC 20554

Commissioner Andrew C. Barrett
Federal Communications
Commission
1919 M Street, NW, Rm 826
Washington, DC 20554

Commissioner Rachele Chong
Federal Communications
Commission
1919 M Street, NW, Rm 832
Washington, DC 20554

Commissioner Susan Ness
Federal Communications
Commission
1919 M Street, NW, Rm 832
Washington, DC 20554

Judy Nitsche, Chief
Tariff Review Branch, FCC
1919 M Street, NW, Rm 518
Washington, DC 20554

Dr. Thomas P. Stanley, Eng. &
Tech.
Federal Communications
Commission
2025 M Street, NW, Rm 7002
Washington, D.C. 20554

H. Franklin Wright
Frequency Liaison Branch
Federal Communications
Commission
2025 M Street, NW, Rm 7326
Washington, DC 20554

Steve Funkhouser
Tariff Review Branch, FCC
1919 M Street, NW, Rm 518
Washington, DC 20554

Paul Rodgers, General Counsel
NARUC
1102 ICC Building, Box 684
Washington, DC 20044

Michael S. Slomin, Atty
Bellcore
290 W. Mt. Pleasant Ave
Livingston, NJ 07039

William J. Cole, Pres.
Cobra Electronics Group
Dynascan Corporation
6500 West Cortland Street
Chicago, IL 60635

Mark J. Golden
Telocator
1019 19th St. NW, Suite 1100
Washington, DC 20036

F. Thomas Tuttle, Atty
Hughes Network Systems, Inc.
1615 M Street, NW, Suite 700
Washington, DC 20036

William J. Cowan
General Counsel
NY State Department/Public
Service
Three Empire State Plaza
Albany, NY 12223

Blooston, Mordkofsky, Atty.
Century Cellunet, Inc.
2120 L Street, NW
Washington, DC 20037

Pete Wanzenreid, Asst. Chief
State of California, Gen. Svc.
601 Sequoia Pacific Blvd.
Sacramento, CA 95814-0282

Marci E. Greenstein, Atty.
Alliance of Rural Local Exchange
1819 H Street, NW, 7th Floor
Washington, DC 20006

Linda T. Muir, Counsel
Contel Corporation
24 S Perimeter Center Pkwy, NE
Atlanta, GA 30346

Mara J. Primosch, Atty.
Utilities Tele. Council
1140 Connecticut Ave, NW
Suite 1140
Washington, DC 20036

George Y. Wheeler
Koteen & Naftalin, Atty.
Telephone Data Systems, Inc
1150 Connecticut Ave, NW
Washington, DC 20554

Margaret B. Brown
Pacific Telesis
1275 Pennsylvania Ave, NW
Washington, DC 20004

John E. McNulty
President and CEO
Rose Communications Inc.
3064 Scott Blvd.
Santa Clara, CA 95054-3325

Francine J. Berry, Atty
AT&T
295 North Maple Ave. Rm 3244Jl
Basking Ridge, NJ 07920

Paul R. Rodriguez, Atty.
British Telecommunications
2000 K Street, N.W. Suite 600
Washington, D.C. 20006-1809

William B. Barfield
BellSouth Corporation
1155 Peachtree Street, NE
Suite 1800
Atlanta, GA 30367-6000

Scott J. Loftness, S.V. Pres.
Fidelity Investments
82 Devonshire Street
Boston, MA 02109

Judith St. Ledger
Paging Network Inc.
1200 18th Street, NW
Washington, D.C. 20036

Henry L. Baumann, E.V. Pres.
1771 N Street, N.W.
Washington, D.C. 20036

Lukas, McGowan, Nace &
Gutierrez
MTEL PCN, INC.
1111 19th Street, NW,
Washington, DC 20036

John W. Pettit, Atty
Tandy Corporation
901 15th St., NW, Suite 900
Washington, DC 20006

Bruce D. Jacobs, Atty.
American Mobile Satellite Corp.
1255 23rd Street, NW, Suite 800
Washington, D.C. 20037

Lukas, McGowan, Nace &
Gutierrez
Kitsap Cellular, Inc.
1111 19th Street, NW,
Washington, D.C. 20036

Dennis L. Hill, Manager
Northwest Iowa Power Coop.
P.O. Box 240
Le Mars, Iowa 51031

Michael F. Altschul
Cellular Tele. Industry Assoc.
1133 21st Street, NW, Suite 300
Washington, DC 20036

Sam Antar, Vice Pres.
Capital Cities/ABC, Inc.
77 West 66th Street
New York, NY 10023

McNair Law Firm, P.A.
Rock Hill; Fort Mill; Lancaster
Tele.
1155 Fifteenth Street, N.W.
Washington, D.C. 20005

Gurman, Kurtis, Blask & Freedman
Mobile Satellite Corp.
1400 16th St., NW, Suite 500
Washington, D.C. 20036

Christopher D. Imlay, Atty
American Radio Relay League, Inc.
1920 N Street, NW, Suite 150
Washington, D.C. 20036

Squire, Sanders & Dempsey, Atty
County of Los Angeles California
1201 Pennsylvania Ave. NW
P.O. Box 407
Washington, D.C. 20044

David Cosson, Atty
National Telephone Coop. Assoc.
2626 Pennsylvania Avenue, N.W.
Washington, DC 20037

Ellen S. LeVine, Atty.
People and PUC/State of California
505 Van Ness Avenue
San Francisco, CA 94102

David A. LaFuria, Atty.
Rural Area Cellular Devel. Group
1819 H. Street, NW, 7th Fl
Washington, DC 20006

Dow, Lohnes & Albertson, Atty.
1255 23rd Street, NW, Suite 500
H&C Communications, Inc.
Washington, DC 20037

Swidler & Berlin
Local Area Telecom., Inc.
3000 K Street, NW, Suite 300
Washington, DC 20007

Goodman, Todd, Katz, Atty.
Bell Atlantic Companies
1710 H Street, N.W.
Washington, DC 20006

Albert Halprin, Atty.
Northern Telecomm Inc.
1301 K Street, N.W.
Washington, DC 20005

Leonard Robert Raish
Digital Microwave Corp.
1300 North 17th Street, 11th Floor
Roslyn, VA 22209

William H. Talmage, Esq.
NCR Corporation
1700 S. Patterson Blvd.
Dayton, Ohio 45479

Wayne V. Black, Atty.
Spec. Industrial Radio Svc.
1150 17th Street, NW, Suite 1000
Washington, DC 20036

Henry Goldberg, Atty.
Apple Computer, Inc.
1229 19th Street, N.W.
Washington, DC 20036

Michael C. Trahos D.O.
4600 King Street, Suite 4E
Alexandria, VA 22302

David E. Weisman, Esq.
Nat'l Assoc. Bus., Educat. Radio
4400 Jennifer St., NW, Suite 380
Washington, DC 20015

Arent, Fox, Plotkin & Kahn
Radio Telecom and Tech., Inc.
1050 Connecticut Ave., NW
Washington, DC 20036-5339

Kevin J. Kelley
Qualcomm, Inc.
1233 20th Street, NW, Suite 202
Washington, DC 20036

John D. Lane, Atty.
Assoc. Public Safety Comm. Ofc.,
Inc.
1666 K Street, NW, Suite 1100
Washington, DC 20006-2866

James F. Lovette
Apple Computer, Inc.
One Infinite Loop: MS:301-4J
Cupertino, CA 95014

Russell H. Fox, Pres.
American SMR Network Assoc.,
Inc.
1835 K Street, NW, Suite 203
Washington, DC 20006

James A. Dwyer, Jr.
2100 Electronics Lane
Fort Myers, Florida 33912

David L. Hill, Atty.
1919 Pennsylvania Ave NW, Suite
800
Washington, DC 20006

Kurt A. Wimmer, Atty.
American Personal Comm.
P.O. Box 7566
1201 Pennsylvania Ave., N.W.
Washington, D.C. 20044

Ted V. Lennick, Gen. Mgr.
Cooperative Power Association
14615 Lone Oak Road
Eden Prairie, MN 55344-2287

Charles F. Wright, V. Pres.
Centel Corporation
8725 Higgins Road
Chicago, Illinois 60631

McNair Law Firm, P.A.
South Carolina Tele. Assoc.
1155 Fifteenth Street, N.W.
Washington, DC 20005

Christopher D. Imlay, Atty.
Puerto Rico Assoc. of Broad.
1920 N Street, NW, Suite 150
Washington, DC 20036

William L. Fishman, Atty.
France Telecom
1025 Connecticut Avenue, NW
Washington, DC 20036

Lisa M. Zaina, Counsel
OPASTCO
21 Dupont Circle, NW, Suite 700
Washington, DC 20036

John E. Hoover, Atty
MPB Corp - Precision Park
P.O. Box 547
Keene, NH 03431-0547

Keith G. Galitz
U.S. West, Inc.
1020 19th Street, NW, Suite 700
Washington, DC 20036

Linda Kent, Atty.
U S Telephone Association
1401 H St., NW, Suite 600
Washington, DC 20005

Josephine S. Trubek
Rochester Telephone Corporation
180 S. Clinton Avenue
Rochester, NY 14646-0700

Linda D. Hershman, VP
South. New England Telecom.
Corp.
227 Church Street
New Haven, CT 06510

Robert N. Reiland
Ameritech
30 South Wacker Dr, Suite 3900
Chicago, IL 60606

Mark P. Royer
Southwestern Bell Corp.
One Bell Center, Rm 3524
St. Louis, MO 63101

Mark R. Hamilton, Esq.
McCaw Cellular Commun., Inc.
5400 Canillon Point
Kirkland, WA 98033

Larry A. Blosser
MCI Communications Corporation
1801 Pennsylvania Ave., NW
Washington, DC 20006

Michael D. Kennedy, Dir.
Motorola Inc.
1350 I Street, NW, Suite 400
Washington, DC 20005

Laura C. Mow, Atty.
Hunter & Mow
1620 I Street, NW, Suite 701
Washington, DC 20006

Gene H. Kuhn, Dir.
Union/Missouri Pac. Railroad Co.
1416 Dodge Street
Omaha, NE 68179

Paul Taft, Pres.
Taft Broadcasting Company
4808 San Felipe Road
Houston, Texas 77056

William D. Balthrope, Pres.
Texas Wired Music, Inc.
P.O. Box 8278
San Antonio, Texas 78208

David C. Jatlow, Atty.
Ericsson Corporation
2300 N Street, N.W., Suite 600
Washington, DC 20037

Lawrence R. Krevor, Esq.
Fleet Call, Inc.
1450 G Street, NW
Washington, DC 20005

Daniel L. Bart
GTE Service Corporation
1850 M Street, NW, Suite 1200
Washington, DC 20036

Hollis G. Duensing, Atty.
Association of American Railroads
50 F Street, NW
Washington, DC 20001

Thomas E. Martinson, VP
PCN America, Inc.
153 East 53rd St., Suite 2500
New York, New York 10022

Charles T. Foree, Admin.
National Aeronautical and Space
Administration
Washington, D.C. 20546

Daryl L. Avery, Atty,
Public Service Commission of DC
450 Fifth Street, NW
Washington, D.C. 20001

John D. Lane, Atty.
Los Angeles County Sheriff Dept.
1666 K Street, NW, Suite 1100
Washington, D.C. 20006-2866

Lynn Diebold, Dir.
Ca. Public-Safety Radio Assoc.
California Highway Patrol
4016 Rosewood Avenue
Los Angeles, CA 90004

Werner K. Hartenberger, Atty.
Cox Enterprises, Inc.
1255 23rd Street, NW, Suite 500
Washington, D.C. 20037

Chandos A. Rypinski
Local Area Communication
Equipment, Inc.
655 Redwood Highway, #340
Mill Valley, CA 94941

Eric Schimmel, VP
Telecomm. Industry Assoc.
2001 Pennsylvania Ave, NW, 800
Washington, DC 20006-1813

Brennan, Ayling, McDermott
NYNEX Corporation
120 Bloomingdale Road
White Plains, NY 10605

C.J. Cant, Dir.
Ferranti Creditphone Ltd.
9 High Street
Fareham, Hampshire P016 7AN

James R. Haynes, Eng.
Uniden America Corporation
4700 Amon Carter Blvd.
Fort Worth, TX 76155

Michael P. Terry, Representative
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Thomas J. Casey, Atty.
Cellular Communications, Inc.
1440 New York Avenue, N.W.
Washington, D.C. 20005

Mohamed Lyzzaik, Eng.
United Power, Inc.
P.O. Box 929
Brighton, CO 80601

Steve Brohard
GTE Telephone Operations
600 Hidden Ridge HQ02G26
P.O. Box 152092
Irving, TX 75038

Bob Butch
Southern New England Telephone
227 Church Street - 4th Floor
New Haven, CT 06510

Jim Butman
Telephone & Data Systems
301 S. Westfield Rd.
Madison, WI 53705

Julian Griffin
Sprint/United
2330 Shawnee Mission Pkwy.
Westwood, KS 66205

Kyle Griffin
Lincoln Telephone Co.
1440 M Street
Lincoln, NE 68501

Jerry Kephart
Bellsouth Telecommun.
675 W. Peachtree St, Rm 38L64
Atlanta, GA 30375

Sophie Kogut
US West Communications
1005 17th St., Suite 1750
Denver, CO 80202

Roger Kohles
Lincoln Telephone Co.
1440 M Street
Lincoln, NE 68501

Jack Roach, Vice President
Operational Support
ALLTEL Telephone Services Corp.
One Allied Drive
P.O. Box 2177
Little Rock, Arkansas 72203

Mike Robinson
Lufkin-Conroe Tel Exchange
321 N. 1st Street
Lufkin, TX 75902

Larrie Sutliff
Bellcore
290 W Mt. Pleasant Ave.
Room 2B230
Livingston, NJ 07039

Frank Panek, Atty
Ameritech
2000 W. Ameritech Way, Rm
2F33C
Hoffman Estates, IL 60196

Darrell S. Townsley
Illinois Commerce Commission
160 North LaSalle St, Suite C-800
Chicago, Illinois 60601

John W. Hunter, Atty.
Palmettor Rural Tele. Coop., Inc.
1155 Fifteenth Street, N.W.
Washington, D.C. 20005

Roger A. Strauch
Teknekron Communications
Systems
2121 Allston Way
Berkeley, CA 94704

Jeffrey L. Clarke
American Gas Association
1515 Wilson Boulevard
Arlington, VA 22209

Robert M. Jackson, Atty.
Kerrville Telephone Co.
2120 L Street, N.W.
Washington, D.C. 20037

Shannon Fitzsimmons
Assoc. Public-Safety Commun. Ofc.
Arizona Chapter
P.O. Box 3413
Phoenix, Arizona 85030-3413

Robert M. Jackson, Atty.
Harrisonville Telephone Co.
2120 L Street, NW
Washington, DC 20037

Robert M. Curss, Atty.
Public Safety Microwave Comm.
1666 K Street, N.W.
Washington, D.C. 20006

Robert F. Aldrich
Keck, Mahin & Cate
1201 New York Ave., NW,
Penthouse
Washington, DC 20005

John W. Hunter
McNair Law Firm, P.A.
Home Telephone Co.
1155 Fifteenth Street, NW
Washington, DC 20005

Edward Schor
Viacom International Inc.
1515 Broadway
New York, New York 10036

Phyllis A. Whitten
Sprint
1850 M Street, NW, Suite 1110
Washington, DC 20036

Dow, Lohnes & Albertson
Vanguard Cellular Systems, Inc.
1255 Twenty-third St., NW
Suite 500
Washington, DC 20037

James Gunn
Andrew Corporation
1850 North Greenville, Suite 100
Richardson, TX 75081

Alden F. Abbott
NTIA
US Dept of Commerce, Rm 4713
14th and Constitution Ave, NW
Washington, DC 20230

Carl Wayne Smith
Defense Information Systems
Agency
701 S. Courthouse Road
Arlington, Virginia 22204

Michael W. Medin
Hitachi Telecom (USA), Inc.
2990 Gateway Drive
Norcross, GA 30071

Michael S. Varda, Esq.
Public Service Comm. of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

John W. Hunter, Atty
McNair Law Firm, P.A.
Piedmont/West Carolina/Farmers
Tele. Coop.
1155 Fifteenth Street, N.W.
Washington, DC 20005

Ellen M. Averett
Pennsylvania Public Utility
Commission
P.O. Box 3265
G-28 North Office Building
Harrisburg, PA 17105-3265

Stephen Kaffee, P.C.,
Atty. for PDM/PCS
1920 N Street, NW, Suite 660
Washington, D.C. 20036

Ellen S. Deutsch
Citizens Utilities of California
P.O. Box 496020
1035 Placer Street
Reading, CA 96049-6020

Dinah D. McElfresh
Electro. Energy Policy Alliance
1255 23rd St., NW, Suite 850
Washington, DC 20037-1174

Brice L. Clark
Hewlett-Packard Company
8000 Foothills Blvd.
Roseville, CA 95678

Gregg Ehlers
Info. Technology Engineering
P.O. Box 111
Tampa, FL 33601-0111

Justo E. Varela-Dieppa
1500 Franklin D. Roosevelt Avenue
Caparra, Puerto Rico 00936

Barry R. Rubens
Concord Telephone Company
68 Cabarrus Avenue, East
P.O. Box 227
Concord, North Carolina 28026

Robert L. Vasquez
Anchorage Telephone Utility
Legal Department
600 Telephone Avenue
Anchorage, Alaska 99503

J. S. Quarforth
Small Rural Virginia Telcos
401 Spring Ln., Suite 300
P.O. Box 1990
Waynesboro, VA 22980

Albert H. Frazier, Jr.
Celsat Inc.
879 W. 190th Street Suite 400
Gardena, CA 90248

Paul J. Sinderbrand
Keck, Mahin & Cate
Express Comm./ Wireless Cable
1201 New York Ave., N.W.
Penthouse
Washington, D.C. 20005-3919

John Q. Hearne, Chairman
Point Communications Company
100 Wilshire Blvd., Suite 1000
Santa Monica, CA 90401

Fletcher, Heald & Hildreth
Matsushita Comm. Indust.
Corp/America
1300 North 17th Street, 11th Floor
Roslyn, VA 22209

H. Mark Gibson
Comsearch
11720 Sunrise Valley Drive
Reston, VA 220911

Hill and O'Connor and Hannan
Florida Cellular RSA Limited Part.
1919 Pennsylvania Ave., N.W.,
Suite 800
Washington, D.C. 20006

Douglas G. Smith
Omnipoint Communications, Inc.
7150 Campus Dr., Suite 155
Colorado Springs, Colorado 80920

LCC Incorporate
John S. Fischer
2300 Clarendon Boulevard, Suite
800
Arlington, Virginia 22201

Richard G. Tomilinson
PCN Communications, Inc.
2906 Main St.
Glastonbury, CT 06033

Michael D. Basile, Atty
Dow, Lohnes & Albertson
Vanguard Cellular Systems, Inc.
1255 Twenty-Third Street
Washington, D.C. 20037

Donald C. Loughry
Chairman, IEEE 802
LAN Standards Committee
Hewlett-Packard Company
19420 Homestead Road, M/S 43UC
Cupertino, CA 95014

Peter A. Casciato, Atty
Cellular Services, Inc.
1500 Sansome Street, Suite 201
San Francisco, CA 94111

Kevin R. Compton
Kleiner Perkins Caufield & Byers
2750 Sand Hill Road
Menlo Park, CA 94025-7020

Shirley S. Fujimoto
Keller And Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001

InterDigital TeleCom Inc.
833 Northern Blvd, Suite 200
Great Neck, New York 11021-5308

S. M. Samuels
Swayzee Telephone Company
103 West Mark Street
Swayzee, Indiana 46986

Barker, Latham, Watkins, Atty.
Bell Atlantic Personal Comm., Inc.
1001 Pennsylvania, N.W., Suite 1300
Washington, D.C. 20004-2505

A. Thomas Carroccio, Atty
Pulson Communications Corp.
1155 Connecticut Ave. 9th Fl, N.W.
Washington, D.C. 20036

Alan R. Shark
American Mobile Telecom. Assoc.,
Inc.
1150 18th Street, NW, Suite 250
Washington, D.C. 20036

C. E. Baker
Arch Communications Group, Inc.
1800 West Park Drive, Suite 250
Westborough, MA 01581

Lon C. Levin
AMSC Subsidiary Corporation
10802 Park Ridge Blvd.
Reston, VA 22091

Lawrence J. Movshin, Esq.
The Small Business PCS Association
1735 New York Ave, NW, 600
Washington, DC 20006

Howard Oringer
Telesciences, Inc.
600 Montgomery Street
San Francisco, CA 94111

Fred I. Denny
Edison Electric Institute
701 Pennsylvania Ave., N.W.
Washington, D.C. 20004

Leonard Robert Raish
Fletcher, Heald & Hildreth
Pulse Engineering
1300 North 17th Street, 11th Floor
Roslyn, VA 22209

David A. Reams
Grand Broadcasting Corporation
P.O. Box 502
Perrysburg, Ohio 43552-0502

Stephen G. Kraskin
Rural Independent Coalition
2120 L Street, N.W., Suite 810
Washington, D.C. 20037

Robert A. Mazer
Nixon, Hargrave, Devans & Doyle
Lincoln Tele./Telegraph Corp.
One Thomas Circle, N.W. Suite 800
Washington, D.C. 20005

Robert M. Jackson, Atty.
Freeman Engineering
2120 L Street, NW
Suite 300
Washington, DC 20037

Deborah R. Broughton
Dow, Lohnes & Albertson
dbx Corporation
1255 23rd Street, N.W. Suite 500
Washington, D.C. 20037

Steven Stutman
Metriplex, Inc.
25 First Street
Cambridge, MA 02141

Gerald S. McGowan, Atty
Dial Page, Inc.
1819 H Street, N.W., St. 700
Washington, D.C. 20006

W. Randolph Young
1050 17th St., N.W. Suite 1200
City Utilities of Springfield, MS
Washington, D.C. 20036

Paul J. Feldman
Fletcher, Heald and Hildreth
Roseville Telephone Company
1300 North 17th Street, 11th Floor
Roslyn, VA 22209

Paul J. Feldman
Fletcher, Heald and Hildreth
Ohio Linx, Inc.
1300 North 17th Street, 11th Floor
Roslyn, VA 22209

David Lemon, P.E.
CNet, Inc.
4975 Preston Park Blvd., 8th Floor
Plano, TX 75093

Michael L. Glaser
Hopper & Kanouff, P.C.
Teleport Denver Ltd.
1610 Wynkoop, Suite 200
Denver, Colorado 80202-1196

John D. Lockton
Corporate Technology Partners
520 S. El Camino Real, Suite 715
San Mateo, CA 94402

James A. Kirkland
Mintz, Levin, Cohn,
Ferris, Glovsky & Popeo, P.C.
701 Pennsylvania, N.W., Suite 900
Washington, D.C. 20004

Thomas P. Kerester, Esq.
United States Small Business Admin.
409 3rd Street, S.W.
Washington, DC 20416

George Petrutsas
Fletcher, Heald & Hildreth
Harris Corp/Farinon Division
1300 North 17th Street, 11th Floor
Roslyn, VA 22209

Stuart F. Feldstein
Fleischman and Walsh
Adelphia and Newchannels
1400 Sixteenth Street, N.W.
Washington, D.C. 20036

William J. Gordon
In-Flight Phone Corp.
1146 19th St, N.W., Suite 200
Washington, D.C. 20036

Donald C. Loughry, Chr., IEEE 802
LAN-Standards Committee
Hewlett-Packard Company
19420 Homestead Road, M/S 43UC
Cupertino, CA 95014

Luin P. Fitch, Jr.
Comm/Finance Sect/Antitrust Div.
US Department of Justice, Rm 8104
Judiciary Center Building
555 Fourth Street, N.W.
Washington, D.C. 20001

Diane Smith
The Alltel Companies
1710 Rhode Island Ave. NW #1000
Washington, DC 20036

Michael Lubin
Pacific Communication Sciences,
Inc.
10075 Barnes Canyon Road
San Diego, CA 92121

Terrence P. McGarty
Telmarc Telecommunications Inc.
265 Franklin Street
Boston, MA 02110

Russell H. Fox
Gardner, Carton & Douglas
Power Spectrum, Inc.
1301 K St, N.W. Suite 900, E
Tower
Washington, D.C. 20006

Thomas Ohlsson, Mgr.
SpectraLink Corporation
1650 38th Street
Boulder, CO 80301

Robert J. Miller
Gardere & Wynne, L.L.P.
Alcatel Network Systems, Inc.
1601 Elm Street, Suite 3000
Dallas, TX 75201

Van Der Jagt
Knowledge Implement., Inc.
32 Conklin Road
Warwick, NY 10990

Marvin Hirschberg
Advanced Cordless Tech., Inc.
Building O
150 River Road
Montville, NJ 07045

Jeffrey Blumenfeld
Blumenfeld & Cohen
1615 M Street N.W. Suite 700
Washington, D.C. 20036

Robert B. Kelly, P.C.
Adv. Mobilecomm Technologies
Digital Spread Spectrum Tech., Inc.
1920 N Street, N.W., Suite 660
Washington, D.C. 20036

Andrew Balaschak
Rolm
4900 Old Ironsides Dr.
Santa Clara, CA 95054

Tel/Logic Inc.
51 Shore Drive
Plandome, NY 11030

TDS
Telephone & Data System
George Wheller, Koten, Nastlign
1150 Connecticut N.W. Suite 1000
Washington, D.C. 20036

Compaq
P.O. Box 692000
Houston, TX 77269-2000

Federal Comm. Bar Association
Allan Campbell
1150 Connecticut NW, Suite 1050
Washington, D.C. 20036

Margot Humphrey
Koten, Nastlign
National Rural Telecommunication
1150 Connecticut NW, Suite 1000
Washington, D.C. 20036

Assoc. of Public Safety
Communication Counsel for APCO
Wilkes, Artis & Hedrick & Lave
1667 K Street N.W.
Washington, D.C. 20006

William J. Franklin, Aide
1919 Pennsylvania, N.W., Suite 300
Washington, D.C. 20006-3404

AMSTV
Ronald Krotoozynski
Covington & Burling
1201 Pennsylvania Ave N.W.
Washington, D.C. 20044

National Communications System
701 S Court House Road
Arlington, VA 22204-2164

KSI
1420 16th St N.W.
Washington, D.C. 20036-2218

American Telephone & Telegraph
Berry, Davis, Atty
295 North Maple Ave, Rm 3244J1
Basking Ridge, N J 07920-1002

Frank M. Panek, Atty.
2000 West Ameritech Center, Rm
4H84
Hoffman Estates, IL 60196-1025

Apple Computer, Inc.
James F. Lovette
One Infinite Loop, MS: 301-4J
Cupertino, California 95014

Assoc. of Public-Safety
Comm. Officials-International. Inc.
Robert M. Gurs
WILKES, ARTIS, HEDRICK &
LANE,
1666 K Street, N.W.
Washington, D.C. 20006

Bell Atlantic
John M. Goodman, Atty
1710 H Street, N.W.
Washington, D.C. 20006

Bell Atlantic Personal Comm., Inc.
James H. Barker - LATHAM &
WATKINS
1001 Pennsylvania, NW, Suite 1300
Washington, D.C. 20004-2505

John F. Beasley
BellSouth Corporation
1155 Peachtree Street, N.E.
Suite 2003
Atlanta, Georgia 30309-3610

BellSouth Telecommunications, Inc.
BellSouth Cellular Corp.
Charles P. Featherstun
David Richards
1133 21st Street, N.W.
Washington, DC 20036

Bellsouth Corporation &
Bellsouth Telecomm., Inc.
Thompson T. Rawls II
4300 Southern Bell Center
675 West Peachtree St, N.E.
Atlanta, Georgia 30375

R. Philip Baker
Executive Vice President
Chickasaw Telephone Company
Box 460
Sulphur, OK 73086

J. Lyle Patrick, VP
Illinois Consolidated Telephone Co.
121 South 17th Street
Mattoon, IL 61938

W. S. Howard, Pres.
Millington Telephone Co.
4880 Navy Road
Millington, TN 38053

Robert L. Doyle, Pres.
Roseville Telephone Co.
P.O. Box 969
Roseville, CA 95678

Melissa Rogers, Atty
Dow, Lohnes & Albertson
Comcast PCS Communications, Inc.
1255 Twenty-Third Street
Washington, D.C. 20037

William D. Wallace
Crowell & Moring
Loral/Qualcomm Partnership, L.P.
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004-2595

John S. Logan
Dow, Lohnes & albertson
Cellular Information Systems, Inc.
1255 23rd St., NW, Suite 500
Washington, D.C 20037

Ellen S. Deutsch
Jacqueline R. Kinney
Citizens Utilities Company
P.O. Box 340
8920 Emerald Pk Dr, Suite C
Elk Grove, CA 95759-0340

Thomas Gutierrez, Atty
Columbia Cellular Corporation
1819 H Street, NW, 7th Fl.
Washington, D.C. 20006

John S. Hannon, Jr.
COMSAT Corp / COMSAT Mobil
Comm.
22300 COMSAT Drive
Clarksburg, MD 20871

Barry R. Rubens
The Concord Telephone Co.
68 Cabarrus Avenue, East
Post Office Box 227
Concord, N C 28026-0227

Harold K. McCombs, Jr.
Duncan, Weinberg, Miller &
Pembroke, P.C.
1615 M St., NW, Suite 800
Washington, D.C. 20036

Kathy L. Shobert, Dir.
Federal Regulatory Affairs
General Communication
Incorporated
888 16th St., NW, Suite 600
Washington, DC 20006

Laura Montgomery
Arter & Hadden
Iowa Network Services, Inc.
1801 K Street, N.W., Suite 400K
Washington, D.C. 20006

Chandos A. Rypinski
LACE, Inc.
655 Redwood Highway #340
Mill Valley, CA 94941

Marsha D. Olch
Director-External Affairs
McCaw Cellular Communications
5400 Carillon Point
Kirkland, Washington 98033

Larry S. Soloman, Atty
Metricom, Inc.
1250 Connecticut Avenue, NW
Washington, DC 20036

George E. Murray
Bryan Cave
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, Missouri 63102-2750

Robert S. Fastener, S.V. Pres.
Nextel Communications, Inc.
800 Connecticut Av. NW, 1001
Washington, DC 20006

James R. Hobson
Donelan, Cleary, Wood & Master
National Emergency Number
Association
1275 K Street N.W., Suite 850
Washington, D.C. 20005-4078

Raymond L. Strassburger, Dir.
Gov. Relations-Telecomm. Policy
Northern Telecom Inc.
801 Pennsylvania, NW, Suite 700
Washington, DC 20004

Mark J. Tauber
Omnipoint Communications, Inc.
Piper & Marbury
1200 19th St, NW, 7th Fl.
Washington, D.C. 20036

James P. Tuthill
Pacific Bell; Nevada Bell
140 New Montgomery St, Rm
1522A
San Francisco, California 94105

Nace, Lukas, Gist, Atty
Pacific Telecom Cellular, Inc.
1819 H Street, NW, 7th Fl
Washington, D.C. 20006

Bechtel & Cole, Chartered
Advanced Cordless Tech., Inc.
1901 L Street, N.W. - Suite 250
Washington, D.C. 20036

Nace, Greenstein, Gist
Alliance of Rural Area Telephone
and Cellular
1819 H Street, NW, 7th Fl.
Washington, D.C. 20006

Wayne V. Black, Atty
Keller and Heckman
American Petroleum Institute
1001 G Street, NW, Suite 500 W
Washington, D.C. 20001

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W., Suite 1200
Washington, D.C. 20036

Hill & Welch
1330 New Hampshire Ave, N W
Suite 113
Washington, D.C. 20036

Mark E. Crosby, Mgr.
Frederick J. Daly, Esq.
Industrial Telecomm. Assoc., Inc.
1110 N. Globe Road, Suite 500
Arlington, VA 22201-5720

TDS : Telephone & Data System
George Wheller
Koten, Nastlign, Atty
1150 Connecticut N.W. Suite 1000
Washington, DC 20036

Assoc. of Public Safety
Counsel for APCO
John Lane
1667 K Street NW
Washington, DC 20006

William J. Franklin, Aide
1919 Pennsylvania NW, Suite 300
Washington, DC 20006-3404

Killen & Associates
428 Fulton St.
Palo Alto, CA 94301

National Communications System
701 S Court House Road
Arlington, VA 22204-2164

Business Software Alliance
1201 Pennsylvania Avenue, NW
Washington, DC 20004-2401

Stroup, Golden
Telocator
Personal Commun. Industry Assoc.
1019 19th St., Suite 1100
Washington, D.C. 20036

Jay C. Keithley
Sprint Corporation
1850 M Street NW, Suite 1100
Washington, DC 20036

Eric Schimmel, VP
Telecommunications Industry
Association
2001 Pennsylvania, NW, Suite 800
Washington, DC 20006

McCullough, Assist. Atty. Gen.
Texas Advisory Comm / State
Emerg.
300 W. 15th St., 7th Fl
Austin, Texas 78711-2548

Norman P. Leventhal, Atty
TRW Inc.
2000 K Street, NW, Suite 600
Washington, D.C. 20006

Stuart F. Feldstein- Adelpia
/News.
Time Warner
Telecomm/Fleischman and Walsh
1400 Sixteenth St., NW, Suite 600
Washington, D.C. 20036

Stephen G. Kraskin
U.S. Intelco Networks, Inc.
2120 L Street, NW, Suite 810
Washington, D.C 20037

Jeffrey S. Bork
U S West, Inc.
1020 19th St, NW, Suite 700
Washington, D.C. 20036

R. Michael Senkowski
UTAM, Inc.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20036

Jeffrey L. Sheldon
Utilities Telecomm. Council
1140 Connecticut Av, NW
Washington, D.C. 20036

Meyers & Athari, Atty
Baraff, Koerner, Olender &
Hochberg, P.C.
Pegasus Communications, Inc.
5335 Wisconsin Ave. NW, Suite 300
Washington, D.C. 20015-2003

Ronald L. Plessner, Atty
PCS Action, Inc.
1200 19th Str, NW, 7th Floor
Washington, DC 20036

Mark J. Golden
Personal Comm. Industry
Association
1019 19th St. NW, Suite 1100
Washington, D.C. 20036

M. John Bowen, Jr.
PMN, Inc.
McNair & Sanford, P.A.
1155 Fifteenth Street, N.W.
Washington, D.C. 20005

John A. Prendergast, Atty
Radiofone, Inc.
Blooston, Mordkofsky, Jackson &
Dickens
2120 L Street, NW, Suite 300
Washington, DC 20037

Deborah Lipoff
Rand McNally & Company
8255 North Central Park
Skokie, Illinois 60076

Linda C. Sadler
Manager, Governmental Affairs
Rockwell International Corporation
1745 Jefferson Davis Highway
Arlington, VA 22202

Rural Cellular Association
Kraskin & Associates
2120 L St, NW, Suite 810
Washington, DC 20037

PacTel Corporation
2999 Oak Rd., MS 1050
Walnut Creek, CA 96596

John E. Ingle
James M. Carr
Federal Communications
Commission
1919 M Street, NW
Suite 602
Washington, DC 20554

Frank W. Krogh
MCI Telecommunications
Corporation
1801 Pennsylvania Ave., NW
Washington, DC 20006

Caressa D. Bennet
1831 Ontario Place, NW
Suite 200
Washington, DC 20009

Robert B. McKenna
1020 19th Street, NW
Suite 700
Washington, DC 20036

Joseph Di Bella
120 Bloomingdale Road
White Plains, NY 10605

Gary M. Epstein
Latham & Watkins
1001 Pennsylvania Avenue, NW
Suite 1300 North
Washington, DC 20004

Edward Raymond Wholl
2000 Corporate Drive
Orangeburg, NY 10962

Benjamin Herman Dickens, Jr.
Blooston, Mordkofsky, Jackson &
Dickens
2120 L Street, NW
Suite 300
Washington, DC 20037

David W. Carpenter
Sidley & Austin
One First National Plaza
Suite 4700
Chicago, IL 60603

James L. Wurtz
Pacific Bell and Nevada Bell
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Joe D. Edge
Sue W. Bladek
Drinker, Biddle & Reath
901 Fifteenth Street, NW
Suite 900
Washington, DC 20005

Cathleen A. Massey for
AT&T Wireless PCS, Inc.
1150 Connecticut Avenue, N.W.,
4th Floor
Washington, D. C. 20036

R. Michael Senkowski, Katherine
M. Holden, and Eric W. DeSilva,
Counsel for GTE Macro Commu-
nications Corporation
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D. C. 20006