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OCT 18 1996

Federal Communications Commission
Office of Secretary

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Ex Parte Presentation - PCS Development Corporation in the Matter of Implementation of Section 309(j) of the Communications Act - Competitive Bidding Narrowband PCS (PP Docket No. 93-253) and Amendment of the Commission's Rules to Establish New Narrowband Personal Communications Services (GEN Docket No. 90-314, ET Docket No. 92-100)

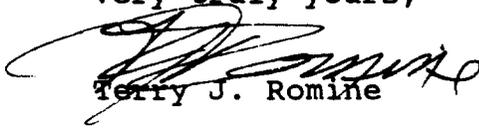
Dear Mr. Caton:

Pursuant to Section 1.1206(a)(1) of the Commission's rules, this letter, in duplicate, is to notify the Commission that representatives of PCS Development Corporation ("PCSD") made an oral ex parte presentation to the following persons: Jackie Chorney, Rudy Baca, David Siddall, and Suzanne Toller, in connection with the above-referenced matter.

Enclosed herewith is a written summary of the matters presented.

Kindly contact the undersigned, should the Commission have any questions in regard to this matter.

Very truly yours,


Terry J. Romine

Enclosures

cc: Jackie Chorney
Rudy Baca
David Siddall
Suzanne Toller

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POSID
CORPORATION

Key Milestones

1999

• **1999** - The first year of the program, with a focus on the development of the curriculum and the recruitment of students.

• **2000** - The first cohort of students begins their studies.

• **2001** - The program is officially recognized by the state.

• **2002** - The program expands to include a second cohort.

• **2003** - The program is awarded accreditation.

• **2004** - The program is recognized as a national leader.

• **2005** - The program is awarded a national award.

• **2006** - The program is recognized as a national leader.

• **2007** - The program is awarded a national award.

• **2008** - The program is recognized as a national leader.

• **2009** - The program is awarded a national award.

2010

• **2010** - The program is recognized as a national leader.

• **2011** - The program is awarded a national award.

• **2012** - The program is recognized as a national leader.

• **2013** - The program is awarded a national award.

• **2014** - The program is recognized as a national leader.

• **2015** - The program is awarded a national award.

• **2016** - The program is recognized as a national leader.

• **2017** - The program is awarded a national award.

• **2018** - The program is recognized as a national leader.

• **2019** - The program is awarded a national award.

• **2020** - The program is recognized as a national leader.

PCSD Position on NPCS Regulatory Environment

- Spectrum Allocation Rules
- Small Business Participation in Upcoming Auction
- “Post Adarand” D.E. Rules

PCSD

PCSD Supports the Original F.C.C. Proposal for NPCS Spectrum Allocation

- National, Regional, MTA, BTA mix.
- F.C.C. should maintain MTA/BTA's in upcoming NPCS auction.
 - Business plans based on rules.
 - Capital invested.
 - Allows carriers to optimize for individual needs.
 - PCSD intends to acquire additional spectrum capacity where needed.
 - Larger geographic licenses serve as barrier to entry.
 - F.C.C. auctions raise more net revenue with smaller geographic areas.
(e.g. Broadband, A & B vs. C, Narrowband, National vs. Regional.)
- All public comment on this topic support PCSD's position.

PCSD

The F.C.C. Should Increase Small Business Participation by Allowing Preferences to Apply to All Licenses in NPCS Auction

- Bid credits were worthless in required NPCS, but real in 900 mhz SMR.
- Only difference between regional NPCS and 900 mhz SMR was ability to use credits on all licenses (900 mhz SMR credit was actually less than regional NPCS - 10% vs. 40%.)
- Applying small business preferences to all licenses will increase small business participation and increase net revenues to the F.C.C.

PCSD

PCSD Requests Clarification that the Anticipated Narrowband D.E. Rules will Apply to All Narrowband Licensees

- Race and gender preferences were of no value. (AT&T paid \$80 million. PCSD paid \$90 million.)
 - PCSD has met all D.E. rules including control group and small business status.
 - Race and gender based D.E. status harms PCSD's ability to raise capital.
 - Increase regulatory risk factor.
 - Bond market required more equity.
 - Minority equity sources are not sufficient.
 - Given "Post Adarand" rules, and assuming no transfer of control of PCSD licenses, PCSD requests clarification that new Narrowband rules apply to all Narrowband licensees.
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PCSD