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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
)
Amendment of Part 95 of) WT Docket No. 95-47
the Commission's Rules to)
Allow Interactive Video)
and Data Service licensees)
to Provide Mobile Service)
to Subscribers)

To: The Commission

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JUN 26 1995
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COMMENTS

The IVDS licensees ("Licensees") hereby submit these Comments in response to the *Notice of Proposed Rule Making* released on May 5, 1995 (the "Notice") by the Commission in the above-captioned proceeding.^{1/} The Licensees support the Commission's proposal to allow IVDS licensees to provide mobile service to subscribers, as this will provide IVDS licensees with additional flexibility in the types of services they can offer, thereby increasing their ability to attract capital investment and add subscribers to this new service. The Licensees also strongly endorse the substantial relaxation of the Commission's 5-second duty cycle standard.^{2/} The Licensees believe that the addition of mobility and the elimination of the 5-second duty cycle will, together, dramatically enhance the viability of IVDS, incentivize investment in the IVDS industry and

^{1/} Attached as Schedule A is a list of the Licensees and the markets which they represent.

^{2/} See Rule Section 95.863.

expand the range of services and uses of IVDS spectrum. All of these objectives are consistent with the public interest.

I. INTRODUCTION

The Licensees are a group of IVDS licensees who were awarded licenses by the FCC pursuant to auctions held last summer. Over the course of the last eleven months, the Licensees have committed substantial resources in an effort to launch the first wave of wireless interactive services. Most of the Licensees have joined the IVDS Equipment Coalition ("Coalition"), an organization established to attract IVDS financing and equipment proposals. In the context of the Coalition and individually, the Licensees have explored numerous business plans, equipment options and market studies, and remain optimistic that IVDS will become a viable service. Today, however, the initiation of a viable IVDS service has been frustrated by a plethora of entry barriers -- access to capital, questions concerning the extent of consumer demand for certain services, equipment limitations and regulatory restrictions. The Licensees believe that the Commission's proposal will result in the expansion of the services that IVDS licensees can offer and the easing of technical restrictions will foster financial investment in IVDS. These results will facilitate innovation in equipment and services and, in general, provide the necessary environment for IVDS to become a viable, long-term service.

II. ALLOWING IVDS LICENSEES TO PROVIDE MOBILE SERVICE WILL BENEFIT THE PUBLIC INTEREST

1. As initially conceived, IVDS was intended to be a television-based family of services such as games, home shopping and other transactional uses. Now, however, the Licensees believe that the first substantial market for IVDS may be a series of niche services carefully designed to fulfill various specific consumer demands. The Commission's efforts to permit IVDS to transmit to and from mobile locations would create numerous uses for IVDS that are not currently available, such as sports updates to travelers or commuters, tracking package locations and confirming a child's safety. See EON Corporation ("EON"), Petition for Rulemaking, RM-8476, filed May 11, 1994 (hereinafter "Petition"). The Licensees also believes that the IVDS spectrum will be very useful for TV-based messaging for families and communities as well as for data applications such as meter reading, and the transmission of ATM and credit card verifications as well as stock quotes.

2. The Commission correctly recognized that "allowing IVDS licensees to provide ancillary mobile services would enhance telecommunication service offerings for consumers, producers, and new entrants, and encourage rapid deployment and growth of IVDS services." Amendment of Part 95 of the Commission's Rules to Allow Interactive Video and Data Service Licensees to Provide Mobile Services to Subscribers, Notice of Proposed Rule Making in WT Docket No. 95-47, FCC 95-158, released May 5, 1995, ¶ 7 (hereinafter "Notice"). This is consistent with the Commission's

goals of encouraging the development of innovative communications, which it emphasized when adopting rules to govern IVDS. See Amendment of Parts 0, 1, 2, and 95 of the Commission's Rules to Provide Interactive Video and Data Services, Report and Order, 7 FCC Rcd 1630 (1992).

3. The Commission also recognized that mobile service would facilitate public access to telecommunication services. Notice, ¶ 7. Accordingly, the Commission should not limit mobile service only to subscribers of fixed service because this would limit the number of subscribers who would utilize the service, contrary to the purpose of offering mobile service. The Licensees request that the Commission specifically determine that one may subscribe for mobile service without also subscribing for fixed service.

4. Mobile IVDS operations would also benefit the public interest by, in all likelihood, causing less interference to existing television stations. EON has asserted that mobile units can transmit with a maximum effective radiated power ("ERP") of 100 milliwatts, a power level significantly less than the presently-authorized maximum of 20 watts. Petition, p. 5. The Association for Maximum Service Television, Inc. has filed in support of EON's proposal to offer mobile IVDS operations, recognizing that any interference from mobile IVDS operations is highly unlikely and, under existing Commission Rules, any such interference would have to be quickly corrected by the IVDS provider.^{3/}

^{3/} See Rule Section 95.861. See also, letter dated May 25, 1994 from Julian L. Shepard, Vice President and General Counsel of The Association for Maximum Service Television, Inc.

5. The Licensees believe that it would be a mistake, however, for the Commission to limit the ERP of all RTUs designed to provide mobile service to 100 milliwatts. Mobile units would be located farther from the television receiver and no closer to the antenna than the presently-authorized set-top box and, accordingly, should be governed by the limitations established under Section 95.855 and 95.859. Moreover, limiting the ERP of all portable or fixed IVDS units to 100 milliwatts would unnecessarily restrict currently undiscovered uses for IVDS. As noted above, Section 95.861 of the Commission's Rules requires IVDS licensees to avoid interference with the reception of television stations operating on Channel 13. 47 C.F.R. § 95.861. Within this interference protection parameter, IVDS licensees should be provided with the opportunity to offer as many different services as technology and subscribers will allow, so that the full development of IVDS can be realized.

6. In addition, requiring all fixed and portable IVDS units to operate at 100 milliwatts will increase the cost of constructing IVDS systems exponentially because so many additional cells would have to be constructed to provide the same "footprint" as can currently be provided at higher power levels, permitted pursuant to Sections 95.855 and 95.859. There is no question that increased costs will be a significant barrier to entry, contrary to the public interest.

7. Further, power limits on IVDS mobile operation should be measured in terms of average power rather than peak power. In any system there are going to be power surges and decreases in power output. Under these real-world circumstances, average power more accurately depicts the overall RTU power output. Because IVDS licensees need to be able to accurately measure potential interference problems with the Channel 13 broadcast signal, an average power standard will provide a more accurate measure of system activity.

8. In addition, mobile-RTU-to-mobile-RTU communications should be permitted. Although one mobile application for IVDS could be to permit subscribers at itinerant locations to access information, products and services, mobile uses of IVDS should not be confined to such applications. IVDS licenses should be encouraged to promote a variety of applications for use on mobile systems.

**III. THE COMMISSION SHOULD NOT RESTRICT
IVDS LICENSEES TO A 5-SECOND DUTY CYCLE**

9. In the Notice, the Commission also proposed to apply the existing 5-seconds-per-hour duty cycle limitation to mobile IVDS operations. Notice, ¶ 2. The 5-second duty cycle significantly restricts the uses for which IVDS can be applied, both as a fixed service and as a mobile service. In addition, as noted above, the existing interference protections provided through Section 95.855 and 95.859 of the Commission's Rules provide Channel 13 broadcasters with more than sufficient protection against interference from IVDS operators. Accordingly, the 5-second duty

cycle is redundant and unnecessary.

10. It is also increasingly apparent that the 5-second duty cycle also operates as a ceiling on IVDS licensees ability to compete with other high-speed data providers. The licensee of the B side IVDS license for the Philadelphia PA MSA, Kingdon R. Hughes, has requested a waiver of the Commission's Rules restricting RTUs to a 5-second duty cycle, stating that his technically-feasible proposal to install RTUS on bank ATM machines necessitates a duty cycle larger than 5-seconds per hour. Kingdon R. Hughes, Petition for Rule Waiver, filed June 5, 1995, p. 4. The Licensees further understand that Hughes' proposed application would operate substantially more efficiently, thus saving money and allowing the provider to offer its services for less to consumers. Such a result is clearly in the public interest. The Licensees expect that certain of the applications which they are currently investigating may not be viable unless the 5-second duty cycles is waived or substantially relaxed.

11. As the Commission is well aware, IVDS is a new technology whose full potential is being developed on an ongoing basis. The Commission should not adopt rules to limit this new service, provided that any new uses comply with the Commission's requirements governing interference with broadcast Channel 13.^{4/}

^{4/} Though Hughes' Waiver Request covers only the areas outside of the predicted Grade B service contour of the local Channel 13 broadcaster, the Licensees seek the waiver or at least the relaxation of the 5-second duty cycle in all areas and believe that their obligation to protect all Channel 13 broadcasters from harmful interference is sufficient protection for the broadcaster's interest in this regard.

12. Finally, the Commission recently proposed no duty cycle limits in the 216-217 MHz band for auditory assistance and public safety systems. Accordingly, the Commission should not restrict IVDS licensees to a 5-second duty cycle.

**IV. IVDS WOULD BE BEST UTILIZED BY ALLOWING
MAXIMUM FLEXIBILITY OF THE SPECTRUM**

13. The Commission also sought comment on whether any restrictions should be placed on the types of ancillary mobile services that IVDS licensees would be permitted to offer. Notice, ¶ 10. The Licensees believe that ancillary service should be construed broadly. As noted previously, many possible uses for IVDS remain unknown, and the Commission should encourage the development and flexibility of this new service by not placing restrictions on the services that can be provided by IVDS within the allotted spectrum. For example, if IVDS licensees were permitted to provide interconnected service, subscribers would not be forced to purchase new equipment as they travel from city to city or from state to state if they wish to utilize any of the various IVDS operations. Such a result is surely in the public interest.

V. CONCLUSION

14. For the reasons stated above, the Licensees support the Commission's proposal to allow IVDS licensees to provide mobile service without any requirement for a mobile subscriber to also subscribe to the fixed service. Permitting mobile IVDS operations would expand access to investment capital and increase the services for which IVDS can be utilized, thereby increasing the number of

subscribers to this new service and consequently, promoting the public interest. Furthermore, mobile IVDS operations would not cause interference to television stations and, in any event, interference would have to be promptly corrected under the existing FCC Rules. The Licensees do not believe that IVDS operations, either mobile or fixed, should be limited to 100 milliwatts or to a 5-second duty cycle since such an arbitrary limitation is not necessary to protect the interests of the broadcasters. These power and operating limitations unnecessarily restrict the types of services that IVDS licensees can provide, contrary to the Commission's goal of encouraging the development of innovative communications services. Indeed, the public interest will be advanced by the addition of mobility and the elimination of the 5-second duty cycle.

Respectfully submitted,

**KMC INTERACTIVE TV, INC.
WHITEHALL WIRELESS CORP.
LOLI, INC.
VISION TV, INC.
TRANSPACIFIC INTERACTIVE, INC.
NEW WAVE COMMUNICATIONS, INC.
IVDS ON-LINE PARTNERSHIP
MAR PARTNERSHIP
DUNBAR TELEVISION CORP.**

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Dated: June 26, 1995
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SCHEDULE A

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Cleveland, OH MSA# 16A
Buffalo, NY MSA# 25B
Hamilton-Middleton, OH MSA# 145A

Whitehall Wireless Corp.

Baltimore, MD MSA# 14B
Atlantic City, NJ MSA# 134A

Loli, Inc.

Hartford, CT MSA# 32A
Rochester, NY MSA# 34B
Syracuse, NY MSA# 53A
Shreveport, LA MSA# 100B
Visalia, CA MSA# 150A
Portland, ME MSA# 152A
Portsmouth, NH MSA# 156A
El Paso, TX MSA# 81B
Janesville, WI MSA# 216A
Rockford, IL MSA# 131A
Utica-Rome, NY MSA# 115B
Elmira, NY MSA# 284A
San Angelo, TX MSA# 294A
Anchorage, AK MSA# 187B
Gulf of Mexico MSA# 306A
Bridgeport, CT MSA# 42B
Orange County, NY MSA# 144B
Manchester, NH MSA# 133B

Vision TV

Odessa, TX MSA #255B

TransPacific Interactive, Inc.

Bakersfield, CA MSA# 97A

New Wave Communications, Inc.

Lorraine-Ely., OH MSA# 136A
Reno, NV MSA# 171B
Chico, CA MSA# 215B
Redding, CA MSA# 254B
Great Falls, MT MSA# 297B

IVDS On-Line Partnership

Wheeling, WV-OH MSA# 178A
Racine, WI MSA# 189A

Premier Interactive, Inc.

Salina, CA MSA# 126B
Roanoke, VA MSA# 157B
Yakima, WA MSA# 191B

Remote Vision Interactive, Inc.

Akron, OH MSA# 52B
Duluth, MN-WI MSA# 141B
Billings, MT MSA# 268A

/j/0375/list2.

Erie, PA MSA# 130A
Poughkeepsie, NY MSA# 151A
Wilmington, NC MSA# 218A

MAR Partnership

Battle Creek, MI MSA# 177A
Clarksville, TN MSA# 209B
Kokomo, IN MSA# 271B
Pittsfield, MA MSA# 213B

Dunbar Television Corp.

York, PA MSA# 99B
Lansing, MI MSA# 78B

Community Teleplay, Inc.

Norfolk-Virginia Beach, VA MSA# 43B

TV-Active, L.L.C.

Jackson, MS MSA# 106A
Lima, OH MSA# 158B
Springfield, OH MSA# 180B
Mansfield, OH MSA# 231A

American 52 East, Inc.

Daytona Beach, FL MSA# 146A

American 52 West, Inc.

Colorado Springs, CO MSA# 117A
St. Cloud, MN MSA# 198A
Fort Collins-Loveland, CO MSA# 210A
Richland-Kennewick, WA MSA# 214B
Pueblo, CO MSA# 241A

American Interactive East, Inc.

Canton, OH MSA# 87A
Asheville, NC MSA# 183B

American Interactive West, Inc.

Honolulu, HI MSA# 50B
Tacoma, WA MSA# 82B

On-Screen USA Interactive, Inc.

Modesto, CA MSA# 142B

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RECEIVED
JUL 11 1995
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OFFICE OF SECRETARY

To: The Commission

REPLY COMMENTS

The IVDS Licensees ("Licensees")^{1/}, pursuant to Section 1.415 of the Commission's rules (the "Rules"), hereby submit these Reply Comments ("Reply") in the referenced Notice of Proposed Rulemaking (the "Rulemaking").^{2/}

I. BACKGROUND AND SUMMARY.

1. A substantial majority of the Commenters agree on most of the issues for which the Commission sought comment. Specifically, nearly all the Comments received in this Rulemaking: (i) support mobility; (ii) call for the elimination or the substantial relaxation of the 5-second duty cycle; (iii) urge the retention of the current power levels for fixed service; and (iv) urge the Commission to recognize that the current Rules concerning IVDS operations provide broad interference protection for Channel 13 broadcasters, thus eliminating the need for additional

^{1/} Attached as Schedule A is a list of the Licensees and the markets which they represent.

^{2/} The Licensees' Reply Comments are timely filed.

restrictions on the operation of IVDS facilities which would unnecessarily limit the types and quality of service that IVDS licensees could offer to the public. The Licensees urge the Commission to act promptly to make the requested changes to the Rules and thereby enhance the viability of the evolving IVDS industry.

II. THE NEAR UNIFORMITY OF THE COMMENTS REFLECTS A CLEAR RECOGNITION OF THE CHALLENGES FACING IVDS LICENSEES AS WELL AS THE PROPER MEANS FOR ADDRESSING THEM.

2. As noted above, the near uniformity of the Comments received in this Rulemaking illustrates the convergence in thinking about the structural challenges facing IVDS licensees. The majority of the Commenters also offer productive means for addressing structural challenges in a manner that supports the Commission's goals of promoting competition and development in the IVDS industry.

3. A total of nineteen (19) parties responded to the Rulemaking. Seventeen (17) of those parties supported the Commission's proposal to allow IVDS licensees to provide mobile service. See, e.g., Supporting Comments of Interactive Management Services, LLC, at 1; Comments of Tel/Logic Inc., at 3. The vast majority of the Commenters also strongly supported the elimination or substantial relaxation of the 5-second duty cycle and provided ample rationale in support of the fact that such a duty-cycle is unnecessary and redundant. See, e.g., Comments of SEA, Inc., at 6; Comments of ITV, Inc., at 3; Comments of Erwin Aguayo, Jr., at

4.

4. The majority of Commenters also made compelling cases for not changing the power levels for fixed services, recognizing that the cost of operating at lower power levels would significantly delay the roll-out of IVDS systems and would likely reduce the uses for which IVDS can be applied. See, e.g., Comments of The National Action Group for IVDS, at 9 ("IVDS Licensees have found that at these frequencies, transmissions of such low power have difficulty penetrating buildings, which greatly reduces the workability of most potential applications."); Comments of Erwin Aguayo, Jr., at 2-3 ("The Commission and the record developed in establishing the current 20 Watt authorization carefully considered and determined the potential for Channel 13 and other interference. Now is the time to expand licensee service options, not foreclose them."). See also, Comments of the Committee for Effective IVDS Regulation, at 6 ("IVDS Licensees should be free to determine appropriate power levels for RTUs in accordance with terrain capacity and investment considerations.").

5. Several Commenters also pointed out that the current Rules provide multiple redundant levels of interference protection for broadcasters and thus such a reduction in operating power is unwarranted. Dispatch Interactive Television, for example, pointed out that "other existing services in the same area of the spectrum, including amateur radio and 220-222 MHz SMR systems, have less

restrictive power limitations and regulatory safeguards to prevent interference to Channel 13 reception." Comments of Dispatch Interactive Television at 9. See also, COmments of Licensees, at 9.

III. THE OPPOSITIONS' COMMENTS MUST BE RECOGNIZED AS BIASED OR OTHERWISE MISDIRECTED.

6. The views of the minority should be viewed in light of the economic interests of each, either in defending its stake in a competing industry or in promoting its own type of equipment. Brown & Schwaninger ("B&S") is the only party which seeks to put a straight-jacket on the development of the IVDS industry. B&S offers two basic arguments. First, B&S insists that the initial IVDS Rules dramatically limited the scope and applications of IVDS businesses. The 1992 Report & Order, however, did no such thing. The Report and Order described a wide range of services IVDS licensees could provide, specifically stating that:

[The allocation of spectrum for IVDS] is warranted in order to permit development of a convenient, low-cost system that provides two-way interaction with commercial and educational programming, along with informational and data services that may be delivered by, and coordinated with, broadcast television, cable television, wireless cable, direct broadcast satellite, or any future television delivery methods.

Amendment of Parts 0, 1, 2, and 95 of the Commission's Rules to Provide Interactive Video And Data Services, 7 FCC Rcd 1630 (1992).

7. The notion that IVDS licensees should be limited in their service offerings is analogous to the FCC authorizing new radio

stations based upon the type of music it believes is needed in a certain market. Comments of the Committee for Effective IVDS Regulation, at 2. As noted by several Commenters, the substantial benefits of allowing IVDS licensees to provide the services which consumers want is the fulfillment of the Commission's goal of promoting competition in the public interest. See, e.g., Comments of the Committee for Effective IVDS Regulation, at 1; Comments of Dispatch Interactive Television, at 4. Accordingly, B&S's attempt to restrict the development of various IVDS businesses is not only inconsistent with the history of the original rulemaking, but also antithetical to the notion of competition in the marketplace.

8. The second argument raised by B&S is that the proposed changes contained in the Rulemaking would "create a dispatch or paging service" and that such a result "must be rejected to spare affected paging and dispatch operators from unwelcome surprise through the welcoming of an unwanted and unheralded entrance to the market." See B&S Comments, at 6. The public interest in expanding competition through the dynamic nature of the evolving telecommunications industry must take precedence over the concerns for protecting existing service providers from such competition. Cable television has not been protected from wireless cable; cellular has not been protected from paging or PCS and, similarly, paging and dispatch providers should not be allowed to stand in the way of the evolving IVDS industry.

9. The second contrarian view may be properly viewed as an attempt by other equipment providers to promote their equipment, as well as infrastructure flexibility. The Licensees agree that, by avoiding narrow definitions of mobility and power settings, the Commission will achieve an important goal of avoiding an anti-competitive situation where only Eon's equipment can satisfy the requirements for mobility. Broad interpretations of mobility will increase the type and variety of equipment available and likely reduce the cost of developing the IVDS systems.

10. It is important, however, to note that the Comments by Concepts to Operations, Inc. ("Concepts") not only fail to qualify the "test" results to which they refer,^{3/} but also transparently promote the equipment of Eon's main competitor as the cure for all of the potential interference concerns raised by Concepts. Indeed, even RTT - the author of the "tests" to which Concepts refers - does not espouse the points promoted by Concepts.

11. The bottom line on the "interference" issue, as noted by multiple Commenters, is that protection of the broadcasters' signal is adequately assured through Sections 95.855 and 95.859 of the Commission's Rules, which limit height and power within the grade B contour and require IVDS licensees to correct any interference problems. See 47 C.F.R. § 95.861(e). Nothing more is needed.

^{3/} These test results were both out-dated and performed at frequencies other than in the 218-219 MHz band.

IV. THE BROADCASTERS RECOGNIZE THAT THE PROPOSED RULE CHANGES WILL LEAVE THEM WELL PROTECTED.

12. No broadcasters commented on this Rulemaking. The reasons for their non-participation are understandable to anyone who has studied the Rules and recognizes that the multiple layers of Rules designed to protect Channel 13 broadcasters from interference provide more than adequate protection. Broadcasters also know that the Commission's commitment to provide television broadcasters with interference protection will not be compromised by the modest adjustments advocated herein because - should all else fail - the IVDS licensees must correct any interference. See 47 C.F.R. § 95.861(e). The IVDS licensees, knowledgeable of the broadcast industry's power, do not seek relief from this statutory obligation, but rather seek adjustments at the edges that will enable them to adjust certain technical parameters, which will contribute to the development of the information superhighway, without jeopardy to broadcast television. As noted in the Licensees' Comments, the Association for Maximum Service Television ("MSTV") has already supported the development of IVDS. Licensees' Comments, at 4.

V. OTHER MATTERS.

13. As referenced herein, the Licensees agree that the Commission should avoid creating Rules such as requiring that all mobile RTUs operate at 100 milliwatts since to do so might mandate the exclusive use of Eon's patented milliwatt technology. This

would create an anticompetitive market, contrary to the Commission's stated goals. The Licensees agree generally with the Committee for Effective IVDS Regulation that the Commission should utilize this opportunity to employ a new market-oriented regulatory approach. In this manner, the Commission would enforce its Rules concerning interference protection but would otherwise "get out of the way" of the evolving IVDS industry.

14. Several Commenters addressed the interpretation issue of "ancillary service." The Licensees reiterate their support for a broad reading of the rule - allowing subscribers to have mobility without requiring them to subscribe first to fixed service. This result is consistent with the Comments of those who advocated a broad interpretation in order to promote the corresponding benefits realized through lower cost,^{4/} more expeditious buildout^{5/} and a more flexible infrastructure.^{6/}

VI. CONCLUSION.

15. The Licensees urge that the Commission: (i) adopt mobility without limiting power levels for fixed or mobile facilities beyond the existing power ceilings; (ii) eliminate the

^{4/} See Comments of Henry Mayfield, at 2; Comments of The National Action Group for IVDS, at 13.

^{5/} See Comments of Dispatch Interactive Television, at 4.

^{6/} See Comments of ITV, Inc., at 2; Comments of Tel/Logic, Inc., at 4; and Comments of Grand Broadcasting Corp., at 4.

5-second duty cycle in recognition of the fact that substantial additional data services would be possible without this "governor" on the operation of the IVDS facilities; (iii) generally adopt a free market oriented regulatory posture toward IVDS, limited only by the non-interference requirements found in the existing Rules; and (iv) act expeditiously in recognition that the IVDS industry desperately needs relief from these unnecessary and redundant operating limitations.

WHEREFORE, these premises considered, the Licensees respectfully request that the Commission carefully consider this Reply.

Respectfully submitted,

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VISION TV, INC.
TRANS PACIFIC INTERACTIVE, INC.
NEW WAVE COMMUNICATIONS, INC.
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ON-SCREEN USA INTERACTIVE, INC.
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Their Attorney

Dated: July 11, 1995

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Shreveport, LA MSA #100B
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Janesville, WI MSA #216A
Rockford, IL MSA #131A
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Elmira, NY MSA #284A
San Angelo, TX MSA #294A
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Springfield, OH MSA #180B
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Colorado Springs, CO MSA #117A
St. Cloud, MN MSA #198A
Fort Collins-Loveland, CO MSA #210A
Richland-Kennewick, WA MSA #214B
Pueblo, CO MSA #241A

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Canton, OH MSA #87A
Asheville, NC MSA #183B

American Interactive West, Inc.

Honolulu, HI MSA #50B
Tacoma, WA MSA #82B