

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION

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)

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

Cincinnati Bell Telephone Company ("CBT") petitioned the Commission to implement the mandate of Cincinnati Bell Telephone Co. v. FCC, Case No. 94-3701/4113 (6th Cir. Nov. 9, 1995). CBT requested 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. Several parties have filed oppositions to CBT's Petition.¹ As such objections share common themes, CBT submits this consolidated reply in support of its Petition.

¹CBT has already responded to the objections of GTE Mobilnet Incorporated which were served on CBT prior to the deadline for responses to CBT's Petition. Due to the intervening government shutdown, which caused the Commission's offices to be unexpectedly closed when oppositions would have come due, CBT filed its reply immediately upon reopening of the Commission's offices. Subsequently, CBT has received oppositions from Western PCS Corporation, Communications International Corporation, AT&T Wireless PCS Inc. and PCS Primeco, L.P. This reply is addressed jointly to such oppositions. With the exception of AT&T and GTE, whose Cincinnati MTA licenses are potentially affected by the relief sought by CBT, CBT doubts the other objectors have standing to object to this petition. None of the others have demonstrated that their PCS licenses are in areas where any party was adversely affected by the cellular attribution rule.

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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.² The Court remanded the proceeding to the Commission for further action consistent with its decision. In its Petition, CBT attempted to assist the Commission in endeavoring to carry out the mandate of the Court of Appeals. While there may be more than one way to implement the Court's decision, none of the objectors has put forward a constructive approach to how the defects in the eligibility rules should be repaired. CBT suggested that the best way for the Commission to correct the cellular attribution rule was to adopt the suggested 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. CBT's suggestion was that minority stock or limited partnership interests not be deemed attributable interests if a single unrelated party holds more than 50% of the outstanding stock or partnership equity or has voting control.³

The Court of Appeals urged the Commission to revisit the rules promptly after remand. CBT petitioned the Commission as soon as practicable after the release of the

² Cincinnati Bell Telephone Co. v. FCC, Case No. 94-3701/4113 (6th Cir. Nov. 9, 1995).

³AT&T has dubbed this the "single majority shareholder" standard. While AT&T proclaims that this standard would open up numerous licenses, including areas where AT&T itself is a minority owner in a single majority shareholder situation, it provides no evidence to that effect. CBT presented documentation during the Commission's rulemaking proceeding to the effect that only a handful of entities, mostly small telephone companies, were rendered ineligible by the attribution standard CBT sought to have removed. See Appendices to Petition for Reconsideration of Chickasaw Telephone Company, Cincinnati Bell Telephone Company, Illinois Consolidated Telephone Company, Millington Telephone Company and Roseville Telephone Company, filed December 8, 1993, GEN Docket No. 90-3114, RM-7140, RM-7175, RM-7618.

Court's mandate. A primary motivation for CBT petitioning the Commission as it did was to get the remand process moving so that a solution could be reached as soon as possible.

CBT's proposal is fully consistent with the Court's decision. No one else has put forth any viable suggestions. The only other proposal has been to reissue the old rule with new reasons, however, the supporters of that outcome have not supplied any new, viable grounds to justify the old rule that were not already rejected by the Court as inadequate. The solution proposed by CBT is, therefore, the only viable one before the Commission at this time.

For any changes to the rules that render CBT eligible for a PCS license in the Cincinnati MTA to be meaningful, the Commission must also offer CBT a remedy for being arbitrarily excluded from the auction in the first place. CBT was not allowed to participate in the auction as it could have done had the Commission either 1) adopted the rule originally proposed by CBT, 2) granted CBT's request for a waiver of the cellular attribution rules, or 3) stayed the auction pending the decision of the Court of Appeals. AT&T implies that through its silence on remedies, the Sixth Circuit did not intend for CBT to obtain any relief other than a rejustification of the arbitrary rules. AT&T's argument is not based on any actual ruling by the Court of Appeals and ignores the procedural history of this case.

After the oral argument before the Court of Appeals, but before the release of its decision, the Court stayed the C Block auction. Radiofone had argued that if the auction were permitted to go forward, that its opportunity to participate in PCS would be lost. The Commission filed an emergency application to vacate the stay with the United States Supreme Court. Justice Stevens vacated the stay in a Memorandum released October 25, 1995, wherein he stated:

I am persuaded, however, that allowing the national auction to go forward will not defeat the power of the Court of Appeals to grant appropriate relief in the event that the respondent overcomes the presumption of validity that supports the FCC regulations and prevails on the merits.

The stay was lifted, the auction went forward, and Radiofone, like CBT, was successful on the merits of its appeal. Justice Stevens clearly stated that successful petitioners would have a remedy, despite the fact the auction could go forward. He would not have lifted the stay otherwise. CBT must be afforded an adequate remedy that restores it to the position it would have had if the Commission had not enacted the arbitrary attribution rule. CBT has posited a revisitation of the licenses in the Cincinnati MTA as the only logical remedy available. Neither AT&T, nor any other objector, has suggested an alternative remedy that could fully restore CBT's rights.

The objectors contend that CBT should have filed oppositions to the grant of licenses to the successful high bidders in the auction. As CBT has already pointed out, such a suggestion exalts form over substance and any such filing would have been futile. First, the license approval proceedings were conducted only to confirm the fitness of the auction winners to hold PCS licenses. CBT's challenge does not go to the fitness of other potential licensees. CBT's challenge was to the rules that narrowed the field of candidates and prevented it from being a licensee. CBT has successfully established that the rules were flawed, so it follows that the licensing proceedings which ratified the auction results were themselves automatically flawed, irrespective of who the ultimate licensees were. Even had CBT objected to the issuance of any particular license, it is a certainty that the Commission would have overruled such objections, because, at the time, the Commission was strenuously advocating that its rules were proper and had rejected every challenge to the rules

theretofore. There is absolutely no basis to expect that any license would have been denied on this basis.⁴

Several objectors also attempt to argue that CBT cannot object to the auction results because it did not participate in the auction itself or because it did not take advantage of the limited waiver granted by the Commission.⁵ These objectors fail to acknowledge the import of their argument. CBT has contended that its affiliate is entitled to maintain its present interest in a cellular partnership and participate in PCS itself. Under either the Commission's general eligibility rules or the limited waiver, CBT, by registering for the auction itself, would have had to make a commitment to divest itself of the attributable cellular interest. CBT could not be forced to make that commitment simply in order to participate, as the Court of Appeals has confirmed in its decision. The Commission had no reasonable justification for requiring such divestiture and CBT cannot now be punished and left without a remedy because it chose not to succumb to arbitrary and capricious requirements.

⁴Several parties did challenge the issuance of certain licenses on other grounds. The Commission rejected such challenges and granted licenses to the successful bidders. There is no reason to believe a challenge by CBT, based upon the procedures followed as opposed to the qualifications of the licensees, would have been treated any differently.

⁵CBT has emphasized before that the limited waiver was not granted until after registration for the auction had closed. Therefore, even if CBT had been inclined to participate in the auction under the then-applicable rules, it would have had to decide to do so before enjoying whatever limited relief was afforded by the waiver or even knowing that it would receive any form of waiver. The applications of others who attempted to register for the auction after the deadline were rejected by the Commission. Had CBT attempted to take advantage of the limited waiver after the auction deadline, it would have been unable to do so.

Some objectors also suggest that the 45 MHz spectrum cap contained in 47 C.F.R. § 20.6 would prohibit CBT from participating in PCS even if the cellular attribution rule is changed. This argument apparently assumes that the identical attribution rule in the 45 MHz spectrum cap could be applied for purposes of the 45 MHz limit even though it could not be applied for purposes of determining cellular cross-ownership.⁶ This argument overlooks two points: part of the relief requested by CBT was to make "any other parallel changes to Commission rules⁷ necessary to render the rules consistent with the Sixth Circuit's opinion"; and, since the generic attribution rule in the 45 MHz cap is identical to the cellular attribution standard, was directly based upon the cellular attribution standard, and the rulemaking proceeding had no additional record support, the generic attribution rule is also necessarily arbitrary and capricious. Failure of the Commission to vacate or amend the attribution rule under the 45 MHz cap, or at least waive its application to CBT, would itself be an arbitrary action that could not be used to prohibit CBT from holding a PCS license.

Contrary to the arguments of objectors, CBT does have standing to seek reopening of the A and B Block license grants. CBT has suffered an actual injury (being declared ineligible) that is directly traceable to the contested action (arbitrary rulemaking). The injury

⁶So long as CBT's affiliate's cellular interest is not attributed to CBT, it makes no difference whether the 45 MHz spectrum cap remains in existence or not. CBT would not run afoul of the cap without an attributable interest.

⁷The Commission has historically made parallel changes to the cellular cross-ownership rules and the spectrum cap rules. See, e.g., In the Matter of Implementation of Section 309(j) of the Communications Act - Competitive Bidding Amendment of the Commission's Cellular PCS Cross-Ownership Rule Implementation of Sections 3(n) and 332 of the Communications Act Regulatory Treatment of Mobile Services, 78 Rad. Reg. 2d (P&F) 934, FCC 95-301 (released July 18, 1995), at paras. 49-52. There would be no justification not to make parallel changes to these rules in this instance.

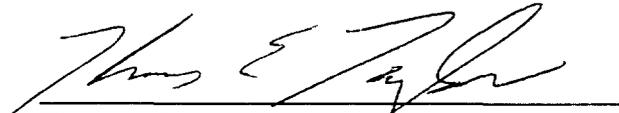
to CBT was its ineligibility to participate in PCS without divesting its cellular interest. The Court of Appeals has now confirmed that the Commission did not have adequate reasons to exclude CBT. This injury is directly attributable to the eligibility rules. AT&T's argument that CBT would have to show it would be the winner in the auction to show an injury is absurd. The very fact that CBT was denied the opportunity to participate is injury enough. CBT made every reasonable effort to avoid the consequences of the rule: CBT participated in the rulemaking proceeding and urged the Commission to adopt a rule that would not exclude it; CBT requested a waiver of the divestiture rule for its particular situation, which waiver was denied in pertinent part; CBT requested a stay of the auction, which was never even acted upon by the Commission; and, finally, CBT took its case to the Court of Appeals, which agreed that the Commission had acted arbitrarily. There was no requirement that CBT do anything further to protect its position. CBT could not be forced into choosing between entering the PCS business or retaining its cellular interests. That was the whole point of the appellate proceeding, to have it declared that entities in CBT's situation should not be forced to make that choice. Western argues absurdly that CBT forfeited its rights to participate at all by not succumbing to the arbitrary choice with which it was faced. If the "bid but divest" procedure was reasonable, the Court of Appeals would have had no reason to throw out the attribution rule.

The argument that CBT had to register for the auction to preserve its rights is untenable. The cases cited by Western did not involve situations where the eligibility rules were under challenge and found to be arbitrary. Since CBT was not eligible for a license under the rules as they existed on the application deadline, Western is essentially advocating

a strategy similar to "civil disobedience," whereby ineligible parties would have to apply, knowing they were ineligible, as a "protest" to preserve their rights. Such an approach makes no sense legally or administratively. Had CBT applied for a license, the Commission would have denied its application. This would not have advanced CBT's case to any degree, would not have stopped the auction and licensing process and would not have stopped those who received licenses from beginning construction.

CBT does not doubt that successful bidders who have received licenses have invested large sums of money and are not happy that their licenses may be in jeopardy. However, nothing CBT did or could have done would have changed that fact. CBT only seeks to receive that to which it is entitled. Therefore, CBT requests that the Commission implement the rule suggested by CBT and do what is necessary to afford CBT a fair opportunity to participate in PCS.

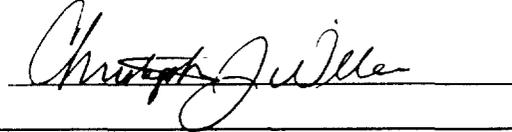
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The undersigned hereby certifies that a copy of the foregoing Response was served by first class mail, postage prepaid, upon the parties listed below this 26th day of January, 1996.



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