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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

SEP 27 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Section 257 Proceeding to)
Identify and Eliminate Market)
Entry Barriers for Small Businesses)

GN Docket No. 96-113

To: The Commission

DOCKET FILE COPY ORIGINAL

COMMENTS OF THE
AMERICAN MOBILE TELECOMMUNICATIONS ASSOCIATION, INC.

Respectfully submitted,

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ASSOCIATION, INC.

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The American Mobile Telecommunications Association, Inc. ("AMTA" or "Association"), pursuant to Section 1.415 of the Federal Communications Commission ("FCC" or "Commission") Rules and Regulations, respectfully submits its Comments in the above-entitled proceeding.¹ AMTA agrees with the assessment by the Commission and Congress that small business has played a vital role in developing a national telecommunications industry that is among the nation's most robust and innovative market segments. Because the Association is convinced that the regulatory framework adopted by the Commission will largely dictate the level of small business participation in the future, and because AMTA has certain concerns regarding recent FCC actions in this respect, the Association is pleased to have this opportunity to assist the FCC in identifying and eliminating market entry barriers for small businesses.

I. INTRODUCTION.

1. AMTA is a nationwide, non-profit trade association dedicated to the interests of the specialized wireless communications industry. The Association's members include trunked and conventional 800 MHz and 900 MHz SMR operators, licensees of wide-area SMR systems, and commercial licensees in the 220 MHz band. These members provide commercial wireless services throughout the country and include a significant number of entities that would qualify as "small business" under even the most stringent definition. Thus, AMTA and its members have a direct and vital interest in the FCC's decisions in this proceeding.

¹ 47 C.F.R. § 1.45; Notice of Inquiry, GN Docket No. 96-113, 11 FCC Rcd 6280 (1996).

II. SUMMARY.

2. The instant Notice is one facet of the Commission's response to the Congressional directive in the recently enacted Telecommunications Act of 1996² to conduct a proceeding:

for the purpose of identifying and eliminating, by regulations pursuant to its authority under this Act...market entry barriers for entrepreneurs and other small businesses in the provision and ownership of telecommunications services and information services, or in the provision of parts or services to providers of telecommunications services and information services.³

The Notice defines "market entry barriers" to include:

obstacles that deter individuals from forming small businesses, barriers that impede entry into the telecommunications market by existing small businesses, and obstacles that small telecommunications businesses face in providing service or expanding within the telecommunications industry....⁴

The Notice also indicates that the record in this and related proceedings will be useful in enabling the FCC to devise means by which the agency may "disseminate licenses for auctionable spectrum-based services to small businesses....⁵

3. In an effort to develop a record on which the FCC can make prudent decisions regarding these matters, the NOI poses a series of questions seeking information relating to the size and structure of its constituent licensees, the types of services they provide, the geographic areas in which they provide them, their financing sources and obstacles, operational and regulatory impediments they have encountered, and their relationships with potential customers,

² Telecommunications Act of 1996, Pub. L. No. 1044-104, 110 Stat. 56 (1996) ("1996 Act").

³ 47 U.S.C. § 257(a).

⁴ NOI at ¶ 4.

⁵ 47 U.S.C. § 309(j).

suppliers, and financiers, with their competitors, and with the government itself, including the FCC.⁶ The Notice also urges parties to provide specific information regarding difficulties they have encountered in securing adequate capital to fund their desired level of participation in the telecommunications industry.⁷

4. Additionally, the NOI solicits information to assist the agency in identifying any obstacles that are unique to small telecommunications businesses owned by women and minorities⁸, as well as remedial measures that might address those barriers within constitutionally permitted parameters.⁹

5. The primary focus of AMTA's Comments in this proceeding will be on identifying barriers faced by the small businesses the Association represents in gaining entry into a desired marketplace, in providing service once entry has been achieved, and in expanding their operations. The Association has already advised the FCC in several proceedings that, in the services with which AMTA is most familiar, it has been unable to identify either entry barriers unique to small businesses owned by minorities or females or a pattern of present or past discrimination against these specific groups adequate to satisfy the strict scrutiny standard articulated in Adarand^{10, 11}. Although AMTA recognizes that women and minorities are

⁶ NOI at §§ 24-5.

⁷ Id. at § 26.

⁸ Id. at §§ 28-39.

⁹ Id. at §§ 40-58.

¹⁰ Adarand Constructors, Inc. v. Pena, 115 S.Ct. 2097 (1995).

underrepresented in terms of the specialized wireless communications community, and in telecommunications services generally, it believes the cause to be broadly societal, rather than specifically discriminatory in this marketplace. The adoption of regulatory measures crafted to enhance small business participation in the telecommunications industry can also be expected to promote increased system ownership by members of such groups.

III. THE COMMISSION HAS AN OPPORTUNITY TO ADOPT CMRS RULES THAT WILL MINIMIZE MARKET ENTRY BARRIERS FOR LARGE SEGMENTS OF THE SMALL BUSINESS COMMUNITY.

A. The AMTA Membership Is Representative Of Small Business Interests.

6. AMTA is uniquely qualified to address the market entry barriers for small Commercial Mobile Radio Service ("CMRS") and Private Mobile Radio ("PMRS") businesses. The Association's membership is comprised largely of entities that qualify for that classification under the definition used by the Small Business Administration ("SBA"),¹² or any of the definitions employed by the Commission in various rulemaking proceedings.¹³ Based on the Association's ongoing analysis of the economic makeup of its members, and a recent survey in response to the NOI, AMTA believes that approximately half of its operator members have

¹¹ Second Memorandum Opinion and Order and Third Notice of Proposed Rulemaking, PR Docket No. 89-552, 10 FCC Rcd 3356 ¶¶ 157-160 (1995) (220 MHz Proceeding); Second Order on Reconsideration and Seventh Report and Order, PR Docket No. 89-553, 10 FCC Rcd 1568 (1995) (900 MHz Proceeding); and First Report, Eighth Report and Order, and Second Further Notice of Proposed Rulemaking, PR Docket No. 93-144, 11 FCC Rcd 1463 ¶¶ 237-256 and 372-385 (1995) (800 MHz Proceeding).

¹² The SBA defines a small business as one that, together with its affiliates, has no more than \$6 million net worth, and after federal income taxes (excluding any carry-over losses), does not have in excess of \$2 million in annual profits for each of the previous two years. See, Second Report and Order, PP Docket No. 93-253, 9 FCC Rcd 2348, ¶¶ 2395-6 (1994) ("Competitive Bidding 2nd R&O").

¹³ See, e.g., NOI at pp 9-10.

annual gross revenues of less than \$1 million, and another forty percent (40%) have less than \$15 million. Only a very small number of the Association's members have annual gross revenues in excess of \$50 million, and almost all that fall within that category are CMRS equipment suppliers. Moreover, even the relatively small annual revenues reported by members typically include revenues received from activities ancillary or unrelated to the provision of telecommunications services.

7. A significant percentage of AMTA's members are small businesses in aspects other than gross annual revenues. For example, based on the survey, substantially more than fifty percent (50%) of the membership have fewer than fifteen full-time and part-time employees. More than half serve fewer than one thousand subscribers on their systems; approximately another one-quarter have between one thousand and five thousand system subscribers. Almost none serve more than twenty thousand customers although the 800 MHz SMR industry has been in existence for two decades and the 900 MHz service has been operational for ten years. The most recent AMTA/EMCI survey reported that the entire SMR industry had just over two million subscribers which, with the notable exception of Nextel Communications, Inc. ("Nextel"), are largely distributed over a very substantial number of small businesses.

B. Previous FCC Efforts To Deregulate The Heretofore Private Carrier Industry Were Successful.

8. In many respects, the SMR industry, whether at 800 MHz, 900 MHz or 220 MHz, has been ideally suited for small business participation. The capital investment required for these systems was relatively small and typically was financed by the equipment vendor. Initial licenses were issued on a first-come, first-served basis with minimal regulatory

involvement by the applicant. The FCC's rules governing entry promoted the participation of numerous competitors in each marketplace and rewarded successful performance, i.e. documented service to the public, with incremental additions of spectrum to increase capacity. The most significant barrier to entry was not knowing about the opportunities since private carrier systems were not heavily publicized even within the trade press.

9. This industry flourished as the FCC eliminated a number of overly burdensome, or simply unnecessary, Part 90 licensing and operational requirements during the late 1980s and early 1990s. The specialized wireless communications community found the Commission staff, both in Washington and in Gettysburg, markedly responsive to general industry objectives and to the needs of individual entities. While the quest for a perfect balance between essential governmental oversight and optimal marketplace freedom is ongoing in a dynamic industry, substantial progress had been made in removing regulatory "underbrush" and allowing operators to respond promptly to the needs of their customers. Thus, these small businesses have enjoyed the benefits of previous Commission deregulatory efforts, and recognize the vital importance FCC decisions can have on their ability to enter markets and expand their businesses.

C. **The Conversion From PMRS To CMRS Status Should Not Increase Market Entry Barriers For Small Businesses.**

10. The 1993 amendments to the Communications Act fundamentally altered the regulatory landscape for heretofore private carriers.¹⁴ First, Congress determined that land mobile systems would be reclassified as CMRS or PMRS, and directed the FCC to consider which heretofore private systems should be considered CMRS, or common carrier services,

¹⁴ Omnibus Budget Reconciliation Act of 1993, Pub. L. No. 103-66, 107 Stat. 312 (1993) ("Budget Act").

pursuant to the statutory definition.¹⁵ Further, the amendments required the Commission to modify its rules to achieve "regulatory symmetry" among "substantially similar" services.¹⁶ Finally, the Commission was granted authority to award licenses pursuant to competitive bidding procedures, *i.e.*, auctions, in defined circumstances, including when selecting among mutually exclusive CMRS applicants for new authorizations.¹⁷

11. Each of these determinations has had or is likely to have a profound impact on the level of entry barriers for small businesses. The broad policy decisions made by the FCC in implementing these and the 1996 statutory directives, rather than individual rule provisions, will be key in determining the likelihood of significant small business participation in the wireless future. AMTA appreciates fully that this new paradigm has required reconsideration, and in certain instances restructuring, of the regulatory framework governing these services. Although change sometimes is not easy, it may also present unanticipated opportunities. The Association believes that the Commission has the responsibility for ensuring that small businesses as well as large will have the ability to pursue those opportunities, and encourages the FCC to use this and other proceedings as vehicles to advance that effort.

¹⁵ Budget Act § 6002(d)(3).

¹⁶ *Id.* § 6002(d)(3)(B).

¹⁷ New Section 309(j), 47 U.S.C. §§ 151-713.

1. Auctions As A Market Entry Barrier.

12. The Commission will not be surprised to learn that spectrum auctions are at the very top of many small business lists of market entry barriers. For example, one party responded to AMTA's survey with the following statement:

Auctioning the airwaves and depriving legitimate wireless businesses of spectrum is on a parallel with auctioning the skies to the airlines and the waterways to the maritime shippers and fisherman! The end results will be higher consumer costs due to the costs of licenses, and a monopoly providing the services.

While the position articulated by that individual is extreme, it is by no means atypical. A significant number of SMR operators continues to believe that auctions will present an insurmountable barrier to their continued, successful provision of service. They also question whether the Commission has elected to use auctions even in instances in which alternative licensee selection methods would be statutorily permissible, or even preferable.

13. More than ninety percent (90%) of the respondents to AMTA's survey indicated that the Commission has not yet found a fully effective vehicle for small business participation in spectrum auctions.¹⁸ Nonetheless, AMTA's members are business people accustomed to having to purchase in a free marketplace the resources they need to compete successfully.

¹⁸ AMTA recognizes that small business bidders won twenty-six percent (26%) of the 900 MHz SMR licenses auctioned earlier this year. Without diminishing the FCC's effort to encourage small business participation in that process, the Association questions whether it would be realistic to anticipate even this level of successful participation in future auctions. That percentage reflects both the presence of numerous small business as incumbents in the key urban portions of the licenses being awarded and the fact that there was no provision for auction winners to "relocate" incumbents to other spectrum. A substantial portion of the 263 licenses awarded to small businesses were MTA (geographic) authorizations acquired by the incumbent Designated Filing Area ("DFA") licensee whose DFA system already covered much of the densely populated areas in the MTA. Many of the rest were for the very smallest, least populated MTAs.

Although a majority of the respondents indicated that they had difficulty in accessing capital vis-a-vis larger organizations, in part because of their smaller asset bases, and while most believe that they are unable to secure terms and conditions comparable to those of much larger competitors, there is little or no evidence that they feel the FCC is an appropriate forum in which to address those broad economic realities. Many are prepared to purchase the spectrum they need as well, if they have a fair opportunity to compete for that resource. They consider "entrepreneur's blocks" that limit participation to genuinely small business, defined on a service-by-service basis considering factors such as size of spectrum awards and expected capital requirements,¹⁹ as a key element in addressing what is otherwise a significant barrier to entry.²⁰ Tiered bidding credits and, in particular, installment payments are considered valuable as well, but are perceived to have only a relatively limited impact on breaching entry barriers in non-entrepreneur's block auctions.

14. Another critical factor in determining whether auctions constitute barriers to small business entry is whether the resources consumed in acquiring the spectrum outweigh its value. This will depend largely on the duration of the auction itself and the rules governing its

¹⁹ A substantial majority of the respondents agreed with the use of a gross revenue test for determining small business status, although many remain concerned that the FCC's rules are not adequate to prevent indirect participation by much larger entities. Other parties suggested using number of employees, number of subscribers, net revenues, market share, and even physical size of business operation. Finally, there was support for limiting participation in auctions where the spectrum is encumbered to incumbents only.

²⁰ Because these parties are incumbents, as well as small businesses, they generally support the right of all incumbents to participate in auctions wherein rights to so-called "white space" adjacent to already authorized facilities are at issue. See, e.g., Joint Reply Comments of SMR Won, The American Mobile Telecommunications Association and Nextel Communications, Inc. on the Second Further Notice of Proposed Rule Making, PR Docket No. 93-144 (March 1, 1996) ("Consensus Position Reply Comments").

progress. AMTA has already advised the FCC that simultaneous multiple round auctions that run for months and, toward the end, may require participation in ten or more rounds a day impose extraordinary burdens on small businesses.²¹ Of the almost seventy percent (70%) of AMTA's respondents that reported having fifteen or fewer employees, AMTA estimates that more than half employ fewer than five persons. Auctions that require daily oversight for months, as well as essentially fulltime involvement toward the end, constitute a significant barrier to entry for companies with fewer than a handful of people, each of which presumably is already fully and productively employed.

15. Finally, auctions are most manageable, and perhaps are only manageable, when essentially fungible products are being sold. In the context of spectrum auctions, this has directed the FCC's decision to subdivide the available frequencies and the county into discrete, comparable spectrum blocks and to issue geographic licenses to auction winners. This is not to diminish, in any way, the clear benefits of holding a geographic license. The right to deploy all authorized frequencies in a configuration determined to be optimal by the licensee based on the demands of its customers provides a level of regulatory flexibility that most licensees would embrace. Nonetheless, while this approach may well be optimal when unencumbered spectrum is being awarded, it presents difficult issues when auctioned licenses are being overlaid on an encumbered spectrum landscape in which existing licenses were not awarded on an equivalent geographic or frequency basis. Incumbent operators often have systems that do not fit neatly within the FCC-defined auction world. An incumbent wishing to participate may find that it

²¹ Comments of the American Mobile Telecommunications Association, Inc., PR Docket No. 93-144, p. 31 (Feb. 15, 1996).

must bid both on more frequencies and more territory than it actually needs or wants to secure the expansion opportunity it does desire.

16. As the FCC realizes, many small businesses dropped out of the 900 MHz auction process. AMTA has been advised by a number of them that the costs of acquiring an entire MTA were simply too high, although they believe they could have, and would have, bought the spectrum rights for the more limited geographic area in which they had a realistic opportunity to provide cost-effective service. When the entry cost exceeds what the prospective participant can justify economically, that entity must forego participating. AMTA appreciates that that is the nature of an auction, but believes that the right to partition and/or disaggregate a geographic license will provide a meaningful option for greater auction participation by individual or consortia of small businesses.

17. AMTA has already commented on these points in various service-specific rule making proceedings.²² The Association welcomes continued communication with the Commission on these matters, and hopes that such discussions will be reflected in the participant limitations and design concepts used for future auctions.

2. Over-inclusive "Covered" SMR Definition As A Market Entry Barrier.

18. Almost three-quarters of the respondents to AMTA's survey identified lack of available staff and resources to handle FCC regulatory compliance or participate in FCC proceedings as an example of difficulties encountered by small businesses. The FCC should note that this survey was completed before the end of the three-year transition period for

²² AMTA Comments, PR Docket No. 93-144 (Feb. 28, 1996); AMTA Comments, PR Docket No. 93-144 (Mar. 16, 1996).

conversion from PMRS to CMRS status.²³ That percentage likely would have been higher had the participants been fully cognizant of the range of regulatory responsibilities the FCC has recently imposed on so-called "covered SMRs".

19. The issue of which previously private carrier licensees would be classified as CMRS, as well as the obligations that would be imposed on those so classified, has been a subject of debate since enactment of the Budget Act amendments in 1993. Contrary to AMTA's arguments that Congress intended to include only those systems that were or had the potential to become viable competitors to cellular and Personal Communications Services ("PCS"), the FCC declared itself statutorily compelled to define all interconnected private carrier systems, including all interconnected SMRs, as CMRS.²⁴ The Commission specifically rejected the idea of distinguishing among SMRs on the basis of "system capacity, frequency reuse, or other technology-dependent aspects of system operations" or on the size of the geographic area being served.²⁵

20. The Commission now is in the process of determining what CMRS status will mean in a variety of proceedings relating to such licensees' operational and technical obligations. Although these rule makings involve widely varying technical and operational issues, the FCC seemingly has settled on a consistent delineation between entities providing broadband PCS, cellular and "covered SMR" service, versus narrowband PCS, data-only and one-way or stored

²³ Budget Act § 6002(d)(3); Second Report and Order, GN Docket No. 93-252, 9 FCC Rcd 1418, ¶ 280 (1994) ("CMRS Second R&O").

²⁴ CMRS Second R&O at ¶ 90.

²⁵ Id. at ¶ 92.

voice CMRS offerings. Licensees in the first class are subject to these newly adopted rules, while those in the latter category are exempt.

21. AMTA is pleased to note that the FCC has properly recognized that:

Because they do not compete substantially with cellular and broadband PCS providers, local SMR licensees offering mainly dispatch services to specialized customers in a non-cellular system configuration...are not covered...²⁶

However, the FCC has also determined that "covered SMR providers" will include 800 MHz and 900 MHz licensees that hold geographic area licenses, as well as incumbent wide-area SMR licensees, defined as those who have obtained extended implementation authorizations in the 800 MHz or 900 MHz SMR service either by waiver or under Section 90.627, if licensees in either of those categories offer real-time, two-way switched voice service that is interconnected with the public switched network.²⁷

22. Unfortunately, and contrary to the FCC's express intention, the definition of covered SMR will include many licensees offering primarily local, dispatch service to specialized customers in a non-cellular system configuration. For example, as discussed previously, a number of 900 MHz auction participants, and a significant percentage of successful small business bidders, were incumbents seeking to protect their ongoing operations by acquiring the right to use the frequency block throughout the MTA. They had no choice but to secure a geographic license if they wanted to ensure any expansion opportunity on their channels and

²⁶ First Report and Order, CC Docket No. 94-54, 11 FCC Rcd _____, ¶ 19 (rel. July 12, 1996).

²⁷ Id. Since CMRS systems are, by definition, interconnected with the public switched network, there was no need to include that language in the definition of covered SMRs. SMRs that are not interconnected are classified as PMRS and clearly are exempt from these requirements.

prevent potential interference from unrelated, co-channel MTA licensees, since that was the only type available. However, obtaining a geographic license will not put them in a competitive posture vis-a-vis broadband PCS or cellular under any reasonable analysis.

23. The geographic license awarded is for only ten (10) 12.5 kHz channels, for a grand total of 250 kHz of spectrum. By comparison, each cellular licensee has **25 MHz** and broadband PCS operators will have either **10 or 30 MHz** each. It is not possible for a 900 MHz MTA operator to deploy a cellular-like system configuration with the amount of spectrum authorized, yet such licensees will be classified as covered SMR systems under the FCC definition, and will be subject to the full panoply of regulation considered appropriate for the cellular and PCS industries.

24. Those obligations already include resale,²⁸ roaming,²⁹ E911,³⁰ telephone number portability,³¹ and RF radiation guidelines³². Collectively, these rules will impose significant financial burdens on covered licensees. Some, such as E911 and telephone number portability, simply may be beyond the technical capabilities of the systems that affected SMR licensees currently use or intend to use in the future. Conversion to technologies able to comply with these requirements, even if possible, would constitute a virtually insurmountable market entry

²⁸ First Report and Order, CC Docket No. 94-54, 11 FCC Rcd ____ (rel. July 12, 1996).

²⁹ Second Report and Order, CC Docket No. 94-54, 11 FCC Rcd ____ (rel. Aug. 15, 1996).

³⁰ Report and Order, CC Docket No. 94-102, 11 FCC Rcd ____, (rel. Aug. 2, 1996).

³¹ First Report and Order, CC Docket No. 95-116, 11 FCC Rcd ____, (rel. July 2, 1996).

³² Report and Order, ET Docket No. 93-62, 11 FCC Rcd ____ (rel. Aug. 1, 1996).

be used by the Commission in future proceedings as well, such as that involving further forbearance from CMRS regulation, and will thereby impose further regulatory costs.³³

25. The current over-inclusive definition of covered SMR will constitute a major market entry barrier in the future. In fact, many AMTA members have already advised the Association that they anticipate removing their interconnection capability rather than assuming the regulatory obligation associated with that status. Those parties will not simply be discouraged from expanding their services; they will actually reduce the scope of their offerings, to the ultimate detriment of their subscribers. It is difficult to imagine a regulatory action more inimical to the interests of small business.

26. AMTA intends to address this issue in greater detail in Petitions for Reconsideration in these proceedings, and to offer an alternative covered SMR definition that it believes more accurately reflects the delineation the FCC has stated it was attempting to achieve. Adoption of a more limited, but competitively appropriate definition will be a very significant step by the FCC to dismantle market entry barriers for small businesses in the CMRS industry.

IV. CONCLUSION.

27. For the reasons described above, AMTA encourages the Commission to proceed expeditiously to remove market entry barriers against small business participation in CMRS and other telecommunications services, consistent with the views expressed herein.

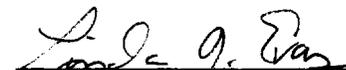
³³ Notice of Proposed Rulemaking, GN Docket No. 94-33, 9 FCC Rcd 2164 (1994).

CERTIFICATE OF SERVICE

I, Linda J. Evans, a secretary in the law office of Lukas, McGowan, Nace & Gutierrez, hereby certify that I have, on this 27th day of September, 1996, caused to be mailed a copy of the foregoing Comments to the following:

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