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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

In the Matter of )  
)  
**Amendment of the Commission's** )  
**Rules Regarding Multiple** )  
**Address Systems** )

WT Docket No. 97-81

To: The Commission

**JOINT COMMENTS ON THE  
NOTICE OF PROPOSED RULEMAKING**

AirTouch Paging ("AirTouch") and Arch Communications Group ("Arch"), on their own behalf and on behalf of their various operating subsidiaries, by their attorney, hereby jointly comment on the Notice of Proposed Rulemaking (WT Docket No. 97-81), FCC 97-58, released February 27, 1997 (the "NPRM"), in which the Commission proposes to modify the manner in which spectrum allocated for Multiple Address Systems ("MAS") is licensed. The following is respectfully shown:

**I. AirTouch and Arch Are Interested Parties**

1. AirTouch and Arch (collectively, the "Joint Commenters") are two of the four largest providers of paging services in the United States. The companies' systems provide diverse local, regional, and nationwide messaging services. In operating their networks, the companies make extensive use of various radio channels to control paging base station transmitters.

2. Between January 7 and February 5, 1992, the companies each filed a substantial number of applications for 932/941 MHz multiple access control

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channels for use as intermediary links in their paging networks.<sup>1/</sup> The applications have been accepted for filing and have been pending unprocessed by the Commission for over 5 years. During this period of time, the needs of the companies for radio control facilities have not abated. Consequently, the Joint Commenters are interested in having these applications processed and granted so that the requested spectrum can be put to the proposed use.

3. In the NPRM, the Commission tentatively concludes that the 932/941 MHz MAS bands should be designated for subscriber-based services and licensed on a geographic area basis using competitive bidding procedures. The Commission also proposes to dismiss all pending applications for 932/941 MHz spectrum, including the applications of the Joint Commenters.

4. As applicants of long standing for MAS spectrum, the Joint Commenters have a legitimate and cognizable interest in this proceeding. The proposed dismissal of their applications will have an immediate adverse effect on AirTouch and Arch, thus according them status as interested parties in this docket.

## **II. The Pending Applications of the Joint Commenters Do Not Propose Subscriber-Based Services**

5. The tentative decision of the Commission to use competitive bidding to license 932/941 MHz MAS is based upon the conclusion that the principal use of this spectrum would involve, or is reasonably likely to involve, subscriber-based

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<sup>1/</sup> Attachment 1 hereto is a copy of the Commission's Public Notice, Mimeo No. 30626 released November 19, 1992 listing multiple applications of Arch's affiliates (Arch Capitol District, Arch Connecticut Valley and Arch Southeast) and AirTouch's predecessors in interest (PacTel Paging of Texas, PacTel Paging of Virginia, PacTel Paging of California and PacTel Paging).

service.<sup>2/</sup> With regard to AirTouch and Arch, this conclusion is clearly incorrect.

The parties' applications make clear that they propose to use the requested frequencies to control paging facilities at multiple locations. This is not, therefore, a commercial subscriber usage, but rather is an intermediate link usage akin to an internal system of communication. Under these circumstances, the applications of AirTouch and Arch should not be subjected to competitive bidding procedures.

6. The Joint Commenters believe this issue should be deemed conclusively resolved by the outcome following the Commission's 1993 Notice of Proposed Rulemaking in the competitive bidding docket in which the licensing methodology for MAS licenses was specifically considered.<sup>3/</sup> At that time, the Commission stated that "we [could not] be certain that the principal use of [the MAS] frequencies [was] reasonably likely to involve the provision of service to subscribers", and concluded that licenses to provide MAS should not be awarded through competitive bidding. The Commission purports to have revised this conclusion based upon its review of the over 50,000 applications for MAS licenses filed during the 5 two-day filing windows opened during January and February 1992. However, information contained in these applications is not "new information" since it was a matter of public record before the earlier conclusion that competitive bidding would not be used. Moreover, while the Joint Commenters cannot profess to have reviewed all 50,000 of the pending applications, they recognize the names of many of the

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<sup>2/</sup> NPRM at ¶ 49.

<sup>3/</sup> Notice of Proposed Rulemaking (PP Docket No. 93-253), 8 FCC Rcd 7635, 7659-60 (1993).

applicants who sought MAS spectrum during the filing windows in early 1992 and whose applications showed up on the November 19, 1992 Public Notice. Most of those applicants are, like the Joint Commenters, paging companies who presumably are proposing to use the MAS spectrum for radio control purposes. See Attachment 1.

7. Based on the foregoing, the Commission conclusion that the principal use of spectrum in the 932/941 MHz bands is to provide subscriber-based services is without substantial support in any record developed since the conclusion of the 1993 rulemaking proceeding, and should therefore be abandoned.

### **III. Intermediate Links Should Not Be Subject to Auction**

8. For a variety of policy reasons, the Commission should not require telecommunications carriers to buy intermediate radio control links at auctions. First, the Commission already fully considered this issue in its original competitive bidding proceeding. In its Second Report and Order in PP Docket No. 93-253 regarding the implementation of Section 309(j) of the Communications Act governing competitive bidding, the Commission specifically considered whether "intermediate links," which defines a broad category of services that included transmitter control operations, satisfy the requirements for auction eligibility set forth in Section 309(j)(2) of the Act.<sup>4/</sup> Although the Commission initially proposed subjecting such links to auction, commenting parties strenuously opposed this proposal, in part because such links do not transmit signals directly to subscribers. Ultimately, the Commission decided not

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<sup>4/</sup> 9 FCC Rcd 2348, 2355 (1994).

to auction off intermediate links. The current NPRM provides an inadequate basis on which to revisit or abandon this earlier, well-considered determination.

9. The proposal to auction MAS frequencies also creates competitive disparities. At present, auction procedures do not apply to the licensing of 72-76 MHz control channels, certain point-to-point microwave channels licensed under Part 22 of the rules, nor, under the Commission's latest proposal, to 928/952/956 MAS. As a result, subjecting 932/941 to auction will create inconsistent regulatory treatment. The Commission would be adopting licensing procedures which will skew the normal marketplace forces that should govern the selection of otherwise fungible spectrum.

10. Charging for intermediate links also is an objectionable form of "double dipping." Wireless carriers, including paging carriers, already are paying substantial sums of money to the Commission in auction proceedings for base transmit frequencies. AirTouch and Arch both participated in the auction of narrowband PCS spectrum and have made substantial payments to the government for channels they won. The companies also will be actively participating in the forthcoming market area auctions for traditional paging channels and will, again, be acquiring spectrum for the explicit provision of subscriber-based services. It strikes the Joint Commenters as inappropriate for the Commission to force them to pay for intermediate links in addition to having to acquire spectrum for underlying base transmit facilities.

#### **IV. Fairness Requires that the Previously Adopted Lottery Procedure be Completed**

11. The Commission's auction authority derives from the Omnibus Budget Reconciliation Act of 1993.<sup>5/</sup> The Budget Act contains the presumption that applications pending on or before July 26, 1993 would continue to be processed using preexisting lottery procedures.<sup>6/</sup> In multiple other contexts, including unserved area applications and MDS applications, the Commission has found that the public interest is best served by the continued use of lotteries to process pending applications that are governed by the special rule applicable to applications filed prior to July 26, 1993.<sup>7/</sup> One principal consideration in these earlier determinations was the public interest benefit in not changing licensing processes in mid-stream. This rationale applies with great force here because of the length of time that the MAS applications have been pending.

12. The suggestion in the NPRM that conversion to auction procedures will be more expeditious is completely unconvincing. The Joint Commenters understand that the Commission already has completed substantial pre-processing of the pending MAS applications, and could in fact release a lottery list with relative ease. The task of completing such a lottery must be considered less daunting than resolving the auction issues under consideration in the NPRM and conducting auctions.

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<sup>5/</sup> Pub.L.No. 103-66, 107 Stat. 312 (1993).

<sup>6/</sup> 47 U.S.C. §§ 309(i) and (j).

<sup>7/</sup> See NPRM, ¶ 53.

13. It is particularly inappropriate for the Commission to use expedition as a basis to alter the licensing process when it has allowed MAS applications to remain pending without action for more than 5 years. If, indeed, the speed of processing was a consideration, the Commission should have devoted greater resources to processing these applications long ago.

14. A substantial equity issue also arises because of the fact that MAS applicants paid substantial application preparation and filing fees in connection with their applications. To suggest that these applications are being dismissed "without prejudice"<sup>8/</sup> is utterly false. The applicants have not only been prejudiced by the delay to date, and the further delay that would attend completion of an auction proceeding, but also are prejudiced by the fact that they prepared and filed applications in good faith under duly promulgated rules, paid all associated fees, only to have the government determine that it would not process those applications despite its public charge to do so.

**V. The Public Interest is not Served by  
the Commission's Proposal**

15. MAS frequencies originally were made available for paging control purposes based upon a substantial public interest showing that there was a critical shortage of spectrum for these important radio links. The NPRM contains no information indicating that this need has abated. Nevertheless, the Commission has concluded that the 932/941 and 928/959 MHz MAS bands should be designated for

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<sup>8/</sup> NPRM, ¶ 52.

subscriber-based services and licensed on a geographic area basis. This proposal will drive out the beneficial use of these frequencies as non-revenue producing repeater and control links.

16. The licensing scheme the Commission is proposing would render the MAS spectrum virtually indistinguishable from other narrowband paging and PCS spectrum which is presently available. There is, however, no record evidence indicating that more such spectrum is required. Indeed, there is reason to suspect that the recapturing of UHF and VHF two-way mobile telephone channels, the licensing of 929 MHz paging channels on an exclusive basis, the release of substantial narrowband PCS spectrum, the move toward geographic licensing for all additional paging channels, and the recently proposed release of an additional 1 MHz of narrowband PCS spectrum,<sup>2/</sup> have or will create a glut of narrowband spectrum. While the Commission may not be interested in trying to determine in advance the precise needs to which spectrum will be put, at the very least thoughtful consideration should be given to whether changed circumstances justify altering the essential character of spectrum from previously proposed uses found to be in the public interest. This essential analysis has not been performed.

#### CONCLUSION

The foregoing premises having been duly considered, AirTouch and Arch respectfully submit that the radical changes reflected in the NPRM for MAS be abandoned. Pending applications, such as those of AirTouch and Arch, should be

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<sup>2/</sup> See Report and Order and Further Notice and Proposed Rulemaking (GEN Docket No. 90-314), FCC 97-140, released April 23, 1997 at ¶ 33.

processed under pre-existing rules and granted as soon as possible. Any further consideration of a market area licensing scheme for MAS spectrum should be postponed until this licensing process is completed. At that point, thoughtful consideration can be given to the future use of MAS spectrum and whether there is any the benefit in allocating it to narrowband uses that appear to be largely indistinguishable from uses of fungible spectrum in nearby bands.

Respectfully submitted,

**AirTouch Paging  
Arch Communications Group**

By:



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May 1, 1997

**CERTIFICATE OF SERVICE**

I, Yvette Omar, a legal secretary with the law firm of Paul, Hastings, Janofsky & Walker LLP, do hereby certify that on this 1st day of May, 1997, I caused copies of the foregoing **Joint Comments on the Notice of Proposed Rulemaking** to be served by hand delivery on the following:

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1ST OPINION of Level 1 printed in FULL format.

COMMON CARRIER PUBLIC MOBILE SERVICES INFORMATION  
932/941 MHz Multiple Access Control Channel Applications  
Accepted For Filing

[NO NUMBER IN ORIGINAL]

FEDERAL COMMUNICATIONS COMMISSION

1992 FCC LEXIS 6481

November 19, 1992

ACTION: [\*1] PUBLIC NOTICE (30626)

OPINION:

The applications listed below, filed between January 7 and February 5, 1992, for 932/941 MHz multiple access control channels have been ACCEPTED FOR FILING:

AAT RADIOTELEPHONE COMPANY STATEN ISLAND, NY	Fee Number: CD9201138924011014
AAT RADIOTELEPHONE COMPANY STATEN ISLAND, NY	Fee Number: CD9201138924011015
AAT RADIOTELEPHONE COMPANY STATEN ISLAND, NY	Fee Number: CD9201138924011018
AGR BEEPERS INC WEST PALM BEACH, FL	Fee Number: CD9201168924013001
AMERICAN BEEPER COMPANY INC CHICAGO, IL	Fee Number: CD9201238924019001
AMERICAN PAGING INC OF ARIZONA PHOENIX, AZ	Fee Number: CD9202108924045003
AMERICAN PAGING INC OF KENTUCKY SHELBYVILLE, KY	Fee Number: CD9201238924019003
AMERICAN PAGING INC OF VIRGINIA PRINCE FREDERICK, MD	Fee Number: CD9201108924005022
AMERICAN PAGING INC OF VIRGINIA FREDERICK, MD	Fee Number: CD9201108924005024
AMERICAN PAGING INC OF VIRGINIA SILVER SPRING, MD	Fee Number: CD9201108924005025
ARCH CAPITOL DISTRICT INC FAIRPORT, NY	Fee Number: CD9201138924007001
ARCH CAPITOL DISTRICT INC LAFAYETTE, NY	Fee Number: CD9201138924007002
ARCH CAPITOL DISTRICT INC PATTERSONVILLE, NY	Fee Number: CD9201138924007007
ARCH CAPITOL DISTRICT INC PATTERSONVILLE, NY	Fee Number: CD9201138924007011
ARCH CAPITOL DISTRICT INC DEERFIELD TWP, NY	Fee Number: CD9201138924007012
ARCH CAPITOL DISTRICT INC NEW SALEM, NY	Fee Number: CD9201138924007013
ARCH CAPITOL DISTRICT INC PATTERSONVILLE, NY	Fee Number: CD9201138924007014



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ARCH CAPITOL DISTRICT INC NEW SALEM, NY	Fee Number: CD9201138924007015
ARCH CAPITOL DISTRICT INC NEW YORK, NY	Fee Number: CD9201138924007016
ARCH CAPITOL DISTRICT INC BUFFALO, NY	Fee Number: CD9201138924007017
ARCH CAPITOL DISTRICT INC HIGHLAND, NY	Fee Number: CD9201138924007018
ARCH CAPITOL DISTRICT INC PATTERSONVILLE, NY	Fee Number: CD9201138924007019
ARCH CAPITOL DISTRICT INC BEACON, NY	Fee Number: CD9201138924007020
ARCH CAPITOL DISTRICT INC NEW YORK, NY	Fee Number: CD9201138924007024
ARCH CONNECTICUT VALLEY INC STAMFORD, CT	Fee Number: CD9201138924007008
ARCH CONNECTICUT VALLEY INC GOFFSTOWN, NH	Fee Number: CD9201138924007009
ARCH CONNECTICUT VALLEY INC TAUNTON, MA	Fee Number: CD9201138924007021
ARCH CONNECTICUT VALLEY INC WINDSOR, VT	Fee Number: CD9201138924007022
ARCH CONNECTICUT VALLEY INC BOSTON, MA	Fee Number: CD9201138924007023
ARCH CONNECTICUT VALLEY INC HOLYOKE, MA	Fee Number: CD9201138924007025
ARCH SOUTHEAST COMMUNICATIONS INC GAINESVILLE, FL	Fee Number: CD9201168924013007
BUSSMAN, KEITH B GOLDEN, CO	Fee Number: CD9201308924021013
BUSSMAN, KEITH B CHEYENNE, WY	Fee Number: CD9201308924021014
CARRIER COMMUNICATIONS CORP NEW YORK, NY	Fee Number: CD9201108924005013
CARRIER COMMUNICATIONS CORP BOSTON, MA	Fee Number: CD9201108924005014
CARRIER COMMUNICATIONS CORP SELDEN, NY	Fee Number: CD9201108924005015
CARRIER COMMUNICATIONS CORP MAHOPAC, NY	Fee Number: CD9201108924005039
CARRIER COMMUNICATIONS CORP PHILADELPHIA, PA	Fee Number: CD9201108924005040
CELLULAR ELECTRONICS INC MIAMI, FL	Fee Number: CD9201178924015025
COMMUNICATION TRANSMITTING SERVICE SANTA PAULA, CA	Fee Number: CD9202078924037022
COMMUNICATION TRANSMITTING SERVICE PASADENA, CA	Fee Number: CD9202078924037023
COMMUNICATION TRANSMITTING SERVICE LAGUNA HILLS, CA	Fee Number: CD9202078924037024
CONTACT COMMUNICATIONS INC SYOSSET, NY	Fee Number: CD9201108924005016
CONTACT COMMUNICATIONS INC PAXTON, MA	Fee Number: CD9201108924005017



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CONTACT COMMUNICATIONS INC MANORVILLE, NY	Fee Number: CD9201108924005019
CONTACT COMMUNICATIONS INC TRENTON, NJ	Fee Number: CD9201108924005020
CONTACT COMMUNICATIONS INC BALTIMORE, MD	Fee Number: CD9201108924005021
CONTACT COMMUNICATIONS INC HIGHLAND, NY	Fee Number: CD9201108924005023
CONTACT COMMUNICATIONS INC NEW YORK, NY	Fee Number: CD9201108924005027
CONTACT COMMUNICATIONS INC NEW YORK, NY	Fee Number: CD9201108924005028
CONTACT COMMUNICATIONS INC HIGHLAND, NY	Fee Number: CD9201108924005038
COOK TELECOM INC OF SAN DIEGO STEELE, CA	Fee Number: CD9202108924042023
COOK TELECOM INC OF SAN DIEGO SAN MARCOS, CA	Fee Number: CD9202108924042024
CRICO COMMUNICATIONS CORPORATION FORT LAUDERDALE, FL	Fee Number: CD9201178924015004
CRICO COMMUNICATIONS CORPORATION FORT LAUDERDALE, FL	Fee Number: CD9201178924015005
CRICO COMMUNICATIONS CORPORATION FORT LAUDERDALE, FL	Fee Number: CD9201178924015006
CRICO COMMUNICATIONS CORPORATION FORT LAUDERDALE, FL	Fee Number: CD9201178924015007
CRICO COMMUNICATIONS CORPORATION FORT LAUDERDALE, FL	Fee Number: CD9201178924015008
CRICO COMMUNICATIONS CORPORATION WEST PALM BEACH, FL	Fee Number: CD9201178924015009
CRICO COMMUNICATIONS CORPORATION WEST PALM BEACH, FL	Fee Number: CD9201178924015010
CRICO COMMUNICATIONS CORPORATION FORT LAUDERDALE, FL	Fee Number: CD9201178924015011
CRICO COMMUNICATIONS CORPORATION MIAMI, FL	Fee Number: CD9201178924015012
CRICO COMMUNICATIONS CORPORATION STUART, FL	Fee Number: CD9201178924015013
ELECTRONIC SYSTEMS CO INC HANOVER TOWNSHIP, PA	Fee Number: CD9201138924011019
EXPRESS MESSAGE CORPORATION HOUSTON, TX	Fee Number: CD9201308924021015
FORSYTHE & ASSOCIATES INC IDAHO SPRINGS, CO	Fee Number: CD9201308924021008
GTE FLORIDA LAKELAND, FL	Fee Number: CD9201178924015001
GTE FLORIDA SARASOTA, FL	Fee Number: CD9201178924015002
GTE FLORIDA LAKELAND, FL	Fee Number: CD9201178924015003
GTE FLORIDA TAMPA, FL	Fee Number: CD9201178924015022



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HARRIS, HAROLD VISALIA, CA	Fee Number: CD9202108924047001
INDIANA PAGING NETWORK INC CHICAGO, IL	Fee Number: CD9201238924019002
INTERELECTRONICS CORPORATION CONGERS, NY	Fee Number: CD9201098924002002
INTERELECTRONICS CORPORATION NEW YORK, NY	Fee Number: CD9201098924002003
KELLEY, PAUL Mountain Top, PA	Fee Number: CD9201098924001036
KJ PAGING INC ALEXANDRIA, VA	Fee Number: CD9201098924001035
KJ PAGING INC TOWSON, MD	Fee Number: CD9201098924001037
KWIK PAGE COMMUNICATIONS INC CHATSWORTH, CA	Fee Number: CD9202108924068002
LITELCO COMMUNICATIONS INC NEW HAVEN, CT	Fee Number: CD9201138924008008
LITELCO COMMUNICATIONS INC NEW HAVEN, CT	Fee Number: CD9201138924011017
METROCALL OF DELAWARE SANTA YNEZ, CA	Fee Number: CD9202108924044005
METROCALL OF DELAWARE INC ALEXANDRIA, VA	Fee Number: CD9201098924001043
METROCALL OF DELAWARE INC ALEXANDRIA, VA	Fee Number: CD9201098924001044
METROCALL OF DELAWARE INC ALEXANDRIA, VA	Fee Number: CD9201098924001045
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METROCALL OF DELAWARE INC PHILADELPHIA, PA	Fee Number: CD9201108924005036
METROCALL OF DELAWARE INC RENO, NV	Fee Number: CD9202108924044001
METROCALL OF DELAWARE INC FOSTER CITY, CA	Fee Number: CD9202108924044002
METROCALL OF DELAWARE INC DANVILLE, CA	Fee Number: CD9202108924044003
METROCALL OF DELAWARE INC DANVILLE, CA	Fee Number: CD9202108924044004
METROCALL OF DELAWARE INC GRASS VALLEY, CA	Fee Number: CD9202108924044006
METROCALL OF DELAWARE INC GRASS VALLEY, CA	Fee Number: CD9202108924044007
METROCALL OF DELAWARE INC GRASS VALLEY, CA	Fee Number: CD9202108924044008
METROCALL OF DELAWARE INC LOS ANGELES, CA	Fee Number: CD9202108924044009
METROCALL OF DELAWARE INC LOS ANGELES, CA	Fee Number: CD9202108924044010



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METROCALL OF DELAWARE INC ANAHEIM, CA	Fee Number: CD9202108924044012
METROCALL OF DELAWARE INC LOS GATOS, CA	Fee Number: CD9202108924044016
METROCALL OF DELAWARE INC LOS GATOS, CA	Fee Number: CD9202108924044017
METROCALL OF DELAWARE INC FOSTER CITY, CA	Fee Number: CD9202108924044019
METROCALL OF DELAWARE INC RENO, NV	Fee Number: CD9202108924044020
METROCALL OF DELAWARE INC RENO, NV	Fee Number: CD9202108924044021
METROCALL OF DELAWARE INC SAN DIEGO, CA	Fee Number: CD9202108924044022
METROCALL OF DELAWARE INC MAJESKA, CA	Fee Number: CD9202108924044023
METROCALL OF DELAWARE INC LOS ANGELES, CA	Fee Number: CD9202108924044024
METROCALL OF DELAWARE INC SANTA YNEZ, CA	Fee Number: CD9202108924044025
METROCALL OF DELAWARE INC DANVILLE, CA	Fee Number: CD9202108924045001
METROCALL OF DELAWARE INC LOS GATOS, CA	Fee Number: CD9202108924045002
METROCALL OF DELAWARE INC SAN DIEGO, CA	Fee Number: CD9202108924045004
METROCALL OF DELAWARE INC MAJESKA, CA	Fee Number: CD9202108924045005
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METROCALL OF DELAWARE INC FOSTER CITY, CA	Fee Number: CD9202108924045007
METROCALL OF DELAWARE INC SANTA YNEZ, CA	Fee Number: CD9202108924045008
METROCALL OF DELAWARE INC SAN DIEGO, CA	Fee Number: CD9202108924045009
METROCALL OF DELAWARE INC ANAHEIM, CA	Fee Number: CD9202108924045010
METROMEDIA PAGING SERVICES INC MANORVILLE, NY	Fee Number: CD9201098924001001
METROMEDIA PAGING SERVICES INC NEW YORK, NY	Fee Number: CD9201098924001002
METROMEDIA PAGING SERVICES INC FISHKILL, NY	Fee Number: CD9201098924001005
METROMEDIA PAGING SERVICES INC BARNEGAT, NJ	Fee Number: CD9201098924001038
METROMEDIA PAGING SERVICES INC TRENTON, NJ	Fee Number: CD9201098924001039
METROMEDIA PAGING SERVICES INC BARNEGAT, NJ	Fee Number: CD9201098924001040
METROMEDIA PAGING SERVICES INC TRENTON, NJ	Fee Number: CD9201098924001046



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1992 FCC LEXIS 6481, \*1

METROMEDIA PAGING SERVICES INC NEW SALEM, NY	Fee Number: CD9201098924001047
METROMEDIA PAGING SERVICES INC FORT LEE, NJ	Fee Number: CD9201098924001048
METROMEDIA PAGING SERVICES INC FORT LEE, NJ	Fee Number: CD9201098924001049
METROMEDIA PAGING SERVICES INC NEW YORK, NY	Fee Number: CD9201098924002005
METROMEDIA PAGING SERVICES INC NEW YORK, NY	Fee Number: CD9201098924002006
METROMEDIA PAGING SERVICES INC NEW YORK, NY	Fee Number: CD9201098924002007
METROMEDIA PAGING SERVICES INC GREENBROOK, NJ	Fee Number: CD9201098924002008
METROMEDIA PAGING SERVICES INC GREENBROOK, NJ	Fee Number: CD9201098924002009
METROMEDIA PAGING SERVICES INC GREENBROOK, NJ	Fee Number: CD9201098924002010
METROMEDIA PAGING SERVICES INC GREENBROOK, NJ	Fee Number: CD9201098924002011
METROMEDIA PAGING SERVICES INC BRIDGEPORT, CT	Fee Number: CD9201098924002012
METROMEDIA PAGING SERVICES INC BRIDGEPORT, CT	Fee Number: CD9201098924002013
METROMEDIA PAGING SERVICES INC NEW YORK, NY	Fee Number: CD9201098924002014
METROMEDIA PAGING SERVICES INC FISHKILL, NY	Fee Number: CD9201098924002015
METROMEDIA PAGING SERVICES INC BRIDGEPORT, CT	Fee Number: CD9201098924002016
METROMEDIA PAGING SERVICES INC MANORVILLE, NY	Fee Number: CD9201098924002017
METROMEDIA PAGING SERVICES INC DOROTHY, NJ	Fee Number: CD9201098924003001
METROMEDIA PAGING SERVICES INC LEESBURG, VA	Fee Number: CD9201098924003002
METROMEDIA PAGING SERVICES INC PINE HILL, NJ	Fee Number: CD9201098924003003
METROMEDIA PAGING SERVICES INC CAMDEN, DE	Fee Number: CD9201098924003004
METROMEDIA PAGING SERVICES INC SALISBURY, MD	Fee Number: CD9201098924003005
METROMEDIA PAGING SERVICES INC FREDERICK, MD	Fee Number: CD9201098924003006
METROMEDIA PAGING SERVICES INC COLUMBIA, MD	Fee Number: CD9201098924003007
METROMEDIA PAGING SERVICES INC COLUMBIA, MD	Fee Number: CD9201098924003008
METROMEDIA PAGING SERVICES INC COLUMBIA, MD	Fee Number: CD9201098924003009
METROMEDIA PAGING SERVICES INC BETHESDA, MD	Fee Number: CD9201098924003010
METROMEDIA PAGING SERVICES INC CREVE COEUR, MO	Fee Number: CD9201238924019005



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METROMEDIA PAGING SERVICES INC HOUSTON, TX	Fee Number: CD9201308924021002
METROMEDIA PAGING SERVICES INC AUSTIN, TX	Fee Number: CD9201308924021003
METROMEDIA PAGING SERVICES INC HOUSTON, TX	Fee Number: CD9201308924021004
METROMEDIA PAGING SERVICES INC ALLEN, TX	Fee Number: CD9201308924021005
METROMEDIA PAGING SERVICES INC AUSTIN, TX	Fee Number: CD9201308924021006
METROMEDIA PAGING SERVICES INC AUSTIN, TX	Fee Number: CD9201308924021007
METROMEDIA PAGING SERVICES INC SACRAMENTO, CA	Fee Number: CD9202108924042018
MID ATLANTIC PAGING COMPANY INC ALEXANDRIA, VA	Fee Number: CD9201098924001024
MID ATLANTIC PAGING COMPANY INC NEW YORK, NY	Fee Number: CD9201098924001026
MID ATLANTIC PAGING COMPANY INC LEWES, DE	Fee Number: CD9201098924001027
MID ATLANTIC PAGING COMPANY INC NORFOLK, VA	Fee Number: CD9201098924001028
MID ATLANTIC PAGING COMPANY INC BOSTON, MA	Fee Number: CD9201098924001029
MID ATLANTIC PAGING COMPANY INC RICHMOND, VA	Fee Number: CD9201098924001030
MID ATLANTIC PAGING COMPANY INC CENTRAL ISLIP, NY	Fee Number: CD9201098924001031
MID ATLANTIC PAGING COMPANY INC ELWOOD, NJ	Fee Number: CD9201098924001032
MID ATLANTIC PAGING COMPANY INC ARBUTUS, MD	Fee Number: CD9201098924001033
MID ATLANTIC PAGING COMPANY INC PHILADELPHIA, PA	Fee Number: CD9201098924001034
NETWORK PAGE INC SALISBURY, MD	Fee Number: CD9201108924005029
NETWORK PAGE INC BALTIMORE, MD	Fee Number: CD9201108924005030
NETWORK PAGE INC ALEXANDRIA, VA	Fee Number: CD9201108924005037
PAC TEL PAGING OF TEXAS ARLINGTON, TX	Fee Number: CD9201308924022001
PAC TEL PAGING OF TEXAS ARLINGTON, TX	Fee Number: CD9201308924022002
PAC TEL PAGING OF TEXAS ARLINGTON, TX	Fee Number: CD9201308924022003
PAC TEL PAGING OF TEXAS HEDWIG VILLAGE, TX	Fee Number: CD9201308924022004
PAC TEL PAGING OF TEXAS HEDWIG VILLAGE, TX	Fee Number: CD9201308924022005
PAC TEL PAGING OF TEXAS HEDWIG VILLAGE, TX	Fee Number: CD9201308924022006



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PAC TEL PAGING OF TEXAS ARLINGTON, TX	Fee Number: CD9201308924022009
PAC TEL PAGING OF TEXAS ARLINGTON, TX	Fee Number: CD9201308924022010
PAC TEL PAGING OF VIRGINIA INC BALTIMORE, MD	Fee Number: CD9201108924006001
PAC WEST TELECOMM INC MARIPOSA, CA	Fee Number: CD9202108924042001
PAC WEST TELECOMM INC PASADENA, CA	Fee Number: CD9202108924042010
PAC WEST TELECOMM INC STOCKTON, CA	Fee Number: CD9202108924042011
PAC WEST TELECOMM INC WESTLEY, CA	Fee Number: CD9202108924042016
PAC WEST TELECOMM INC VACAVILLE, CA	Fee Number: CD9202108924042017
PACIFIC BELL SACRAMENTO, CA	Fee Number: CD9202078924037025
PACIFIC BELL SAN DIEGO, CA	Fee Number: CD9202108924042002
PACIFIC BELL OAKLAND, CA	Fee Number: CD9202108924042003
PACIFIC BELL STOCKTON, CA	Fee Number: CD9202108924042004
PACIFIC BELL SAN DIEGO, CA	Fee Number: CD9202108924042006
PACIFIC BELL LOS ANGELES, CA	Fee Number: CD9202108924042019
PACIFIC BELL LOS ANGELES, CA	Fee Number: CD9202108924042020
PACIFIC BELL FRESNO, CA	Fee Number: CD9202108924042021
PACIFIC BELL LOS ANGELES, CA	Fee Number: CD9202108924042022
PACTEL PAGING ATLANTA, GA	Fee Number: CD9201168924014001
PACTEL PAGING ATLANTA, GA	Fee Number: CD9201168924014002
PACTEL PAGING ATLANTA, GA	Fee Number: CD9201168924014003
PACTEL PAGING ATLANTA, GA	Fee Number: CD9201168924014004
PACTEL PAGING ST. PETERSBURG, FL	Fee Number: CD9201168924014005
PACTEL PAGING ST. PETERSBURG, FL	Fee Number: CD9201168924014006
PACTEL PAGING ATLANTA, GA	Fee Number: CD9201168924014007
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PACTEL PAGING CINCINNATI, OH	Fee Number: CD9201238924019011
PACTEL PAGING OVERLAND, MO	Fee Number: CD9201238924019012
PACTEL PAGING FARMINGTON HILLS, MI	Fee Number: CD9201238924019013
PACTEL PAGING OVERLAND, MO	Fee Number: CD9201238924019014
PACTEL PAGING OF CALIFORNIA SAN DIEGO, CA	Fee Number: CD9202078924037001
PACTEL PAGING OF CALIFORNIA HAYWARD, CA	Fee Number: CD9202078924037002
PACTEL PAGING OF CALIFORNIA HAYWARD, CA	Fee Number: CD9202078924037015
PACTEL PAGING OF CALIFORNIA HAYWARD, CA	Fee Number: CD9202078924037016
PACTEL PAGING OF CALIFORNIA HAYWARD, CA	Fee Number: CD9202078924037017
PACTEL PAGING OF CALIFORNIA HAYWARD, CA	Fee Number: CD9202078924037018
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PACTEL PAGING OF CALIFORNIA ANAHEIM, CA	Fee Number: CD9202078924037020
PACTEL PAGING OF CALIFORNIA FRESNO, CA	Fee Number: CD9202078924037021
PACTEL PAGING OF CALIFORNIA HAYWARD, CA	Fee Number: CD9202108924042009
PACTEL PAGING OF CALIFORNIA ANAHEIM, CA	Fee Number: CD9202108924042012
PACTEL PAGING OF CALIFORNIA ANAHEIM, CA	Fee Number: CD9202108924042013
PACTEL PAGING OF CALIFORNIA SAN DIEGO, CA	Fee Number: CD9202108924042014
PACTEL PAGING OF CALIFORNIA SANTA BARBARA, CA	Fee Number: CD9202108924042015
PACTEL PAGING OF CALIFORNIA ANAHEIM, CA	Fee Number: CD9202108924068003
PACTEL PAGING OF CALIFORNIA ANAHEIM, CA	Fee Number: CD9202108924068004
PACTEL PAGING OF CALIFORNIA MODESTO, CA	Fee Number: CD9202108924068005
PACTEL PAGING OF CALIFORNIA ANAHEIM, CA	Fee Number: CD9202108924068006
PAGEAMERICA OF NEW YORK INC RIDGE, NY	Fee Number: CD9201138924010001
PAGEAMERICA OF NEW YORK INC TRUMBULL, CT	Fee Number: CD9201138924010002
PAGEAMERICA OF NEW YORK INC TRUMBULL, CT	Fee Number: CD9201138924010003
PAGEAMERICA OF NEW YORK INC SUNNYSIDE, NY	Fee Number: CD9201138924010004



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PAGEAMERICA OF NEW YORK INC MANAHAWKIN, NJ	Fee Number: CD9201138924010006
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PAGEAMERICA OF NEW YORK INC DANBURY, CT	Fee Number: CD9201138924010020
PAGEAMERICA OF NEW YORK INC MANORVILLE, NY	Fee Number: CD9201138924011020
PAGEAMERICA OF NEW YORK INC CHESTERFIELD, CT	Fee Number: CD9201138924011021
PAGEAMERICA OF NEW YORK INC NEW YORK, NY	Fee Number: CD9201138924011022
PAGEAMERICA OF NEW YORK INC HACKENSACK, NJ	Fee Number: CD9201308924021011
PAGEAMERICA OF NEW YORK INC HACKENSACK, NJ	Fee Number: CD9201308924021012
PAGEX COMPANY CONGERS, NY	Fee Number: CD9201098924002001
PAGEX COMPANY CONGERS, NY	Fee Number: CD9201098924002004
PAGIN NETWORK OF NEW YORK, INC BLOOMING GROVE, NY	Fee Number: CD920113892401216
PAGING ASSOCIATES INC GLASTONBURY, CT	Fee Number: CD9201138924011016
PAGING NETWORK INC SEATTLE, WA	Fee Number: CD9202108924067018
PAGING NETWORK OF FLORIDA INC FORT MEYERS, FL	Fee Number: CD9201178924015014
PAGING NETWORK OF FLORIDA INC HOMESTEAD, FL	Fee Number: CD9201178924015015
PAGING NETWORK OF FLORIDA INC MIRAMAR, FL	Fee Number: CD9201178924015016
PAGING NETWORK OF FLORIDA INC FORT PIERCE, FL	Fee Number: CD9201178924015017
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PAGING NETWORK OF FLORIDA INC PALM CITY, FL	Fee Number: CD9201178924015020
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PAGING NETWORK OF FLORIDA INC FORT PIERCE, FL	Fee Number: CD9201178924015023
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PAGING NETWORK OF FLORIDA INC LAKELAND, FL	Fee Number: CD9201178924015028
PAGING NETWORK OF FLORIDA INC BOYNTON BEACH, FL	Fee Number: CD9201178924015029



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PAGING NETWORK OF HOUSTON INC FORT WORTH, TX	Fee Number: CD9201308924023002
PAGING NETWORK OF HOUSTON INC CONROE, TX	Fee Number: CD9201308924023003
PAGING NETWORK OF HOUSTON INC HOUSTON, TX	Fee Number: CD9201308924023004
PAGING NETWORK OF HOUSTON INC BEAUMONT, TX	Fee Number: CD9201308924023005
PAGING NETWORK OF HOUSTON INC HOUSTON, TX	Fee Number: CD9201308924023006
PAGING NETWORK OF HOUSTON INC CEDAR HILLS, TX	Fee Number: CD9201308924023007
PAGING NETWORK OF ILLINOIS INC LAKE VILLA, IL	Fee Number: CD9201238924020001
PAGING NETWORK OF ILLINOIS INC WESTCHESTER, IL	Fee Number: CD9201238924020004
PAGING NETWORK OF ILLINOIS INC SCHAUMBERG, IL	Fee Number: CD9201238924020005
PAGING NETWORK OF ILLINOIS INC WESTCHESTER, IL	Fee Number: CD9201238924020012
PAGING NETWORK OF ILLINOIS INC WESTCHESTER, IL	Fee Number: CD9201238924020020
PAGING NETWORK OF ILLINOIS INC LOMBARD, IL	Fee Number: CD9201238924020023
PAGING NETWORK OF ILLINOIS INC CHICAGO, IL	Fee Number: CD9201238924020024
PAGING NETWORK OF LOS ANGELES INC COMMERCE, CA	Fee Number: CD9202108924044013
PAGING NETWORK OF LOS ANGELES INC LAGUNA HILLS, CA	Fee Number: CD9202108924044018
PAGING NETWORK OF LOS ANGELES INC SAN DIEGO, CA	Fee Number: CD9202108924047002
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PAGING NETWORK OF LOS ANGELES INC LAGUNA HILLS, CA	Fee Number: CD9202108924067008
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PAGING NETWORK OF LOS ANGELES INC PASADENA, CA	Fee Number: CD9202108924067011
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PAGING NETWORK OF MASSACHUSETTS INC JOHNSTON, RI	Fee Number: CD9201138924012010
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PAGING NETWORK OF MICHIGAN INC BRIGHTON TWSP, MI	Fee Number: CD9201238924020003
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PAGING NETWORK OF MICHIGAN INC ANN ARBOR, MI	Fee Number: CD9201238924020011
PAGING NETWORK OF MICHIGAN INC BRIGHTON TWSP, MI	Fee Number: CD9201238924020013
PAGING NETWORK OF MICHIGAN INC BRIGHTON TWSP, MI	Fee Number: CD9201238924020014
PAGING NETWORK OF MICHIGAN INC BRIGHTON TWSP, MI	Fee Number: CD9201238924020015


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PAGING NETWORK OF MICHIGAN INC BRIGHTON TWSP, MI	Fee Number: CD9201238924020017
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PAGING NETWORK OF NEW YORK INC MAHOPAC, NY	Fee Number: CD9201138924007004
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PAGING NETWORK OF NEW YORK INC TRUMBULL, CT	Fee Number: CD9201138924009022
PAGING NETWORK OF NEW YORK INC MORRISTOWN, NJ	Fee Number: CD9201138924009025
PAGING NETWORK OF NEW YORK INC MARTINSVILLE, NJ	Fee Number: CD9201138924010009
PAGING NETWORK OF NEW YORK INC TRUMBULL, CT	Fee Number: CD9201138924010011
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PAGING NETWORK OF NEW YORK INC CHERRYVILLE, NJ	Fee Number: CD9201138924010018
PAGING NETWORK OF NEW YORK INC SELDEN, NY	Fee Number: CD9201138924011001
PAGING NETWORK OF NEW YORK INC HIGHLAND, NY	Fee Number: CD9201138924011002
PAGING NETWORK OF NEW YORK INC TRUMBULL, CT	Fee Number: CD9201138924011003


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