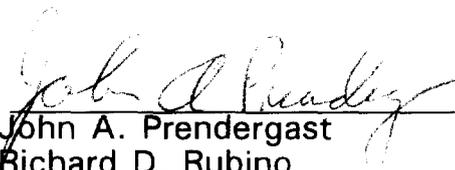


CONCLUSION

The Commission properly recognizes the need to protect the rights of incumbent licensees, to ensure that they can continue to provide vital services to the public. As discussed above, significant modifications to the proposed market area licensing rules are needed to ensure that these services are not jeopardized. Accordingly, the Commission should revise its proposed licensing scheme in the manner detailed above.

Respectfully submitted,

By: 
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Filed: March 18, 1996

ATTACHMENT A

Ameritel Paging, Inc.

Anserphone of Natchez, Inc.

CommNet Paging Inc.

Metro/Delta, Inc.

Oregon Telephone Corporation

Paging Systems Management, Inc.

Professional Answering Service, Inc.

Radio Paging Service

Radiofone, Inc.

RCC Paging, Inc.

Sema-Phoon, Inc.

Teletouch Communications, Inc.

Ventures in Paging L.C.

Clifford D. and Barbara J. Moeller d/b/a Valley Answering Service

AFFIDAVIT OF SEAN A. AUSTIN

Washington, DC

I, Sean A. Austin, hereby declare, under penalty of perjury under the laws of the United States, the following:

1. I am employed as Director of Engineering, Commercial Radio, for the law firm of Blooston, Mordkofsky, Jackson & Dickens in Washington, D.C. I have over 14 years of experience in telecommunications, radio frequency propagation, and acoustic engineering.
2. I hold the degree of Bachelor of Engineering in Electrical Engineering from The City College School of Engineering, of the City University of New York. I have also taken graduate level and professional advancement courses in telecommunications, and have been employed as an engineering consultant on numerous occasions.
3. I am familiar with Part 22 of the Federal Communications Commission's ("FCC's") Rules, and have prepared or supervised the preparation of the technical portions of numerous applications filed with the FCC.
4. On behalf of our common carrier and exclusive private carrier paging clients, I have reviewed and have performed a preliminary study of the Commission's February 9, 1996 Notice of Proposed Rulemaking (NPRM) in WT Docket No. 96-18 and PP Docket 93-253.
5. This declaration has been prepared to support opposition to the Commission's proposal to reduce the existing protected service and interference contours for 900 MHz stations. As demonstrated herein, preliminary studies indicate that the formulae proposed in the NPRM are extremely restrictive for 900 MHz one-way paging protected area concerns, and that additional time be allotted to perform further evaluations and field research to validate the reliability of the proposed mathematical model.
6. Currently Rule Section 47 C.F.R. 22.537(e) & (f) the Commission provides a tabulated stepwise 931 MHz service and interfering radii which were based on Okumura's 900 MHz curves. This method allowed for a minimum protected service area of 20 miles, and a minimum interfering radius of 50 miles (for a minimum mileage separation of 70 miles).
7. The proposed new formulae produce substantially less service and interference radii which in turn results in co-channel licensees being able to establish facilities much closer to incumbent's stations than previously allowed. In this regard, preliminary studies indicated that the reduction of protected separation distance may result in potentially harmful co-channel interference scenarios between incumbent stations and the auction winner's co-channel facilities for numerous situations evaluated.

8. Preliminary determinations indicate that the proposed service and interference contour formulae underestimate the actual coverage provided by 900 MHz one-way paging stations. I suggest that additional time be allotted to further evaluate the mathematical formulae, and to conduct field research to validate the reliability of the proposed mathematical model.

9. The proposed formulae may also result in gaps being created in a system which previously had continuous coverage among its sites. These gaps may be large enough to allow the market area licensee to be able to install co-channel transmitters between incumbent's previously protected areas. In my opinion, this situation can dramatically increase the potential for harmful co-channel interference to an existing system, as well as cause substantial degradation of service to the public since new transmitter(s) may be lodged between currently covered population areas, that experience acceptable coverage. In addition, the introduction of a hostile transmitter could effect several existing stations arranged in a multi-transmitter simulcast system having adverse effects on all. For this reason I oppose the acceptance of the proposed mathematical formulae for calculation of 900 MHz one-way paging service and interference radii

Dated this 18th day of March, 1996

A handwritten signature in cursive script, appearing to read "Sean A. Austin", written over a horizontal line.

Sean A. Austin

CERTIFICATE OF SERVICE

I, Elizabeth A. Ebere, hereby certify that I am an employee of Blooston, Mordkofsky, Jackson & Dickens, and that on this 18th day of March, 1996, I caused to be delivered by first-class U.S. mail, postage prepaid, a copy of the foregoing **Comments of the Paging Coalition on Market Area Auction Proposal** to the following:

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Commissioner James Quello*
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Commissioner Andrew Barrett*
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