

"The Premiere Association Of Choice In Wireless Communications"

NPPCA

NATIONAL PAGING & PERSONAL COMMUNICATIONS ASSOCIATION

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The NPPCA Comments In Response to the Matter Before the Federal Communications Commission

Section 257

**Proceeding to Identify and Eliminate Market Entry Barriers for Small Businesses
GN Docket No. 96-113**

Submitted September 27, 1996

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Market Entry Barrier Comments
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The matter before the FCC to identify and eliminate market entry barriers for small businesses in the telecommunications industry will require the Commission to look beyond the obvious/facile factors that are often expressed by many. The lack of access to capital, the difficulty in obtaining credit and time-delayed payment options, the issue of discouraging remarks and negative attitudinal reception to business propositions promoted, by minorities, women and small businesses are the reasons that were stated to us by a large number of small businesses that we talked to in doing research for our comments on this issue.

Although we feel that the three aforementioned justifications are real and accurately typify the overall problem experienced by small businesses seeking to gain entry into the telecommunications industry, we also recognize that many of the problems experienced are intrinsic to the industry and can be traced to the evolution of the industry.

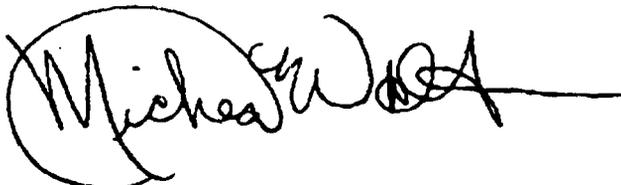
What we found in analyzing the situations from a cause and effect standpoint and seeking to craft a set of action items and steps to address the problems was more of a sociologists perspective of the history and evolution of the industry itself. What is relevant in formulating a plan for eliminating the market entry barriers in the telecommunications industry is an understanding of the chronological history of the technology and business opportunities of the industry.

To state our position succinctly, there are barriers to entering the telecommunications industry experienced by small businesses, women and minorities. Some of the instances are overt and borderline between discrimination and fear. Some of the examples are nascent and institutional. Some of the citings are inadvertent and stem from insensitivity in dealing with smaller businesses.

We'd like to conclude our comments by adding that in our discussions with some of the larger, dominant corporations in the industry, all were interested in working with us to identify and eliminate market entry barriers to the telecommunications industry and would commit resources to achieving the end of a more harmonious relationship between the small and dominant companies of the telecommunications industry.

It is our hope that the NPPCA comments will be received and viewed as helpful and supportive of actions by the Commission to continue to craft rules, policies and procedures that aim to make the US telecommunications industry business opportunities accessible to all sizes of companies.

Respectfully submitted by,

A handwritten signature in black ink, appearing to read "Micheal Walker", with a long horizontal flourish extending to the right. The signature is written over a faint circular stamp.

Micheal Walker
Executive Director