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**PACIFIC TELESIS**  
Group-Washington

March 25, 1997

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MAR 25 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Washington, D.C. 20554

Dear Mr. Caton:

Re: *GN Docket No. 96-228 - Amendment of the Commission's Rules to Establish Part 27, the Wireless Communications Service*

On behalf of Pacific Telesis Group, please find enclosed an original and six copies of its "Reply Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Denice Harris  
Internet: dharris@legal.pactel.com

Enclosures

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SECRETARY OF COMMERCE  
FEDERAL COMMUNICATIONS COMMISSION  
MAR 25 1997

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

In the Matter of )  
 )  
Amendment of the Commission's Rules to ) GN Docket No. 96-228  
Establish Part 27, the Wireless )  
Communications Service )  
\_\_\_\_\_ )

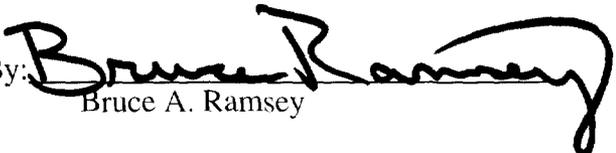
**REPLY COMMENTS OF PACIFIC TELESIS GROUP**

Pacific Telesis Group ("Pacific") submits these reply comments in response to the Commission's Report and Order establishing rules for the Wireless Communications Service ("WCS"). Pacific owns multichannel video service providers who deliver or plan to deliver video programming via MMDS.

Pacific supports the Petition for Reconsideration filed by the Wireless Cable Association, International, Inc. Operation of WCS facilities at levels above 20 watts EIRP can cause harmful blanketing interference to MMDS and ITFS licensees. For this reason, the Commission should impose a power limit of 20 watts EIRP for WCS licensees using 2.3 ghz spectrum. The Commission should allow WCS operations above the 20 watts EIRP level only if the WCS licensee obtains consent from MMDS and ITFS operators which consent may include compensation to MMDS and ITFS operators for their equipment costs to offset such interference.

Respectfully submitted,

PACIFIC TELESIS GROUP

By:   
Bruce A. Ramsey

Its Attorney

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San Ramon, CA 94583  
(510) 806-4662

March 25, 1997

The Wireless Cable Association  
International, Inc.  
Paul J. Sinderbrand  
Robert D. Primosch  
Wilkinson, Barker, Knauer & Quinn  
1735 New York Avenue, N.W.  
Washington, D.C. 20006

Auctions Division (2)  
Wireless Telecommunications Bureau  
Room 5322  
2025 M Street, N.W.  
Washington, D.C. 20554  
Attention: Josh Roland

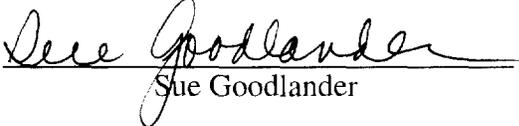
Metricom, Inc.  
Gary M. Green  
Chief Operating Officer  
980 University Avenue  
Los Gatos, CA 95030

Office of Engineering and Technology (2)  
Suite 480  
2000 M Street, N.W.  
Washington, D.C. 20554  
Attention: Tom Mooring

Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

CERTIFICATE OF SERVICE

I, Sue Goodlander, hereby certify that copies of the foregoing "REPLY COMMENTS OF PACIFIC TELESIS GROUP" regarding the Petition for Reconsideration by Wireless Cable Association, International, Inc., to be served by hand or by first-class United States mail, postage pre-paid, or by Fedex upon the parties appearing on the attached service list this twenty-fifth day of March 1997.

By:   
Sue Goodlander