

EX PARTE OR LATE FILED

LUKAS, MCGOWAN, NACE & GUTIERREZ

CHARTERED  
1111 NINETEENTH STREET, N.W.  
SUITE 1200  
WASHINGTON, D.C. 20036  
(202) 857-3500

RUSSELL D. LUKAS  
GERALD S. MCGOWAN  
DAVID L. NACE  
THOMAS GUTIERREZ  
ELIZABETH R. SACHS  
GEORGE L. LYON, JR.  
PAMELA L. GIST  
DAVID A. LAFURIA  
TERRY J. ROMINE  
MARCI E. GREENSTEIN<sup>+</sup>  
MARJORIE GILLER SPIVAK  
J. JUSTIN McCLURE<sup>+</sup>  
MARILYN SUCHECKI MENSE  
PAMELA GAARY HOLRAN  
B. LYNN F. RATNAVALE

<sup>+</sup> NOT ADMITTED IN D.C.

CONSULTING ENGINEERS  
THOMAS G. ADCOCK, P.E.  
MEHRAN NAZARI  
ALI KUZEHKANANI  
SHAHRAM HOJATI, D.SC.  
LEROY A. ADAM  
LEILA REZANAVAZ  
FARID SEYEDVOSOGHI

OF COUNSEL  
JOHN J. MCAVOY  
J.K. HAGE III<sup>+</sup>

TELECOPIER  
(202) 842-4485

Email: [lmng@fcclaw.com](mailto:lmng@fcclaw.com)  
<http://www.fcclaw.com>

WRITER'S DIRECT DIAL

September 26, 1996

VIA HAND DELIVERY

(202) 828-9471

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

RE: CC Docket No. 94-54, 94-102, 95-116 ✓  
ET Docket No. 93-62

RECEIVED

SEP 26 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

EX PARTE FILING

Dear Mr. Caton:

On behalf of the American Mobile Telecommunications Association, Inc. ("AMTA"), and in accordance with Section 1.1206(a)(2) of the Federal Communications Commission Rules and Regulations, we hereby notify the Commission that an oral ex parte presentation was made by AMTA to the Offices of Deputy Chief Rosalind K. Allen, Associate Bureau Chief Karen Gulick and Division Chief Sandra Danner, all of the Wireless Telecommunications Bureau, on September 25, 1996. The presentation summarized AMTA's recommendations regarding a refinement of the "covered SMR provider" definition included in the above-referenced proceedings, as detailed in AMTA's previously filed Comments in those proceedings. AMTA's recommended definition of "covered SMR Providers" is attached hereto for the Commission's convenience.

AMERICAN MOBILE TELECOMMUNICATIONS  
ASSOCIATION, INC.

By:



Elizabeth R. Sachs  
Its Attorney

Enclosure

## PROPOSED DEFINITION FOR COVERED SMR SERVICES

Add new definition paragraph to § 20.3

*Mobile Telephone Switching Facility.* An electronic switching system that is used to terminate mobile stations for purposes of interconnection to each other and to trunks interfacing with the public switched network.

Modify definitions - §§20.3 and 20.12

*Incumbent Wide Area SMR Licensees.* Licensees who have obtained extended implementation authorizations in the 800 MHz or 900 MHz service, either by waiver or under Section 90.629 of these rules, and who offer ~~real-time~~ two way interconnected voice service using a mobile telephone switching facility. ~~that is interconnected with the public switched network.~~

§ 20.12(a)

This Section is applicable only to providers of Broadband Personal Communications Services (Part 24, Subpart E of this chapter), providers of Cellular Radio Telephone Service (Part 22, Subpart H of this chapter), providers of Specialized Mobile Radio Services in the 800 MHz and 900 MHz bands that hold geographic licenses (included in Part 90, Subpart S of this chapter) and who offer ~~real-time~~ two way interconnected voice service using a mobile telephone switching facility. ~~that is interconnected with the public switched network~~, and Incumbent Wide Area SMR Licensees.