



July 25, 1997

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

97-82  
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JUL 30 9 40 AM '97  
TELECOMMUNICATIONS  
DIVISION

Chairman Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554

Re: Support for FCC Plans to Restructure C and F Block Debt

Dear Chairman Hundt:

Our firm is one of the largest cellular resellers in the United States. We bring competition to the marketplace and serve our customers by offering a choice of carriers, services and rate plans. With the introduction of PCS, we will enhance our value to consumers by expanding our wireless offerings even further.

In order for PCS to realize its full beneficial potential, it is critical that there be real competition in the marketplace. The C and F block licensees will be indispensable to attaining a truly competitive marketplace.

We strongly advocate debt restructuring to allow these licensees quickly to build out their systems, enter the market and start benefiting consumers. Delay of a liberal debt restructuring solution would be a mistake and would hurt competition and the general public.

We strongly urge you to take swift, decisive action to limit entrepreneurs' payments to the government during the early years of system buildout. This solution will encourage competition and thus enhance public benefit.

Thank you for your consideration.

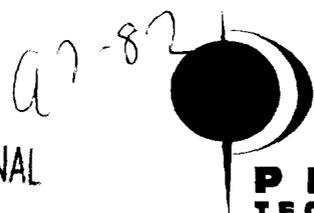
Sincerely,

Steven L. Cogswell  
President/C.O.O.

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cc: FCC Commissioners; Congressional Committees

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Chairman Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554

PREPAY  
TECHNOLOGIES

June 21, 1997

Re: WT Docket 97-82

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JUN - 1 1997

FEDERAL COMMUNICATIONS  
COMMISSION  
WASHINGTON, D.C. 20541

Dear Chairman,

Within the past few years, the you have seized the opportunity to create **true competition** in the wireless industry, first by creating the PCS band, and more importantly by establishing the Entrepreneur's Block. As a wireless reseller we were excited about our future due to the promise of the Entrepreneur's band providing the resale economics which the incumbent cellular and A&B block PCS winners do not deliver.

Prepay Technologies was established in 1996 to provide prepay wireless service on a wholesale basis to companies who are currently providing cellular service or PCS services on a retail, credit basis. We are based in California and maintain an operation of approximately 30 employees and independent contractors. Given the recent developments and growth in the PCS market, we look forward to the reselling opportunity that PCS has to offer.

Even though the first set of PCS licensees were predominately incumbent carriers, we as resellers, began the innovative planning process in anticipation of the Entrepreneur's of "C" block auction which should be called the Consumer or Competitive Block. The Consumer Block winners offer the promise for true competition, both facilities and non-facilities based in the wireless industry. For instance, Consumer Block licensee **NextWave** intends to offer only wholesale minutes while also offering facilities based resale. The carrier deliberately planning to not compete with its resale customers. This creates huge opportunity for small businesses participating in the wireless industry.

With such a bright future, our resale opportunity now hangs in the balance. Two years after the big businesses have secured their financing and have launched in many markets, the C block winners are facing difficult financial markets. Small businesses' access to capital is always limited, but after licensing delays, and the public markets devaluation of wireless stocks, particularly new entrant's issues, these new licensees are hard-pressed to access capital as displayed by Chase Telecom's recent postponement of their high yield offering.

On March 31<sup>st</sup>, the payments due from the auctions were suspended indefinitely by you. This short term solution without a definitive future payment schedule has made it even more difficult for these licensees to secure domestic capital to build their networks. Knowing that you are fully aware of these difficulties and are considering ways to ensure the *promise* of the Entrepreneurs' Block, please consider exercising the prominence of your position by pushing for swift, decisive action in restructuring the license payments.

My company's viability as a national reseller rests on the success of the Consumer Block winners. Our business plan has been developed around the opportunity afforded us by true and fair wireless competition. Please work diligently to afford the small businesses in America the chance to create true competition in wireless communication; an industry historically dominated and currently controlled by big business.

Chairman, your consideration and action on these time sensitive issues is greatly appreciated. Please respond at your earliest convenience.

Sincerely,

Larry Hecox  
President  
Prepay Technologies

c.c. Commissioner James H. Quello, Commissioner Rachelle B. Chong,  
Commissioner Susan Ness & William F. Caton

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MLC



Cynthia Bailey, President

# CX Systems Int'l, Inc.



M. A. Hepburn, Vice President

P. O. Box 3452, Plant City, FL 33564-3452

Email: CX97@AOL.com & Fax (813) 737-9117 & Phone (813) 737-5312

• International Business Market Analysts • World Trade Research Consultants • Import & Export, Etc.

June 23, 1997

97-82

Chairman Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554

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OCT - 1 1997

Dear Chairman Hundt:

Our company is in strong support of a flexible plan to allow financing for the Entrepreneur's block, or C block auction. This will give small companies an opportunity to compete fairly in the wireless telecommunications industry.

The United States of America has always created open and fair consumer markets with competition in business. The FCC should look for ways to keep the access to these markets open in the wireless industry for small companies, and work real hard on a proposal to help restructure C and F block debts without delaying construction of the Entrepreneur's networks.

As a small business owner, I hereby make an appeal to you for full support to keep the wireless telecommunication industry open and fair in C and F block debt restructuring.

Your consideration in this matter will be greatly appreciated.

Sincerely,

Malcolm A. Hepburn  
Vice President

Cynthia R. Bailey  
President

MAH:CB

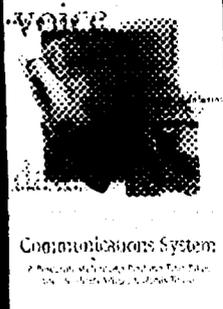
cc: Commissioner James H. Quello  
Commissioner Rachelle B. Chong  
Commissioner Susan Ness

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97-82

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**United Calling Network, Inc.**  
**United Calling Card, Inc.**  
**United Cellular Services** A Licensed Public Utility U-4127-C



SOLUTIONS FOR THE FUTURE

Wednesday, September 3, 1997

Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554  
Fax No. (202) 418-2801

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SEP - 1 1997

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

Re: Comments on Public Notice - WT Docket 97-82

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Dear Chairman Hundt:

In my previous correspondence to you on June 23, 1997 and July 3, 1997 regarding the C-block auction licensees' request for restructuring of their license debt, I have attempted to stress the impact of a negative decision by the Federal Communications Commission. Although United Calling Network, Inc. ("UCNI") is not a C-block licensee, we are contractually tied to NextWave Telecom Inc. for the next 10 years.

As a switched reseller of PCS minutes of use for NextWave, UCNI has a vested interest in what happens with NextWave's licenses and the build-out of their network. Any loss of C-block licenses or delay in the scheduled build-out/ deployment schedule would be extremely detrimental to our company.

Based upon the contract with NextWave, UCNI has foregone starting traditional local loop service in order to simultaneously open markets in NextWave's footprint. Additionally, UCNI has purchased tens of millions of dollars worth of Lucent Technologies / Bell Laboratories equipment which is to be used exclusively with CDMA/PCS service.

One of the major factors that the FCC should consider is the billions of dollars worth of "stranded debt" which would be lost should the C-block licenses be re-auctioned. Speaking of in terms of our own situation, UCNI has committed tens of millions of dollars to become a switched reseller of NextWave's PCS minutes. I know that NextWave has already spent hundreds of millions of dollars in building out their digital network throughout the country.

WEB ADDRESS  
UCNETWK@AOL.COM  
UCNETWK1@MSN.COM

27068 LA PAZ ROAD, SUITE 403  
LAGUNA HILLS, CALIFORNIA 92656  
OFFICE 213-939-3630 FAX 213-939-2627

The C-block auction licensees that are requesting the restructuring of their debts are irrevocably joined to all of their equipment suppliers, resellers and other strategic partners. Not only are these license winners in jeopardy of losing all of their investment, all of their contractual and strategic partners stand to lose everything they have invested. The domino effect could have disastrous, lingering results. If the C-block licenses are revoked and reaucted, there may never be any "true" competition in any of the telecommunications markets, let alone the PCS market.

I realize that the "opposing" forces to any debt restructuring are citing such colorful terms as "a deal is a deal" and "if they want to play, they have to pay" to support the notion of the FCC deny any relief to C-block licensees. Of course, the incumbent telecommunications giants such as AT&T and Sprint welcome a revocation and reaucting of the licenses. It would mean a further delay in competition in PCS and, practically speaking, an end to any competition in the PCS market. The A & B block auction licensees received a 18-month head start between the auctions and now an additional 24 months since the end of the C-block bidding. Without a definitive answer or decision by the FCC, the incumbents will have had a 4-year jump on any competition in PCS and, each passing day without a decision, the C-block licensees lose even more ground on the incumbents.

It is very difficult to reconcile the legislative mandate of the C-block licenses (small business entrepreneurs) and the fact that the C-block winners paid 4 to 5 times more per POP for their licenses than the A & B block licensees. The FCC seemed to misinterpret the intent of the Congress to give small business an opportunity to participate in PCS. It now seems as though the only interest the FCC had in the C-block was to make extra money for the U.S. Treasury and not to open the PCS market to all competitors.

However, that strategy has not come to pass. The C-block licensees paid too much per POP for their licenses and cannot pay for the licenses and their network build-outs. A reason for this dilemma is due to the traditional capital markets losing faith in the stability and viability of PCS, particularly when it comes to "new" untested companies, such as NextWave. We at UCNI have felt the backlash of this trend when we attempted to raise capital. Not only is UCNI a minority owned, small business but it has not previously provided any service to the public. This fact along with our ties with NextWave have kept capital investors at arms length. No one has been willing to invest in our project with NextWave's licenses and future in the balance.

UCNI is a switched reseller of NextWave's minutes. We have commitments to purchase equipment from Lucent Technologies/Bell Laboratories. UCNI is also contractually bound to purchase its CDMA handsets from Sony/Qualcomm and 40 other licensed manufacturers. We have also begun the process of setting up our own network of authorized agents and dealers. So, even though, NextWave is on record with its "stranded debt" in the C-block licenses, UCNI has everything to lose as well as our contractual partners. Once again, the FCC cannot ignore the "domino effect" that a negative decision will have on all of the C-block licenses.

Reed E. Hundt, Chairman  
September 3, 1997  
Page Three

*We urge the FCC to reach a quick and positive decision. Isn't a 4-year handicap in the PCS marketplace punishment enough for the C-block winners? Please grant these licensees some relief so that can build their networks and pay the government for the licenses. A revocation of the licenses and a reauction would not result in any more money to the government. The new bidders would come in with much lower bids and still have the same capitalization problems for paying for their licenses and building their network.*

*There are viable solutions to grant relief and not let the C-block licensees "off the hook." Please understand that these license winners are not standing alone. They all have billions of dollars of "stranded debt" and all of the companies with whom they are contractually obligated also have much, if not everything, to lose by the FCC refusal to grant the requested restructuring relief.*

*Your anticipated courtesy, cooperation and prompt attention are greatly appreciated.*

Very truly yours,

*Phillip Van Miller*

Phillip Van Miller

PVM/sa

cc - President William J. Clinton  
Vice President Albert Gore, Jr.  
FCC Commissioner James H. Quello  
FCC Commissioner Rachelle B. Chong  
FCC Commissioner Susan Ness  
FCC Secretary William Canton  
Representative Maxine Waters  
Representative Julian C. Dixon  
Representative Thomas J. Bliley  
Representative Edward Markey  
Representative W.J. Tauzin  
Representative John Dingell  
Senator James M. Talent  
Senator Christopher Bond  
Senator John McCain  
Senator Ernest Hollins  
Senator Conrad Burns  
Eric M. Nakasu, Esq., Chief General Counsel UCNI

WT 97-82

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Barry I. Schiffman  
280 Mimosa Way Perris Valley, CA 94028  
Voice: (650) 233-0304 FAX: (650) 233-0322 eMail: homeacct@pacbell.net

September 20, 1997

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SEP - 1 1997

Chairman Reed Hundt  
Commissioner James Quello  
Commissioner Rachelle Chong  
Commissioner Susan Ness  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

**Re: The C Block Dilemma**  
Real or Imaginary?

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Dear Chairman Hundt and Commissioners Quello, Chong and Ness:

**Why read this letter?**

With the default of several of the major winners of the C Block auction, you are faced with a very tough decision, in uncharted waters, that has the potential of large economic and political implications. As an individual that has been intimately involved in the C Block process for the past five years and as a significant investor in the innovative and entrepreneurial side of the U.S. telecommunications industry for the past ten years, I believe my points of view may be of some benefit in helping you resolve the dilemma you are facing.

**Who am I?**

I am a venture capitalist. Specifically, the president of JAFCO America Ventures (JAFCO) and a special limited partner at Weiss, Peck & Greer Venture Partners (WPGVP). As a general partner at WPGVP, I made an investment in a designated entity, AirGate Wireless, and remain a managing principal of the company.

The two firms I am associated with have been instrumental in supporting the rapid entrepreneurial and technical growth of both the U.S. and worldwide tele and data communications industries. Firms we have invested and supported include: Ciena, Advanced Fiber Communications, Premisys, P.COM, Harmonic Lightwave, Objective Systems Integrators, Clear Communications, Wireless Access, Unwired Planet, PSInet, International Wireless, GoDigital, SoftWire and Adicom.

While I've listed the companies we have invested in, we really place our faith and capital in the people that founded these companies. Using AirGate as example, prior to the auction we had assembled a team that consisted of:

- Experienced entrepreneurs who had previously won licenses and operated wireless services in our geographic area of focus, the southeast.
- A strategic partner, experienced in operating wireless services worldwide, Bell Canada.

Barry J. Schiffman

September 20, 1997

- A New York bank that had agreed in writing to raise the hundreds of millions of dollars needed to finance the buildout based on a well vetted business plan using rational license pricing and our intimate knowledge of the true cost of build out plus attracting and retaining subscribers.

### The Dilemma

Due to a lack of understanding concerning the psychology and the makeup of the entrepreneurial marketplace, the C Block auction process allowed for the uneconomic allocation of the licenses. I say uneconomic because the capital markets have spoken and the message is very clear: The prices paid by and the quality of the companies currently holding a significant portion of the C block licenses do not result in viable economic entities in which financial institutions experienced in investing in the telecommunications industry, are willing to invest.

PCS is great technology. All one needs to do is travel through Europe and Asia to see significant portions of the population walking through the streets with low cost, high quality digital wireless telephones. The U.S. is behind in implementation of PCS, a fundamental infrastructure technology that is proven to have a high correlation to growth of GNP.

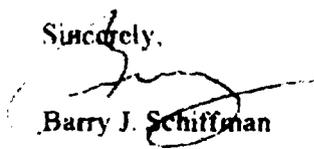
I believe one of your primary goals for the PCS auctions was to increase competition to decrease the time to market for this technology. And with out being trite, in this instance time is money in many ways:

- For the economy, delays in implementation of PCS reduces the competitive pressure on the installed base of cellular providers to innovate and price competitively.
- For the government, the procrastination on resolving the C block defaults is costing wasted effort belaboring the decision of what is "right and fair" and resulting in no payments at all.
- The lack of resolution is casting a pall over the financing of the PCS market in total because the C block is a big portion of the spectrum that can not be reliably forecasted as to when it will enter the market.

### A Point of View

If government is the art of compromise among the many points of view of its constituents, then there will always be some who feel things are not "fair". The C block licensees who are currently in default are not large companies with thousands of employees. If they go out of business due to poor judgment by their management it will not leave thousands on the street unemployed. On the other hand, there are many companies with committed capital waiting in the wings that would gladly bid on these licenses at rational prices and get on with expeditiously bringing an innovative and competitive PCS market to the United States.

Sincerely,

  
Barry J. Schiffman

cc: Shelley Spencer

**BOTTI BROWN  
ASSET  
MANAGEMENT**

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655 MONTGOMERY STREET, SUITE 600  
SAN FRANCISCO, CALIFORNIA 94111  
(415) 263-1890 FAX (415) 399-9828

September 19, 1997

Mr. Jon Garcia   
Director - Strategic Analysis  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M Street Room 822  
Washington, DC 20554

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SEP - 1 1997

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SEP 22 1997

Dear Mr. Garcia:

Botti Brown Asset Management is a registered investment advisor managing over \$65 million for equity investors, with a focus on bandwidth technology stocks and wireless in particular.

We at Botti Brown believe that the best way to handle the PCS spectrum license question is to license the spectrum to whoever is willing to pay the value of the winning bid plus FCC interest. Until such a buyer materializes we believe the spectrum should remain unused. Obviously we do not view it fair or appropriate for the auction "winners" that cannot pay to be given payment terms that differ from those of the auction.

We give the following reasons for "warehousing" the spectrum:

- This approach is fair to the auction participants who are solvent. It does not penalize the discipline of executing a viable business plan.
- From the end consumer's perspective there is plenty of spectrum. A delay in deployment of C-block licenses will not materially effect consumer choice.
- The FCC stands a better chance to receive license proceeds at the level bid for in the auctions since interest will accrue at a rate below what we believe will be industry growth. At some point in the future these licenses will be financeable as industry maturity takes the execution risk out of the enterprise value of the would-be license holder.

Should you have any questions, or if there is any other way we can be of assistance, please feel free to contact me at (415) 263-1890 or via e-mail at [mrobison@bottibrown.com](mailto:mrobison@bottibrown.com).

Sincerely,



Matt Robison  
General Partner

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List A B C D E

WT 97-82

**ELDORADO COMMUNICATIONS, L.L.C.**

**860 Ridge Lake Blvd.**

**Suite 312**

**Memphis, TN 38120**

**Phone: (901) 763-3333 / Fax: (901) 763-3369**

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AUG - 1 1997

August 13, 1997

Mr. Jon Garcia *JG*  
PCS Restructuring Task Force  
Federal Communications Commission  
1919 M Street, N.W., Room 822  
Washington, DC 20554

Dear Mr. Garcia:

I am sending you this letter on behalf of Eldorado Communications, L.L.C. ("Eldorado") which was a participant in the "C" block auction. Eldorado was formed by numerous small investors to purchase second tier PCS markets which Eldorado planned to build out in conjunction with our larger "C" block neighbors. Unfortunately, because of the over exuberance of some "C" block bidders, we were unable to purchase a significant block of properties and we finished the "C" block auction with only three markets: Blytheville, Arkansas, Eldorado, Arkansas, and Tupelo, Mississippi. These markets represent less than 500,000 pops.

We, therefore, have a very small base of properties and can not accomplish our development without a working relationship with our "C" block neighbors. Unfortunately, due to the financing structure of the "C" block, our neighbors have overextended themselves and are unable to buildout their systems. This has negatively impacted our ability to develop our properties. We, therefore, have markets that are diminishing in value due to the market circumstances of our neighbors and the daily development of our competitors.

I have somewhat ambivalent feelings toward the situation as it exists today for the "C" block markets. Because the larger companies overspent, they drove up the prices for smaller entrepreneurial companies, like Eldorado, which limited the number of markets we could buy. Furthermore, now that the larger companies control these properties, they are unable to build them which gives us further problems because we can not develop our few markets as stated above. Again, the value of these markets continues to erode as a function of time, competition, and the additional spectrum the FCC keeps dumping on the market.

Obviously, mistakes were made by both the FCC and the individuals purchasing the "C" block licenses and now everyone wants a solution to the problem. I believe that any solution has to be

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one that will address the "C" block participants who were unsuccessful due to their conservative bidding strategy versus the large "C" block purchasers who drove up the prices of the "C" block. **(It is unfair for the undisciplined companies to benefit at the expense of the more prudent companies who did not bid the high prices.)**

In this context, I would like to propose the following three-part program which would provide relief for all parties:

**First:** I would provide relief for any company that is willing to surrender 70% of its pops or greater in the form of a surrender credit.

**Second:** For voluntarily surrendering their markets, I would give credit for each pop returned to the FCC of approximately 130% of the original per pop cost, but only if the company turns in 70% of its pops or greater.

An example of this voluntary surrender is set forth as follows:

10,000,000 pops originally purchased at \$20.00 per pop = \$200,000,000 owed to U.S. Government.

10,000,000 x \$20 =	\$200,000,000
Less down payment of 10%:	<u>20,000,000</u>
Balance:	\$180,000,000

The company would surrender 70% of 10,000,000 pops which would earn approximately \$180,000,000 in credit for the company (7,000,000 x \$20 x 130%). The company can then apply the \$180,000,000 credit against the \$180,000,000 it owes the government which will result in a balance owed to the U.S. Government of \$0.

By receiving this credit for voluntarily returning a substantial portion of its pops, the company would have net cost for the remaining 3,000,000 pops of: \$20,000,000 cost / 3,000,000 = \$6.66 per pop or 33.3% of the original price (which equals the 10% down payment already made on all pops won at the auction).

**Third:** With all the pops that are returned, I would have a re-auction. This auction would be limited to those who participated in the original "C" block auction. This auction would be subject to the following rules:

1. No company could acquire more than 10,000,000 pops in the re-auction.
2. If an existing "C" block owner is above the 5,000,000 cap already, they would be allowed to buy another 5,000,000 pops.
3. Auction would be for cash with no financing.
4. If it was a small company and could not use all of its credit as set forth above, it would be allowed to use this credit in the re-auction.
5. Auction would last for one week. Whoever is the highest bidder at the last round will win the market even if there were other lower bidders. If you have a tie, you could have a one day "bid off" for those markets.

The reason I think this is a reasonable proposal is that it accomplishes the following:

1. If companies avail themselves of the proposal set forth above, the re-auction would give the small entrepreneurial companies that were unsuccessful or had limited success in the initial auction a chance to participate which was supposed to be the main goal of the "C" block auction.
2. The FCC can justify this plan because it does not reduce the price for the pops that were auctioned. It simply rewards companies for voluntarily returning pops and giving the small companies a chance to participate in the wireless business.
3. In addition, companies that use this plan will not be granted debt relief by the FCC but will be given an actual credit for a return of property ("licenses").
4. This is a defensible proposal as opposed to simple debt relief or automatic discount because it will require the existing "C" block owners to divest a significant percentage (70%) of their pops in return for exercising this option. It is not a one sided "give away".
5. This would be a voluntary plan with the present "C" block owners retaining the option to keep all their pops or return their pops to the FCC under this plan. No company is forced to exercise this option.
6. The market owners who participate in this program should be financially strengthened after their divestiture.
7. This will not create the problem of putting additional spectrum on the market that the 10 MHz carve out/price reduction plan would cause.
8. The "C" block owners would have a full 30 MHz that should be important in the future with new applications and technologies being developed.

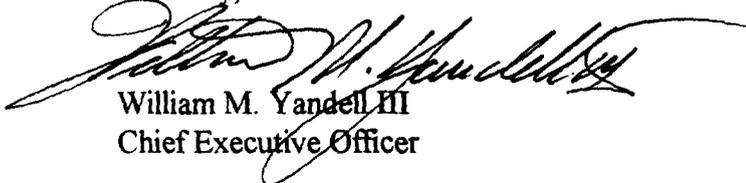
In conclusion, while no plan is perfect, this one has both sacrifices and rewards for the existing "C" block owners who take advantage of it, while also allowing the government to accomplish its primary objective of the "C" block auction by helping the small entrepreneur develop a business.

We have placed a copy of this letter in the formal docket for this proceeding.

If you have any questions or would like to discuss this further, please contact me at (901) 763-3333.

Your consideration of the proposal set forth hererin is greatly appreciated.

Sincerely,



William M. Yandell III  
Chief Executive Officer

WMY:tg

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THE WHITE HOUSE  
WASHINGTON

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U.S. DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION

MEMORANDUM FOR:

FCC

(25)

FROM:

SUE J. SMITH *SJS*  
DIRECTOR, OFFICE OF AGENCY LIAISON

SUBJECT:

REFERRAL OF WHITE HOUSE BULK MAIL

Thank you for your continued hard work in ensuring responses to the Presidential letters and inquiries forwarded to your agency. The volume of mail that the President and Mrs. Clinton receive still remains unprecedented.

Please return any misreferrals to me at the following address:

Ms. Sue J. Smith  
Director, Office of Agency Liaison  
Room 6, OEOB  
The White House  
Washington, D.C. 20500

If you have any questions, please do not hesitate to call me at 202/456-7486.

Thank you very much.

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**fax**

**To:** President William J. Clinton  
**Company:**  
**Fax Number:** +1 (202) 456-2461  
**Business Phone:**

**From:** United Calling Network, Inc.  
**Fax Number:** +1 (213) 939-2627  
**Business Phone:**  
**Home Phone:**

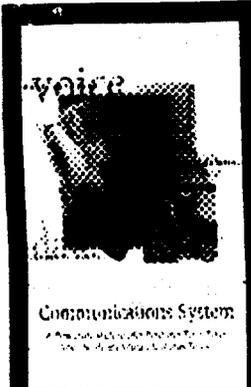
**Pages:** 3  
**Date/Time:** 6/26/97 1:14:47 PM  
**Subject:** United Calling Network, Inc.

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Dear President Clinton - Attached you will find our company's response to the FFC's Public Notice of WT Docket 97-82 of June 2, 1997. Your immediate attention to this matter would be greatly appreciated.

FCC

**United Calling Network, Inc.**  
**United Calling Card, Inc.**  
**United Cellular Services** A Licensed Public Utility U-4127-C



SOLUTIONS FOR THE FUTURE

Thursday, June 26, 1997

**President William Jefferson Clinton**  
**The White House**  
**Washington, D.C.**

**Re: Comments on Public Notice – WT Docket 97-82**

**Dear President Clinton:**

**United Calling Network, Inc. ("UCNI") is a "minority" owned licensed Public Utility and a reseller of Personal Communication Services ("PCS"). Presently, the resale opportunity in cellular and the A and B block PCS winners is not competitive and we look forward to true competition being offered in the C-block. In fact, we intend to provide PCS equipment and service in every state and city in which NextWave has secured licenses, since NextWave intends to offer only wholesale minutes and is not competing with any of its resale customers.**

**This letter is a response to Public Notice of the Federal Communications Commission ("FCC"), dated June 2, 1997. We realize that the FCC is attempting to assist the C-block auction licensees by restructuring the license payments. It is also very apparent that uncertainty has caused even greater hardships on the C-block licensees than the license payments themselves as displayed by Chase Telecom's most recent postponement of their high-yield offering.**

**UCNI, for its own selfish reasons, is concerned about the viability of C-block. Although UCNI is not a C-block licensee, this uncertainty of future payments to the FCC has a "domino effect" on our business. As a reseller, building and creating a network of agencies and dealerships were based upon certain factors. The amount and timing of license payments to the FCC was a**

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*critical factor for the licensees to build their network.*

*UCNI is a corporation that truly embodies the "spirit" of the C-block or "Entrepreneur" block auction, as we are solely owned by a minority, we also qualify as a "small business" and we are "entrepreneurs." However, we do not want or expect any preferential treatment from the FCC or any government body. Being a minority-owned small business does not mean that we need hand-outs or protection by "Big Brother." The purpose of the C-block auctions was to give minorities, small business and entrepreneurs a level playing field with the giant incumbent telecommunication companies.*

*In order for all licensees to begin budgeting for their respective futures and allocating funds for payments of licenses, they require swift, immediate action. UCNI had expected to launch PCS service as early as June of 1997 but these delays have pushed projected launch dates back as far as six (6) months. Unlike the telecommunications "giants" we cannot afford any more set backs. Otherwise, we may end up in the same situation as Pocket Communications, Inc..*

*We recognize that the purpose of Public Notice WT Docket 97-82 in suspending payment on C-block auction licenses is an attempt to alleviate the financial burden on capital strapped licensees. However, without some official indication of the schedule of future payments, it will create further havoc on these minority-owned small businesses.*

*We urge the FCC to take quick and decisive action in resolving this issue. Time is not the ally of the small business entrepreneurs, it is the ally of the cash-generating telecommunications incumbents.*

*Your anticipated courtesy, cooperation and prompt attention to this matter are greatly appreciated.*

*Very truly yours,*

*Phillip Van miller*

*Phillip Van Miller, CEO  
United Calling Network, Inc.*

cc - *Vice President Albert Gore, Jr.  
FCC Chairman Reed E. Hundt  
FCC Commissioner James H. Quello  
FCC Commissioner Rachelle B. Chong  
FCC Commissioner Susan Ness  
FCC Secretary William F. Caton  
Representative Thomas J. Bliley  
Representative Edward Markey  
Representative W.J. Tauzin  
Representative John Dingell  
Senator James M. Talent  
Senator Christopher Bond  
Senator John McCain  
Senator Ernest Hollings  
Senator Conrad Burns  
Eric M. Nakasu, Esq., Chief General Counsel UCNI*