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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

By Hand Delivery

Suzanne Toller, Esquire
Legal Advisor
Office of Commissioner Rachelle Chong
Federal Communications Commission
1919 M Street, N.W.
Room 844
Washington, D.C. 20554

Re: WT Docket No. 96-18
Geographic Licensing for Paging Systems

Dear Ms. Toller:

In our meeting on April 2, 1996, you expressed some concern regarding the legal implications of relaxing the paging freeze for the benefit of incumbent system operators without according equivalent relief to new entrants. In reflecting on this discussion, it occurred to me that the Commission recently addressed a similar situation in the 220-222 MHz band proceeding. In the Second Report and Order (PR Docket No. 89-552) released January 26, 1996, FCC 96-27, the Commission adopted a procedure that enabled 220 MHz licensees to modify their licenses to relocate authorized base stations. In doing so, the Commission held

While we are ordinarily reluctant to open a "license modification only" filing window, where the applications

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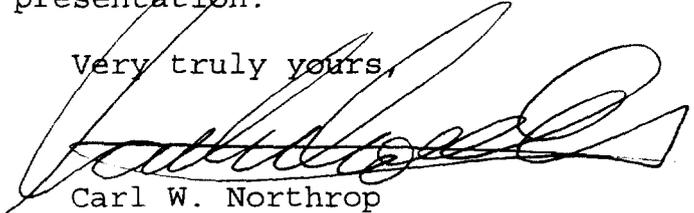
of initial applicants would not be accepted, we recognize that the 220 MHz service is unique.

Id. at ¶4.

As indicated in the handout AirTouch Paging distributed at our meeting on Tuesday, the paging industry presents other unique attributes with reference to freeze issues. Therefore, the recent 220 MHz action is on point, and provides recent precedent in support of allowing a narrow exception to the freeze to permit license modifications only.

If AirTouch Paging can be of further assistance to you in connection with this matter, please do not hesitate to call. In the meantime, I am forwarding a copy of this letter to the Acting Secretary for association with the public file as an ex parte presentation.

Very truly yours,



Carl W. Northrop

CWN:yo

cc: William F. Caton, Acting Secretary