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July 1, 1996

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
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JUL 1 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: 220-222 MHz SMR Phase II Licensing
PR Docket No. 89-552
GN Docket No. 93-252
PP Docket No. 93-253 ✓
Ex Parte Comments of Roamer One, Inc.

Dear Mr. Caton:

Attached hereto are an original and two (2) copies of the Ex Parte comments of Roamer One, Inc. as submitted today in the above-captioned, non-restricted rulemaking.

Please contact this law firm if you have any questions with respect to this matter.

Respectfully submitted,



William J. Franklin
Attorney for Roamer One, Inc.

Encls.
WJF/mtf
cc: Roamer One, Inc.

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Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C. 20054

Via Messenger
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: 220-222 MHz SMR Phase II Licensing
PR Docket No. 89-552
GN Docket No. 93-252
PP Docket No. 93-253

Dear Chairman Hundt:

This letter is being written on behalf of Roamer One, Inc. ("Roamer") with respect to the Commission's proposal to rechannelize the 220-222 MHz band. See generally 220-222 MHz Phase II Licensing, 11 FCC Rcd 188 (1996) (PR Dkt. No. 89-522) (Second Memorandum Opinion and Order and Third Notice of Proposed Rulemaking) ("Third NPRM"). As Roamer describes, the public interest will be served if the Commission were to adopt a channelization plan fully compatible with existing (Phase I) 220 MHz licenses and systems

Description of Roamer. Roamer (formerly known as Simrom, Inc.) is a wholly owned subsidiary of Intek Diversified Corporation ("Intek"), a publicly traded Delaware corporation listed on NASDAQ. Founded and staffed by experienced communications personnel, Roamer's sole business function is to construct and manage 220 MHz SMR systems across the country. Roamer has participated actively in the Commission's CMRS, Competitive Bidding, and 220-222 MHz rulemakings.

Roamer's current business operations serve the public interest by actively developing the 220 MHz spectrum. Roamer placed its first 220 MHz SMR system in operation during February 1994, more than two years ago. At present, Roamer is now operating approximately one-hundred-seventy (170) 220 MHz SMR systems for those licensees, and has acquired RF equipment or begun installation for approximately fifty (50) more systems. Also, Roamer has RF equipment on order for another fifty (50) systems. Thus, Roamer and its managed licensees have made substantial investments based upon the existing 220 MHz authorizations.

Description of the Issue. As an overview, Sections 90.717-90.723 of the Commission's Rules currently breaks the 220-222 MHz band into two hundred (200) 5 KHz channels. Those channels are then allocated to specific uses as follows:

Channels	Current Usage (per Sections 90.717-90.723)
1-20	Local SMR (20 systems), channel 1 of 5
21-30	Nationwide SMR (2 systems, 5 channels each)
31-50	Local SMR (20 systems), channel 2 of 5
51-60	Nationwide non-commercial (1 system, 10 channels)
61-80	Local SMR (20 systems), channel 3 of 5
81-90	Nationwide non-commercial (2 systems, 5 channels each)
91-110	Local SMR (20 systems), channel 4 of 5
111-120	Nationwide governmental (2 systems, 5 channels each)
121-140	Local SMR (20 systems), channel 5 of 5
141-150	Nationwide non-commercial (1 system, 10 channels)
151-160	Nationwide SMR (2 systems, 5 channels each)
161-200	(Various single-channel uses)

Roamer's concern is limited to the Commission's proposal for the non-contiguous channels (1-20, 31-50, 61-80, 91-110, and 121-140, shaded in the table, above). For Phase I licensing, these channels are allocated to twenty (20) 5-channel local SMR systems on a non-contiguous basis, i.e., channel group no. 1 (for one set of licenses) consists of channels 1-31-61-91-121.^{1/}

^{1/} Attachment A hereto is a tabulation (on a channel-by-channel basis) for the existing allocation of these channels, the Commission's proposal from the Third NPRM, and a composite example of another allocation developed by Roamer (discussed infra) which will better serve the public interest while also satisfying the Commission's stated regulatory goals for this rulemaking.

The Commission's Third NPRM (11 FCC Rcd at 198-99, 218-224) proposes to reallocate Phase I's non-nationwide SMR channels from local (site-based) licensing to geographic licensing, some for Economic Areas ("EAs") and some for larger geographic regions. This proposal appears sound. However, the Commission is proposing to issue the new EA or regional licenses for contiguous channel blocks, and not retain the non-contiguous channelization used by Phase I licensing. Specifically, with respect to the local SMR channels, the Commission has proposed the following:

Channels	Proposed Usage (<u>Third NPRM</u>)
1-10	Regional License (10 channels)
11-20	Regional License (10 channels)
31-50	Regional License (20 channels)
61-70	EA License (10 channels)
71-80	EA License (10 channels)
91-100	EA License (10 channels)
101-110	EA License (10 channels)
121-125	EA License (5 channels)
126-130	EA License (5 channels)
131-135	EA License (5 channels)
136-140	EA License (5 channels)

In this table, the interior double lines divide the proposed allocation to correspond to the existing non-contiguous channels blocks licensed to local 220 MHz SMR systems. See Attachment A hereto for further information.

Under the proposal of the Third NPRM, the channels assigned to each existing local SMR licensee will be reassigned to five (5) different regional or EA licenses. For example, a SMR licensee for channel group 1 will find its five licensed channels reassigned to the first 10-channel regional license (channel 1), the 20-channel regional license (channel 31), the first 10-channel EA license (channel 61), the third 10-channel EA license (channel 91), and the first 5-channel EA license (channel 121).

Conversely, each EA or regional licensee will find that its licensed channels are operating on a co-channel basis to systems licensed to either 5, 10, or 20 local SMR systems, depending on the Phase II system size. The pairing of channels between Phase I and proposed Phase II systems is depicted in Attachment A.

The Commission's Proposal Is Unworkable. The Commission therefore, has proposed to overlay eleven (11) EA or regional systems using contiguous channel allocations in the 100 channels now licensed to twenty (20) local SMR systems for groups of non-contiguous channels.^{2/} Based on its extensive experience as an operator and manager of 220 MHz systems, Roamer has concluded that the Commission's proposal is unworkable, and therefore would not serve the public interest.

Roamer bases its conclusion on the following factors:

1. Because of the mismatch in channel assignments between Phase I and proposed Phase II licenses, no existing 220 MHz licensee likely will be able to expand its system by winning Phase II licenses. For example, a SMR licensee for channel group 1 would be required to be the high bidder on a specific 10-channel regional license, the corresponding 20-channel regional license, two (2) 10-channel EA licenses, and a specific 5-channel EA license -- all for the same geographic area -- in order to have expansion rights for its existing 5-channel SMR system. The Phase II auction cannot be a success if it systematically excludes virtually all of the existing 220 MHz industry.
2. Also because of the mismatch in channel assignments, a winner of a Phase II license (depending on the size of its license) would be required to perform inter-system coordination with either 5, 10, or 20 different local SMR licensees in each market in its EA or region. It is likely that the various local SMR licensees would not have used the same transmitter sites for their various systems. Because of the possibility for co-channel or adjacent-channel interference from these different systems, the Phase II licensee could

^{2/} Roamer understands that the Wireless Telecommunications Bureau has recommended a hybrid plan to the Commission, in which some of the local 220 MHz SMR channels are rechannelized, and others are not. For the reasons set forth herein, Roamer opposes any plan which inconsistently reallocates existing local SMR channels. As we demonstrate later, the Commission's goals can be fully satisfied with a consistent reallocation.

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find its impossible to locate all of its channels at any single transmitter site within large portions of its EA or region.

3. As a further result of the mismatch in channel assignments, 220 MHz SMR subscriber equipment would need to be channelized for either Phase I systems (non-contiguous channels) or for Phase II systems (adjacent channels). Even without regard to channel aggregation, this could well prevent equipment manufacturers from reaching economies of scale in producing 220 MHz subscriber equipment. Further, it would inhibit spectrum efficiency, as subscribers could not be shared between trunked Phase I and Phase II systems.
4. Adopting a mismatched channel assignments between Phase I and Phase II systems likely would discourage new entrants into the 220 MHz auction. The financial attractiveness of a frequency band with inconsistent technical standards, difficult operational problems (as discussed above), a potentially fragmented subscriber base, and limited-production, uncompetitively-priced equipment could well discourage participation and/or bidding in a 220 MHz auction.
5. The Commission originally adopted the 5 KHz channelization for the 220-222 MHz band to encourage the development of commercially viable narrowband technology. Securicor, SEA, and other manufacturers have expended millions of dollars in successfully meeting the Commission's challenge. If the Commission's Phase II rules eliminate the regulatory basis for this research and development, the Commission will lose the credibility to encourage future development of advanced communications technology when it adopts new, stringent regulatory requirements for any radio service.

For these reasons, the Commission should not rechannelize the local 220 MHz SMR channels as proposed in the Third NPRM, or adopt any other the channelization plan which does not track the non-contiguous channel assignments of the Phase I local SMR channels.

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Other Channelization Plans Will Satisfy the Commission's Goals.

Roamer understands that the Commission has identified several goals to be achieved in reallocating the local 220 MHz channels. First, obviously, it seeks to shift from site-specific licensing to geographic licensing.^{3/} Second, it seeks to shift from non-contiguous to contiguous channels.^{4/} Third, it seeks to maximize the use of regional channels in the lower and upper frequency blocks of the 220 MHz band, i.e., blocks 1-40 and 161-200.^{5/} Additionally, although not explicit in the Third NPRM, the Commission seeks to encourage new entrants into the 220 MHz auction.

Attachment A hereto includes a "Composite Example" channelization proposal for the existing non-contiguous channels which (a) satisfies the Commission's rulemaking goals, (b) eliminates Roamer's objections to the proposed channelization, and therefore (c) better serves the public interest.^{6/} This channelization proposal has the following desirable characteristics:

- It retains the same number and size of EA and regional licenses as the Commission proposed for the existing local 220 MHz SMR channels.
- It retains full contiguous channelization for one 10-channel regional block (channels 171-180) and for the 15-channel

^{3/} Third NPRM at 219-20.

^{4/} Id. at 221-22.

^{5/} Id. at 223-24.

^{6/} Although Roamer considers its plan to be suitable, Roamer is not advocating this plan to the exclusion of any other also consistent with the existing Phase I, non-continuous channelization. Roamer's plan is a feasible example of Phase II channelization, not a definitive proposal.

This plan only specifies a new channelization for the existing 220 MHz channels which are licensed on a non-contiguous basis. Roamer assumes for the purpose of this letter that the Commission would adopt its existing proposal for the currently contiguous channels. Roamer further assumes that the Commission would adopt its proposal to "maintain a spectral efficiency at least equivalent to that obtained through 5 kHz channelization." See Third NPRM, supra, 11 FCC Rcd at 230 & n.129 (footnote omitted).

regional block (channels 186-200), and partial contiguous channelization for the remaining regional blocks (2 10-channel; 1 20-channel) and for all four 10-channel EA blocks. Additional contiguous channelization could be obtained by the combination of adjacent 10- or 20-channel blocks, much like the 10 MHz broadband PCS blocks may be added to the 30 MHz PCS blocks. Regional licenses remain concentrated in the lower and upper 220 Mhz channels, albeit at a lower level in the lower block.

- Within these constraints, it has a one-to-one match-up between existing local SMR channels and new EA or regional licenses. An existing local SMR could purchase expansion rights for its channel by acquiring only one EA or regional license. Conversely, a Phase II licensee for the local SMR channels would have to coordinate with only one (1) SMR channel group for every 5 KHz of acquired spectrum.
- It assures full compatibility of subscriber and base-station equipment between Phase I and Phase II systems for maximum system interoperability, full roaming potential, and enhanced economies of scale in manufacture and distribution.
- It encourages existing Phase I licenses and managers to participate in the Phase II auction by preserving the regulatory structure underpinning their substantial investments in equipment, marketing, and subscribers.
- It encourages new entrants into the Phase II auction by permitting them to build upon the existing Phase I systems and subscriber base, if they so choose, or to propose new digital communications systems.
- It is technology-neutral, in that it neither penalizes existing technology or discourages new technology. Both are encouraged to flourish under Phase II licensing.

Given the availability of an improved proposal, Roamer respectfully suggests that the adoption of the Commission's proposal from the Third NPRM (or any variant thereof) for mismatched, contiguous channelization simply would not serve the public interest.

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As did the overwhelming weight of comments in this proceeding, Roamer therefore urges the Commission to adopt a Phase II channel plan consistent with Phase I licensing.

Respectfully submitted,



William J. Franklin
Attorney for Roamer One, Inc.

Encl.

WJF/mtf

cc: Commissioner James H. Quello
Commissioner Rachelle B. Chong
Commissioner Susan Ness
Michelle Farquhar
Chief, Wireless Telecommunications Bureau
Rosalind Allen
Deputy Chief, Wireless Telecommunications Bureau
John Cimko,
Chief, Policy Division,
Wireless Telecommunications Bureau
David Furth,
Chief, Commercial Wireless Division,
Wireless Telecommunications Bureau
William F. Caton,
Acting Secretary, Federal Communications Commission
(original and two copies per Section 1.1206(a)(2))
Roamer One, Inc.

**Comparison of 220 MHz Channel Allocation Plans
(Existing Non-Contiguous Channels Only)**

Chan No	Current Allocation	Proposed (3d NPRM)	Composite Example
1	Local SMR #01 (QT)	Regional Block V* (10 ch)	Regional Block V* (10 ch)
2	Local SMR #02 (QT)	Regional Block V* (10 ch)	Regional Block V* (10 ch)
3	Local SMR #03 (QT)	Regional Block V* (10 ch)	Regional Block W* (10 ch)
4	Local SMR #04 (QT)	Regional Block V* (10 ch)	Regional Block W* (10 ch)
5	Local SMR #05 (QT)	Regional Block V* (10 ch)	Regional Block X* (20 ch)
6	Local SMR #06 (QT)	Regional Block V* (10 ch)	Regional Block X* (20 ch)
7	Local SMR #07 (QT)	Regional Block V* (10 ch)	Regional Block X* (20 ch)
8	Local SMR #08 (QT)	Regional Block V* (10 ch)	Regional Block X* (20 ch)
9	Local SMR #09 (QT)	Regional Block V* (10 ch)	EA Block A* (10 ch)
10	Local SMR #10 (QT)	Regional Block V* (10 ch)	EA Block A* (10 ch)
11	Local SMR #11 (QT)	Regional Block W* (10 ch)	EA Block B* (10 ch)
12	Local SMR #12 (QT)	Regional Block W* (10 ch)	EA Block B* (10 ch)
13	Local SMR #13 (QT)	Regional Block W* (10 ch)	EA Block C* (10 ch)
14	Local SMR #14 (QT)	Regional Block W* (10 ch)	EA Block C* (10 ch)
15	Local SMR #15 (QT)	Regional Block W* (10 ch)	EA Block D* (10 ch)
16	Local SMR #16 (QT)	Regional Block W* (10 ch)	EA Block D* (10 ch)
17	Local SMR #17 (QT)	Regional Block W* (10 ch)	EA Block E* (5 ch)
18	Local SMR #18 (QT)	Regional Block W* (10 ch)	EA Block F* (5 ch)
19	Local SMR #19 (QT)	Regional Block W* (10 ch)	EA Block G* (5 ch)
20	Local SMR #20 (QT)	Regional Block W* (10 ch)	EA Block H* (5 ch)
21-30		(Contiguous Allocation Omitted)	
31	Local SMR #01 (QT)	Regional Block X* (20 ch)	Regional Block V* (10 ch)
32	Local SMR #02 (QT)	Regional Block X* (20 ch)	Regional Block V* (10 ch)
33	Local SMR #03 (QT)	Regional Block X* (20 ch)	Regional Block W* (10 ch)
34	Local SMR #04 (QT)	Regional Block X* (20 ch)	Regional Block W* (10 ch)
35	Local SMR #05 (QT)	Regional Block X* (20 ch)	Regional Block X* (20 ch)
36	Local SMR #06 (QT)	Regional Block X* (20 ch)	Regional Block X* (20 ch)
37	Local SMR #07 (QT)	Regional Block X* (20 ch)	Regional Block X* (20 ch)
38	Local SMR #08 (QT)	Regional Block X* (20 ch)	Regional Block X* (20 ch)
39	Local SMR #09 (QT)	Regional Block X* (20 ch)	EA Block A* (10 ch)
40	Local SMR #10 (QT)	Regional Block X* (20 ch)	EA Block A* (10 ch)
41	Local SMR #11 (QT)	Regional Block X* (20 ch)	EA Block B* (10 ch)
42	Local SMR #12 (QT)	Regional Block X* (20 ch)	EA Block B* (10 ch)
43	Local SMR #13 (QT)	Regional Block X* (20 ch)	EA Block C* (10 ch)
44	Local SMR #14 (QT)	Regional Block X* (20 ch)	EA Block C* (10 ch)
45	Local SMR #15 (QT)	Regional Block X* (20 ch)	EA Block D* (10 ch)
46	Local SMR #16 (QT)	Regional Block X* (20 ch)	EA Block D* (10 ch)
47	Local SMR #17 (QT)	Regional Block X* (20 ch)	EA Block E* (5 ch)
48	Local SMR #18 (QT)	Regional Block X* (20 ch)	EA Block F* (5 ch)
49	Local SMR #19 (QT)	Regional Block X* (20 ch)	EA Block G* (5 ch)

**Comparison of 220 MHz Channel Allocation Plans
(Existing Non-Contiguous Channels Only)**

Chan No	Current Allocation	Proposed (3d NPRM)	Composite Example
50	Local SMR #20 (QT)	Regional Block X* (20 ch)	EA Block H* (5 ch)
51-60		(Contiguous Allocation Omitted)	
61	Local SMR #01 (QT)	EA Block A* (10 ch)	Regional Block V* (10 ch)
62	Local SMR #02 (QT)	EA Block A* (10 ch)	Regional Block V* (10 ch)
63	Local SMR #03 (QT)	EA Block A* (10 ch)	Regional Block W* (10 ch)
64	Local SMR #04 (QT)	EA Block A* (10 ch)	Regional Block W* (10 ch)
65	Local SMR #05 (QT)	EA Block A* (10 ch)	Regional Block X* (20 ch)
66	Local SMR #06 (QT)	EA Block A* (10 ch)	Regional Block X* (20 ch)
67	Local SMR #07 (QT)	EA Block A* (10 ch)	Regional Block X* (20 ch)
68	Local SMR #08 (QT)	EA Block A* (10 ch)	Regional Block X* (20 ch)
69	Local SMR #09 (QT)	EA Block A* (10 ch)	EA Block A* (10 ch)
70	Local SMR #10 (QT)	EA Block A* (10 ch)	EA Block A* (10 ch)
71	Local SMR #11 (QT)	EA Block B* (10 ch)	EA Block B* (10 ch)
72	Local SMR #12 (QT)	EA Block B* (10 ch)	EA Block B* (10 ch)
73	Local SMR #13 (QT)	EA Block B* (10 ch)	EA Block C* (10 ch)
74	Local SMR #14 (QT)	EA Block B* (10 ch)	EA Block C* (10 ch)
75	Local SMR #15 (QT)	EA Block B* (10 ch)	EA Block D* (10 ch)
76	Local SMR #16 (QT)	EA Block B* (10 ch)	EA Block D* (10 ch)
77	Local SMR #17 (QT)	EA Block B* (10 ch)	EA Block E* (5 ch)
78	Local SMR #18 (QT)	EA Block B* (10 ch)	EA Block F* (5 ch)
79	Local SMR #19 (QT)	EA Block B* (10 ch)	EA Block G* (5 ch)
80	Local SMR #20 (QT)	EA Block B* (10 ch)	EA Block H* (5 ch)
81-90		(Contiguous Allocation Omitted)	
91	Local SMR #01 (QT)	EA Block C* (10 ch)	Regional Block V* (10 ch)
92	Local SMR #02 (QT)	EA Block C* (10 ch)	Regional Block V* (10 ch)
93	Local SMR #03 (QT)	EA Block C* (10 ch)	Regional Block W* (10 ch)
94	Local SMR #04 (QT)	EA Block C* (10 ch)	Regional Block W* (10 ch)
95	Local SMR #05 (QT)	EA Block C* (10 ch)	Regional Block X* (20 ch)
96	Local SMR #06 (QT)	EA Block C* (10 ch)	Regional Block X* (20 ch)
97	Local SMR #07 (QT)	EA Block C* (10 ch)	Regional Block X* (20 ch)
98	Local SMR #08 (QT)	EA Block C* (10 ch)	Regional Block X* (20 ch)
99	Local SMR #09 (QT)	EA Block C* (10 ch)	EA Block A* (10 ch)
100	Local SMR #10 (QT)	EA Block C* (10 ch)	EA Block A* (10 ch)
101	Local SMR #11 (QT)	EA Block D* (10 ch)	EA Block B* (10 ch)
102	Local SMR #12 (QT)	EA Block D* (10 ch)	EA Block B* (10 ch)
103	Local SMR #13 (QT)	EA Block D* (10 ch)	EA Block C* (10 ch)
104	Local SMR #14 (QT)	EA Block D* (10 ch)	EA Block C* (10 ch)
105	Local SMR #15 (QT)	EA Block D* (10 ch)	EA Block D* (10 ch)
106	Local SMR #16 (QT)	EA Block D* (10 ch)	EA Block D* (10 ch)
107	Local SMR #17 (QT)	EA Block D* (10 ch)	EA Block E* (5 ch)

**Comparison of 220 MHz Channel Allocation Plans
(Existing Non-Contiguous Channels Only)**

Chan No	Current Allocation	Proposed (3d NPRM)	Composite Example
108	Local SMR #18 (QT)	EA Block D* (10 ch)	EA Block F* (5 ch)
109	Local SMR #19 (QT)	EA Block D* (10 ch)	EA Block G* (5 ch)
110	Local SMR #20 (QT)	EA Block D* (10 ch)	EA Block H* (5 ch)
111-120		(Contiguous Allocation Omitted)	
121	Local SMR #01 (QT)	EA Block E* (5 ch)	Regional Block V* (10 ch)
122	Local SMR #02 (QT)	EA Block E* (5 ch)	Regional Block V* (10 ch)
123	Local SMR #03 (QT)	EA Block E* (5 ch)	Regional Block W* (10 ch)
124	Local SMR #04 (QT)	EA Block E* (5 ch)	Regional Block W* (10 ch)
125	Local SMR #05 (QT)	EA Block E* (5 ch)	Regional Block X* (20 ch)
126	Local SMR #06 (QT)	EA Block F* (5 ch)	Regional Block X* (20 ch)
127	Local SMR #07 (QT)	EA Block F* (5 ch)	Regional Block X* (20 ch)
128	Local SMR #08 (QT)	EA Block F* (5 ch)	Regional Block X* (20 ch)
129	Local SMR #09 (QT)	EA Block F* (5 ch)	EA Block A* (10 ch)
130	Local SMR #10 (QT)	EA Block F* (5 ch)	EA Block A* (10 ch)
131	Local SMR #11 (QT)	EA Block G* (5 ch)	EA Block B* (10 ch)
132	Local SMR #12 (QT)	EA Block G* (5 ch)	EA Block B* (10 ch)
133	Local SMR #13 (QT)	EA Block G* (5 ch)	EA Block C* (10 ch)
134	Local SMR #14 (QT)	EA Block G* (5 ch)	EA Block C* (10 ch)
135	Local SMR #15 (QT)	EA Block G* (5 ch)	EA Block D* (10 ch)
136	Local SMR #16 (QT)	EA Block H* (5 ch)	EA Block D* (10 ch)
137	Local SMR #17 (QT)	EA Block H* (5 ch)	EA Block E* (5 ch)
138	Local SMR #18 (QT)	EA Block H* (5 ch)	EA Block F* (5 ch)
139	Local SMR #19 (QT)	EA Block H* (5 ch)	EA Block G* (5 ch)
140	Local SMR #20 (QT)	EA Block H* (5 ch)	EA Block H* (5 ch)
141-200		(Contiguous Allocation Omitted)	