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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Amendment of the Commission's Rules to Establish New Personal Communications Services, Narrowband PCS	)	GEN Docket No. 90-314 ET Docket No. 92-100
	)	
Implementation of Section 309(j) of the Communications Act - Competitive Bidding, Narrowband PCS	)	PP Docket No. 93-253

REPLY COMMENTS OF AMERICAN PAGING, INC.

American Paging, Inc., on behalf of itself and its subsidiaries (collectively "API"), by its attorneys, hereby submits these Reply Comments regarding the Commission's Report and Order and Further Notice of Proposed Rulemaking ("Order/Further Notice") (FCC 97-1140) in the above-captioned proceeding.

The comments submitted regarding the Order/Further Notice represent a broad range of the PCS industry and generally reflect the idea that the Commission should adhere to the phased program of narrowband PCS auctions adopted in its Competitive Bidding Third Report and Order.[1] Along with API, most commenters oppose any expansion of nationwide or regional channel allocations at this time.[2]

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[1] Implementation of Section 309(j) of the Communications Act - Competitive Bidding, Third Report and Order, PP Docket No. 93-253, 9 FCC Rcd 2941, 2951, ¶ 27 (1994).

[2] See Comments of Merlin Telecom, Inc., at 3-4; Comments of the Rural Telecommunications Group at 5-12; Comments of Motorola at 5-6; Comments of AirTouch Paging at 5-14; Comments of Ameritech Mobile Services, Inc., at 5-7; Comments of

Only the comments of Metrocall, Inc. ("Metrocall"), Arch Communications Group, Inc. ("Arch"), and Benbow PCS Ventures, Inc. ("Benbow"), which is affiliated with Arch, call for the Commission to expand national or regional channel allocations at this time.[3] Metrocall offers no justification for its position other than a vague statement that regional licenses "will provide licensees with the most efficient licensing area for the construction of area-wide networks."[4] Arch points to a supposed industry "trend toward demand for larger licensed service areas."[5] The existence of such a "trend" would appear to be conclusively refuted by the comments submitted in this proceeding from a wide range of industry participants, nearly all of whom reject the call for regional and national licensing.[6] Benbow is similarly unsuccessful in advancing any rationale for regional licensing.

Regarding allocation of the remaining 1 MHz of narrowband PCS spectrum, API stated in its comments that the Commission should allow the industry to evaluate its spectrum needs before determining the channelization and service area definitions for the reserve spectrum.[7] The vast majority of commenters support this position. The Commission should wait until

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CONXUS Communications, Inc., at 7-11; Comments of Paging Network, Inc., at 16-19; Comments of Celpage, Inc., at 5-7; Comments of PageMart, Inc., at 2-3; Comments of Morgan Stanley Partnerships at 3; Comments of Personal Communications Industry Ass'n ("PCIA") at 5-8.

[3] See Comments of Metrocall at 5-6; Comments of Arch at 7-9; Comments of Benbow at 3-4.

[4] Comments of Metrocall at 6.

[5] See Comments of Arch at 8.

[6] See supra note 2.

[7] See Comments of API at 5.

PCIA has conducted its proposed review of industry spectrum needs before channelizing the reserve spectrum.[8]

Respectfully submitted,

AMERICAN PAGING, INC.

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[8] See Comments of Motorola, Inc., at 7; Comments of AirTouch Paging at 14-20; Comments of Ameritech Mobile Services, Inc., at 7; Comments of CONXUS Communications, Inc., at 15-17; Comments of Paging Network, Inc., at 9-12; Comments of Celpage, Inc., at 7-9; Comments of PageMart, Inc., at 4-6; Comments of Morgan Stanley Partnerships at 3-4; Comments of PCIA at 8-11; Comments of Metrocall, Inc., at 6-7; Comments of Benbow PCS Ventures, Inc., at 5-8; Comments of Arch Communications at 9-10.

CERTIFICATE OF SERVICE

I, Judy Norris, a legal secretary in the firm of Koteen & Naftalin, L.L.P., hereby certify that on the 7th day of July, 1997, copies of the foregoing Reply Comments were deposited in the U.S. mail, postage prepaid, addressed to:

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