

Central Oklahoma Telephone Co.

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Federal Communications Commission
Office of Secretary



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May 8, 1997

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

Re: WT Docket No. 96-18

Dear Mr. Caton:

Ventures in Paging, L.C. hereby comments on the petition for reconsideration filed by Paging Network, Inc. (PageNet), with regard to the FCC's Second Report and Order and Further Notice of Proposed Rulemaking in WT Docket 96-18. We support a number of the views expressed by PageNet. However, we must oppose its suggestion that the Commission reduce the buildout period for market area paging licensees. At page 10 of its petition, PageNet suggests that these licensees be required to extend service to one third of the population in one year, and two thirds of the population in three years. This requirement is too demanding for carriers such as Ventures in Paging, L.C., which serve less populated area. While we support efforts to prevent speculation, the faster buildout requirement will harm as many legitimate carriers as speculators. Other measures suggested in various petitions for reconsideration will more effectively weed out insincere bidders.

In the event that the FCC desires to adopt the shorter buildout period nonetheless, it should exempt small businesses, or should create an exception for Economic Areas that contain a significant number of rural communities.

Respectfully,

Steve Guest
President/General Manager
cc:Paul Madison, Esq.

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