



COMMUNICATIONS EVOLUTIONS

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MOTOROLA

Authorized Two-Way
Radio Dealer

July 10, 1998

Ms. Magalie Roman Salas
Secretary, FCC
Room 222
1919 M Street, NW
Washington, DC 20554

Subject: RM-9267, Concerning an Allocation of Spectrum for the private Mobile Radio Services

Dear Ms. Salas,

We respectfully submit these Reply Comments in regard to the above referenced and captioned Petition for Rule Making filed by the Land Mobile Communications Council (LMCC). Communications Evolutions has been in wireless communications business for twenty five years and the allocation of spectrum for the private mobile radio service is of great importance to us and to our customers we serve. Our company is located in McMinnville, Tennessee and our customer service area includes over eleven counties and several thousand customers. We are a small company which employs twelve people and contributes to our local economy near one million dollars in revenue each year. We are users of our own radio system which allows us to serve the wide area of our customer base more efficiently giving our customers better service at a affordable rate while allowing us to make a profit.

We wholeheartedly support the spectrum allocation objectives contained within the LMCC's Petition for Rule Making and the Council's request that a meaningful dialogue must commence among the telecommunications leadership regarding the state of the private wireless industry. Our business is built around the repair and service of customers wireless equipment. We service both shared private wireless systems and private system. The need for wireless communication to existing and future customers is very vital to their business operation and success for the future, as it is for our own. The lack of private wireless spectrum in the 150 MHz, 450 MHz, 800 MHz, and 900 MHz bands has affected our ability to meet the needs of our customer with their own radio systems, which causes a reduction in productivity and jeopardizes the safety of their employees, and the results hurts their profitability. A lot of the existing systems have already reach their capacity and it is not practical to impose more users onto a system which is already to busy. These same issues effect present and future business operation.

Recent national telecommunications policy has been directed at maximizing competition between commercial service providers through the exclusive use of spectrum auction procedures. While these are worthwhile objectives, they have come at the expense of the private wireless industry. Auction processes are misapplied in the shared spectrum environments that encompass virtually all private wireless radio system applications.

We, therefore, support the Industrial Telecommunications Association's proposal that the Commission should diligently seek Congressional authority to implement efficiency-based spectrum lease fees as a private wireless license assignment alternative to competitive bidding procedures. Lease fees would ensure that a portion of the spectrum's value is compensated and would significantly promote spectrum efficiency, a fundamental objective of the FCC. By providing lease fee license assignment we give the small business the opportunity to fulfill the needs of their private wireless operational needs in a way that commercial markets can't, which allows these customers to have a means to operate their business in ways which help them be more efficient, safety conscious, profitable and bring more revenue to our economy across the United States.

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We also share the views expressed by a number of commenters in this proceeding that commercial providers are not equipped to accommodate all of the communications requirements of private wireless entities. In many private wireless systems applications, the products, geographic coverage area and system integrity requirements simply cannot be satisfied through the communications services offered by commercial-oriented systems. Commercial systems such as cellular, PCS or others can't solve all of our needs. There are areas where these systems do not have coverage for and if they do have access to these system they may not be practical for the needs of the customer nor as reliable as private wireless communications. We see this everyday in our area of business. Our area of business is all considered to be rural territory. We have the commercial cellular and PCS in these areas as well, however, most of the customers we service could not do business using only these types of wireless services. They would not have the area of coverage they need nor would it be economically sound.

We appreciate the opportunity extended by the Commission to participate in this critical proceeding and request that the Commission expeditiously proceed to adopt a Notice of Proposed Rule Making consistent with the objectives of the LMCC's Petition for Rule Making.

Sincerely,

A handwritten signature in cursive script that reads "Regina Myers".

Regina Myers
Owner