

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

In the Matter of )  
)  
Amendment of Part 90 of the )  
Commission's Rules to Facilitate )  
Future Development of SMR Systems )  
in the 800 MHz Frequency Band )  
)  
Implementation of Sections 3(n) and 322 )  
of the Communications Act )  
Regulatory Treatment of Mobile Services )  
)  
Implementation of Section 309(j) )  
of the Communications Act )  
Competitive Bidding )

PR Docket No. 93-144 /  
RM-8117, RM-8030  
RM-8029

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FEB 27 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

GN Docket No. 93-252

PP Docket No. 93-253

To: Daniel B. Phythyon, Chief  
Wireless Telecommunications Bureau

**REPLY**

North Sight Communications, Inc. ("North Sight"), through counsel, hereby respectfully submits its Reply to the Opposition to Petition for Partial Reconsideration filed by TELECELLULAR in the above-captioned proceeding.<sup>1</sup>

**I. WHO DID THE FCC GRANT AN EXTENSION TO?**

**A. WHO REPRESENTS WHOM?**

The licenses at issue here were granted as the result of applications listing the contact person as Marie T. Cling of Cling Communications, Inc., P.O. Box 6069, Northfield, OH 44056 in late 1992

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<sup>1</sup>The parties had requested an extension in order to enter into negotiations to settle the matter. However, such discussions have not yielded an agreement.

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and early 1993.<sup>2</sup> In late 1992 the applicants filed requests to incorporate in the State of Delaware. These requests were prepared by Express Communications, Inc.,<sup>3</sup> a company founded by Pendleton Waugh.<sup>4</sup> Some of the licenses were subsequently modified as the result of applications prepared by the law office of Richard S. Myers.<sup>5</sup>

On May 24, 1994, the law firm of Richard S. Myers filed a "Request for Extended Implementation Period". The filing states that it is filed by "[t]he participating Specialized Mobile Radio ('SMR') licensees in TELECELLULAR ('Participating Licensees')". It is further stated that "Telecellular is a joint venture which currently includes thirteen separate SMR licensees..."<sup>6</sup> To North Sight's knowledge, the Request did not include any signatures from any of the "participating licensees", or from any person claiming to be a principal of "TELECELLULAR".<sup>7</sup>

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<sup>2</sup>See, Exhibit 1 attached hereto.

<sup>3</sup>See, Exhibit 13.

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<sup>5</sup>See, Exhibit 1. North Sight will refer to the numerous filings in this proceeding by the law firm which made the filing, since the various Telecellulars involved make the fact pattern difficult to follow. Such reference is not intended to disparage the respective firms in any way, rather it is meant to distinguish the filings and participants.

<sup>6</sup>See, Exhibit 2. Subsequent modifications were also filed.

<sup>7</sup>TELECELLULAR'S Opposition attempts to minimize this failure by claiming that other wide-area authorizations were granted without consent letters from the licensees. North Sight is not aware of such action by the Commission, and if such action was taken, was clearly erroneous. Further, for TELECELLULAR to assert that its violation of the Commission's Rules is ok because others have violated the same rule is not compelling, and certainly did not deter the Commission from refusing to issue licenses to other applicants. See, Viking Dispatch Services, Inc., 11 FCC Rcd 6685 (1996). Further, TELECELLULAR's claim that North Sight should have filed a reconsideration two years ago is similarly unavailing. As noted by TELECELLULAR itself, the Commission may take action pursuant to Section 312(a) of the Communications Act "... because of conditions coming to the attention of the Commission which would warrant it in refusing to grant a license or permit on an original application." See, for example, Mark Sobel, WT Docket No. 97-56, 97D-13, released

On September 27, 1994, the Chief, Land Mobile Branch, sent a letter to the law firm tolling the construction dates for the listed licenses. The letter states that the request was filed "... on behalf of the participating licensees in TELECELLULAR."<sup>8</sup>

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On February 27, 1995, the Chief, Land Mobile Branch, sent a letter to the law firm granted an extended implementation period. The letter states that the request was filed "... on behalf of TELECELLULAR."<sup>11</sup>

On March 1, 1995, the law firm filed Reply Comments in PR Docket No. 93-144 on behalf of "TeleCellular de Puerto Rico, Inc."<sup>12</sup>

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November 28, 1997 (Adm.L.J., 1997).

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Virgin Islands.<sup>18</sup> According to the letter, PCC was to be acquired by Key Communications Group in Denver. The letter states that Key is owned by NATTEM, USA. A letter dated October 5, 1995 claims that NATTEM, USA, Inc. changed its name to ComTec International, Inc.<sup>19</sup> Waugh and his associates have also obtained FCC licenses under the names Smartcomm LC and Hunt Communications LC.<sup>20</sup> Waugh subsequently pled guilty to conspiracy to structure financial transactions to evade reporting requirements in violation of Title 18 U.S.C. §371 and was sentenced to 21 months in the U.S. Bureau of Prisons and fined \$20,000.<sup>21</sup> Waugh subsequently was disbarred as an attorney in Texas on August 3, 1995.<sup>22</sup>

On June 20, 1997, a Petition for Reconsideration of the Commission's denial of continued extended implementation authority was filed by "TELECELLULAR" through the law firm of Lukas, McGowan, Nace & Gutierrez.<sup>23</sup> This filing claimed that Telecellular de Puerto Rico, Inc. "... has a network management role in relation to the individual licensees participating in the Network. It has responsibility for facilitating and managing all activities necessary for the construction and ongoing operation of the Network, consistent with the rules and policies governing the management of FCC-licensed stations."

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<sup>21</sup>See, Exhibit 18.

<sup>22</sup>See, Exhibit 19.

<sup>23</sup>See, Exhibit 20.

On November 7, 1997, a Request for Waiver was filed by “Telecellular, Inc.” through the law firm of Day & Catalano, PLLC.<sup>24</sup> This filing included a “Certification” from Paul J. Conrad, who claims to be Vice President of Telecellular, Inc. In addition, it should be noted that Paul J. Conrad is the signatory on the Caribbean Spectrum, Inc. applications,<sup>25</sup> and the November 21, 1997 Request for Involuntary Assignment of certain licenses to Telecellular de Puerto Rico, Inc. filed by the law firm of Lukas, McGowan, Nace & Gutierrez claims that Conrad is an 11.54% owner of Telecellular de Puerto Rico, Inc.

The June 20, 1997 filing by Lukas, McGowan, Nace & Gutierrez on behalf of “TELECELLULAR” claims that it is the representative of the licensees.<sup>26</sup> The November 7, 1997 Request for Waiver from Telecellular, Inc. includes signed documents entitled “Written Consent of Majority of Shareholders” for nine of the “Participating Licensees”.<sup>27</sup> This filing claims that that the filer is the representative of these nine licensees. The January 7, 1998 “Opposition to Petition for Partial Reconsideration” filed by the law firm of Lukas, Nace, Gutierrez & Sachs on behalf of “TELECELLULAR” claims at footnote 37 that “none of the participating station licensees have indicated an intent to withdraw from TELECELLULAR.”<sup>28</sup> However, it is unclear what authority

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<sup>26</sup>Page 5 of the June 20, 1997 Lukas, McGowan filing states that Telecellular de Puerto Rico, Inc. was the target of the lawsuit by Telecellular, Inc., but then states that “... TELECELLULAR has defended itself against the lawsuit and successfully counter-sued.” See, Exhibit 22. However, North Sight has been unable to locate any evidence that TELECELLULAR (the joint venture) was a defendant in the law suit.

<sup>27</sup>See, Exhibit 20.

<sup>28</sup>The Lukas, Nace filing provides no evidence of this claim.

Lukas, Nace has to make any filings with the Commission on behalf of TELECELLULAR. It is clear that Day & Catalano represents Telecellular, Inc., and Lukas, Nace represents Telecellular de Puerto Rico, Inc.<sup>29</sup> However, since there is a court battle to determine which entity is rightfully the manager of TELECELLULAR, it would seem that any filing by TELECELLULAR must be by the licensees, not the alleged managers.

**B. The Petition For Reconsideration Was Based Upon False Premises**

Whatever the outcome of the Puerto Rico litigation, and regardless of who is the correct representative, the Lukas, McGowan Petition for Reconsideration represented to the Commission that TELECELLULAR's failure to construct its system "... was due to unforeseen circumstances beyond its control."<sup>30</sup> The Lukas, Nace January 7, 1998 Opposition to Petition for Reconsideration claims that TELECELLULAR should not be held responsible "... where its business agreements were canceled as the result of a frivolous third-party lawsuit."<sup>31</sup> However, a review of the parties clearly demonstrates that no "third-party" is at issue here. Rather, it is a struggle between some portion of the licensees against some other portion of the licensees to determine who will be the manager of the system and apparently determine their fate. This is where the Bureau's finding is in error. The Bureau apparently believed that Conrad's alleged tortious interference was as a third party, when in fact he is a significant shareholder in Telecellular de Puerto Rico, Inc. and is one of the "Participating Licensees".

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<sup>29</sup>One assumes that this representation is through majority vote, since Paul Conrad is a minority stockholder of Telecellular de Puerto Rico, Inc. as well as a principal of Telecellular, Inc.

<sup>30</sup>Petition for Reconsideration at 13.

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Further, as much as the TELECELLULAR filings attempt to make Pendleton Waugh out to be the “third party”, in fact the various documents clearly demonstrate that this venture was Waugh’s project from the beginning, including establishment of the corporations.<sup>32</sup> The dispute here is clearly one involving the principals, and the Bureau erred in reversing its decision regarding TELECELLULAR’s rejustification on the basis that some “third party” had tortiously interfered. In fact, it is interesting to note that Telecellular, Inc.’s January 20, 1998 “Comments” by Day & Catalano claims at page 2 that Lukas, McGowan’s Telecellular de Puerto Rico, Inc. is the third party!<sup>33</sup>

There is no need for the Bureau to make any findings whatsoever with regard to the Puerto Rico litigation. Rather, the Bureau may simply make its decision in this case based upon the one representation made for the rejustification extension, which is the allegation that business circumstances beyond TELECELLULAR’s control prevented its construction of even a single facility. The record clearly demonstrates that this is a dispute between the licensees, and who they want to construct their system, and is a matter which is entirely within their control.

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<sup>32</sup>Lukas, Nace’s January 7, 1998 Opposition discusses North Sight’s request that the Bureau review the participating licensee’s authorizations to determine whether there were violations of the “40 Mile Rule”. The Opposition compares the TELECELLULAR licenses to wide-area requests filed by Advanced MobileComm, Inc. (a subsidiary of Fidelity Ventures) and others. However, in the case of each of the referred to filings, the filing was made by an existing operator with existing, fully-loaded systems. As noted by TELECELLULAR itself, the creator of this venture, Pendleton Waugh, has a less than sterling record in the telecommunications area. The comparison of Pendleton Waugh to Fidelity Ventures is amusing, at best.

<sup>33</sup>See, Exhibit 23.

## II. CONCLUSION

In sum, the Bureau failed to properly review the applications filed by the licensees, as well as the Extended Implementation Request. The Bureau's determination that the lawsuit presented a circumstance for which relief could be granted was in error. Finally, the Bureau's determination that the lawsuit was beyond Telecellular's control was in error.

WHEREFORE, the premises considered, it is respectfully requested that the Bureau: (1) RECONSIDER its action of November 12, 1997; (2) INVESTIGATE the bona fides of the underlying licensees and of Telecellular; (3) REVOKE the licenses which do not meet the Commission's Rules with regard to former Section 90.627; (4) REVOKE the licenses which do not meet the Commission's standards for management agreements as recently reiterated in Marc Sobel, WT Docket No. 97-56, 97D-13, released November 28, 1997; and (5) TERMINATE the extended implementation authority granted to Telecellular.

Respectfully submitted,

NORTH SIGHT COMMUNICATIONS, INC.

By:   
Alan S. Tilles, Esquire

Its Attorney

Meyer, Faller, Weisman & Rosenberg, P.C.  
4400 Jenifer Street, N.W.  
Suite 380  
Washington, D.C. 20015  
(202) 362-1100

Date: February 27, 1998

**CERTIFICATE OF SERVICE**

I, Ruth A. Buchanan, a secretary in the law office of Meyer, Faller, Weisman and Rosenberg, P.C. hereby certify that I have on this 27th day of February, 1998 caused to be hand delivered, a copy of the foregoing Reply to the following:

Daniel Phythyon, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554

Rosalind K. Allen, Deputy Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554

David Furth, Chief  
Commercial Wireless Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2100 M Street, N.W., 7th Floor, Room 24  
Washington, D.C. 20554

Ramona Melson, Chief,  
Policy and Rules Branch  
Commercial Wireless Division/WTB  
Federal Communications Commission  
2100 M Street, N.W., 7th Floor, Room 101A  
Washington, D.C. 20554

Terry L. Fishel, Chief\*  
Land Mobile Branch  
Division of Operations  
Wireless Telecommunications Bureau  
Federal Communications Commission  
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1111 19th Street, N.W., Suite 1200  
Washington, D.C. 20036

\*Via Federal Express

\*\*Via First Class Mail

  
Ruth A. Buchanan

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
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| In the Matter of                        | ) |                      |
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There is no need for the Bureau to make any findings whatsoever with regard to the Puerto Rico litigation. Rather, the Bureau may simply make its decision in this case based upon the one representation made for the rejustification extension, which is the allegation that business circumstances beyond TELECELLULAR’s control prevented its construction of even a single facility. The record clearly demonstrates that this is a dispute between the licensees, and who they want to construct their system, and is a matter which is entirely within their control.

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<sup>32</sup>Lukas, Nace’s January 7, 1998 Opposition discusses North Sight’s request that the Bureau review the participating licensee’s authorizations to determine whether there were violations of the “40 Mile Rule”. The Opposition compares the TELECELLULAR licenses to wide-area requests filed by Advanced MobileComm, Inc. (a subsidiary of Fidelity Ventures) and others. However, in the case of each of the referred to filings, the filing was made by an existing operator with existing, fully-loaded systems. As noted by TELECELLULAR itself, the creator of this venture, Pendleton Waugh, has a less than sterling record in the telecommunications area. The comparison of Pendleton Waugh to Fidelity Ventures is amusing, at best.

<sup>33</sup>See, Exhibit 23.

## II. CONCLUSION

In sum, the Bureau failed to properly review the applications filed by the licensees, as well as the Extended Implementation Request. The Bureau's determination that the lawsuit presented a circumstance for which relief could be granted was in error. Finally, the Bureau's determination that the lawsuit was beyond Telecellular's control was in error.

WHEREFORE, the premises considered, it is respectfully requested that the Bureau: (1) RECONSIDER its action of November 12, 1997; (2) INVESTIGATE the bona fides of the underlying licensees and of Telecellular; (3) REVOKE the licenses which do not meet the Commission's Rules with regard to former Section 90.627; (4) REVOKE the licenses which do not meet the Commission's standards for management agreements as recently reiterated in Marc Sobel, WT Docket No. 97-56, 97D-13, released November 28, 1997; and (5) TERMINATE the extended implementation authority granted to Telecellular.

Respectfully submitted,

NORTH SIGHT COMMUNICATIONS, INC.

By:   
Alan S. Tilles, Esquire

Its Attorney

Meyer, Faller, Weisman & Rosenberg, P.C.  
4400 Jenifer Street, N.W.  
Suite 380  
Washington, D.C. 20015  
(202) 362-1100

Date: February 27, 1998

**CERTIFICATE OF SERVICE**

I, Ruth A. Buchanan, a secretary in the law office of Meyer, Faller, Weisman and Rosenberg, P.C. hereby certify that I have on this 27th day of February, 1998 caused to be hand delivered, a copy of the foregoing Reply to the following:

Daniel Phythyon, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554

Rosalind K. Allen, Deputy Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554

David Furth, Chief  
Commercial Wireless Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2100 M Street, N.W., 7th Floor, Room 24  
Washington, D.C. 20554

Ramona Melson, Chief,  
Policy and Rules Branch  
Commercial Wireless Division/WTB  
Federal Communications Commission  
2100 M Street, N.W., 7th Floor, Room 101A  
Washington, D.C. 20554

Terry L. Fishel, Chief\*  
Land Mobile Branch  
Division of Operations  
Wireless Telecommunications Bureau  
Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

Elizabeth R. Sachs, Esquire\*\*  
Lukas, McGowan, Nace & Gutierrez  
1111 19th Street, N.W., Suite 1200  
Washington, D.C. 20036

\*Via Federal Express  
\*\*Via First Class Mail

  
Ruth A. Buchanan

EXHIBIT 1

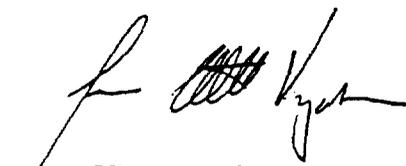
**Federal Communications Commission  
800 Megahertz Service  
Gettysburg PA 17326**

**Gentlemen:**

**Enclosed please find my completed 574 application for Ponce, Puerto Rico.**

**Should there be any questions, please contact my Engineer, Marie T. Cling, on (216) 656-5098.**

**Thank You,**



**Jose Vizcarrondo**

**Enclosure**

Federal Communications Commission  
Gettysburg, PA 17325-7245

# RADIO STATION LICENSE

Licensee Name: CARIBBEAN DIGITAL COMMUNICATIONS INC

Radio Service: YX TRUNKED SMRS

License Issue Date: 930924

Call Sign: WPDF780

File Number: 9303620955

License Expiration Date: 980924

Frequency Advisory No:

Number of Mobiles by Category: Vehicular - \*\*\*2\*\* Portable - \*\*\*2\*\* Aircraft - \*\*\*\*\* Marine - \*\*\*\*\* Pagers \*\*\*\*\*

930927N 357 1 1Z

CARIBBEAN DIGITAL COMMUNICATIONS INC  
TELECINCO INC JOSE VIZCARRONDO DIR  
BOX 9986  
SANTURCE PR 00908

## Station Technical Specifications

| FCC I.D.   | Frequencies (MHz) | Station Class | No. of Units | Emission Designator | Output Power (Watts) | E.R.P. (Watts) | Ground Eleva | Ant. Hgt. To Tip | Antenna Latitude | Antenna Longitude |       |
|--|-------------------|---------------|--------------|---------------------|----------------------|----------------|--------------|------------------|------------------|-------------------|-------|
| 1:   | 861.76250         | FB2C          | 1            | 20K0F3E             | 300.000              | 100.000        | 0            | 20               | 18-30-17         | 066-37-58         |       |
|  |                   |               |              |                     |                      |                |              | HAAT             | -69              |                   |       |
|  | 862.76250         | FB2C          | 1            | 20K0F3E             | 300.000              | 100.000        |              |                  |                  |                   |       |
|  | 863.76250         | FB2C          | 1            | 20K0F3E             | 300.000              | 100.000        |              |                  |                  |                   |       |
|  | 864.76250         | FB2C          | 1            | 20K0F3E             | 300.000              | 100.000        |              |                  |                  |                   |       |
|  | 865.76250         | FB2C          | 1            | 20K0F3E             | 300.000              | 100.000        |              |                  |                  |                   |       |
|  | 806.00000-MO      |               | 4            | 20K0F3E             | 100.000              | 100.000        |              |                  |                  |                   |       |
|  | 821.00000         |               |              |                     |                      |                |              |                  |                  |                   |       |
| TRANSMITTER STREET ADDRESS   |                   |               |              |                     |                      |                | CITY         |                  | COUNTY           |                   | STATE |
| 1: CALLE VILLA 832 ESQUINA CEMENTERIO  |                   |               |              |                     |                      |                | PONCE        |                  |                  |                   | PR    |
| AREA OF OPERATION  |                   |               |              |                     |                      |                |              |                  |                  |                   |       |
| SITE 1: 70 MIRA 18-30-17N 066-37-58W PONCE PR  |                   |               |              |                     |                      |                |              |                  |                  |                   |       |
| CONTROL POINTS: ASSOCIATED CONTROLS AND MOBILES OPERATING UNDER THIS AUTHORIZATION AND LICENSED TO USERS OF THIS SMR FACILITY. |                   |               |              |                     |                      |                |              |                  |                  |                   |       |
| CONTROL POINT PHONE: 809-721-4054  |                   |               |              |                     |                      |                |              |                  |                  |                   |       |
| SPECIAL COND: SEE ATTACHED #34   |                   |               |              |                     |                      |                |              |                  |                  |                   |       |
| STATION CLASS SUFFIX C = INTERCONNECT  |                   |               |              |                     |                      |                |              |                  |                  |                   |       |
| STATION CLASS SUFFIX J = TEMPORARY WITH INTERCONNECT   |                   |               |              |                     |                      |                |              |                  |                  |                   |       |
| STATION CLASS SUFFIX K = STAND-BY WITH INTERCONNECT  |                   |               |              |                     |                      |                |              |                  |                  |                   |       |
| STATION CLASS SUFFIX L = ITINERANT WITH INTERCONNECT   |                   |               |              |                     |                      |                |              |                  |                  |                   |       |
| EMISSION DESIGNATOR(S) CONVERTED TO CONFORM TO DESIGNATOR(S)<br>SET OUT IN PART 2 OF THE COMMISSION'S RULES.                   |                   |               |              |                     |                      |                |              |                  |                  |                   |       |

FEDERAL  
COMMUNICATIONS  
COMMISSION

This authorization becomes invalid and must be returned to the Commission if the stations are not placed in operation within eight months unless an extension of time has been granted. EXCEPTION: 800 MHz trunked and certain 800 MHz station licenses cancel automatically if not constructed within one year.

APPLICATION FOR PRIVATE MOBILE RADIO SERVICES

03-24-93 8235,150 010

PRIVATE MOBILE RADIO SERVICES

IMPORTANT NOTICE: ALL applicants MUST include the PI applications at the PROPER LOCATION. Refer to the current Branch Federal Communications Commission, Ge...

COMMISSION USE ONLY 620955 Page 1 of 1

Table with 12 columns: 1. Frequency (MHz), 2. Station Class, 3. No. of Units, 4. Emphasis Designator, 5. Output Power, 6. ERP, 7. Freq. Ch., 8. Ground Elevation, 9. Ant. Hgt. To Top, 10. Antenna Length, 11. Antenna Length, 12. Number of Mobiles By Category.

14. Station Address or Geographic Location, 15. City, 16. County, 17. St. (A) Calle Villa 832 Esquina Cementerio, Ponce, PR

18. Location of Primary Control point, 19. Freq. Advisory Comm. No., 20. Radio Service: YX, 21. Applicant/Company Name: Caribbean Dfg... Inc., 22. City: Santurce

24. Provide description of the structure on which your antenna is mounted and the height above ground to the top of the structure. Table with columns: No, Yes, Call Sign, Radio Service, Structure Type, Structure Height Above Ground, Aircraft Landing Area Name, Distance (Miles), Direction.

29. Has notice of construction or alteration been filed with the FAA? 30. Applicant Classification: Association, Corporation, Govt. Entity. 31. Eligibility (Describe Activity): Applicant proposes to provide, on a commercial basis, mobile relay facilities for use by FCC Part 90 eligibles.

32. Application is for (check one): New Station, Modification, Assignment, Reinstatement, Renewal. 33. Does application include the complete system? 34. Would a component part of your application be an action which may have a significant environmental effect... 35. Specification of item(s) modified, if applicable. 36. Other than new station, list call signs of existing stations to be modified, combined or reinstated. 37. Individual completing this application form(s): Marie T. Cling, Telephone No. 1 216 656-5098

FOR COORDINATOR USE ONLY: 38. Supplemental Information for Trunked and Conventional Systems 806-824/851-869 MHz and 890-901/935-940 MHz frequency bands. Indicate Type of Applicant: a) Independent, b) Commercial (SMRS entrepreneur), c) Community Repeater (Owner), d) SMRS user. Type of system: (Check One) a) Conventional, b) Trunked. Frequency Band Requested: (Check One) a) 806-824/851-869 MHz, b) 890-901/935-940 MHz. Signature: Jose Vizcarrondo, 809 721-4054

**Federal Communications Commission  
800 Megahertz Service  
Gettysburg PA 17326**

**Gentlemen:**

**Enclosed please find my completed 574 application for Ponce, Puerto Rico.**

**Should there be any questions, please contact my Engineer, Marie T. Cling, on (216) 656-5098.**

**Thank You,**

  
**David Aleman-Gonzalez**

**Enclosure**