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

In the Matter of)	
)	
Amendment of Part 95 of the Commission's)	WT Docket No. 98-169
Rules to Provide Regulatory Flexibility in the)	RM-8951
218-219 MHz Service)	
To: The Commission		

COMMENTS OF
IN-SYNC INTERACTIVE CORPORATION

Stephen E. Coran
Rini, Coran & Lancellotta, P.C.
1350 Connecticut Avenue, N.W.
Suite 900
Washington, D.C. 20036
(202) 296-2007

October 30, 1998

Its Attorneys

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Summary of Comments

In this proceeding, the Commission proposes changes to its 218-219 MHz service rules intended to provide licensees with relief from burdensome restrictions and flexibility to promote competition. In-Sync Interactive Corporation ("In-Sync"), holder of 25 218-219 MHz licenses, fully supports the Commission's well-reasoned initiatives, and suggests some refinements to the proposed rule changes to facilitate greater opportunities for licensees.

In-Sync favors the Commission's proposal to permit licensees to provide both private carrier and common carrier services, in recognition of the numerous fixed, mobile, interconnected services that already can be provided under existing rules. So that licensees to are not hindered with delays associated with processing carrier status changes, In-Sync proposes that 218-219 MHz licensees be able to change their carrier designation upon 30 days' notice to the Commission.

In-Sync believes that the proposed extension of the license term and installment payment schedule to ten years are critical to the success of the 218-219 MHz service. These changes would make it easier for licensees to attract much-needed investment capital on reasonable terms and also decrease each quarterly payment. The more favorable financial environment would, in turn, facilitate the more expeditious development of competitive services. As a further benefit, In-Sync proposes that the *entire* outstanding installment payment balance – including accrued principal and interest covered under pending grace period requests – be reamortized over the remainder of the ten-year license term.

In-Sync generally supports the amnesty plan suggested by the Commission, but favors granting licensees a limited opportunity to sell their licenses prior to their surrender. Under this plan, a buyer such as In-Sync could acquire a license and obtain a 35 percent or 25 percent

discount on remaining installment payments. The sale of these licenses would limit the number of re-auctions, allow for a smooth transition of licenses, provide financial incentives to legitimate purchasers and, ultimately, lead to more expeditious service to the public.

In-Sync agrees that the Commission should eliminate the construction benchmark rule and the restrictive license assignment rule for all 218-219 MHz licensees. Licensees also should be able to hold both licenses in a market, and partition markets and disaggregate spectrum as their business needs dictate. In addition, the Commission should abolish unnecessary technical standards and instead rely on the ability of licensees to carefully design and coordinate 218-219 MHz systems with each other and with Channel 13 stations.

Finally, In-Sync supports the Commission's proposal to apply the new Part 1 auction rules to future 218-219 MHz auctions. However, In-Sync urges the Commission to offer a further 15 percent discount to existing licensees that acquire additional licenses at auction.

With the modifications discussed in its Comments, In-Sync Interactive Corporation advocates expeditious adoption of the proposed new rules.

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**COMMENTS OF
IN-SYNC INTERACTIVE CORPORATION**

In-Sync Interactive Corporation ("In-Sync"), by counsel and pursuant to Section 1.415 of the Commission's Rules, hereby submits the following comments in response to the *Order, Memorandum Opinion and Order and Notice of Proposed Rulemaking*, FCC 98-228, released September 17, 1998 (the "*NPRM*").

Introduction

In-Sync is the parent corporation of 25 separate subsidiaries, each of which holds a 218-219 MHz license obtained by auction.¹ Collectively, the markets represented by these licenses include more than nine million people. In-Sync also has entered into contractual arrangements to acquire license interests including another 47 million people, and plans to further increase its holdings in the future through the auction process and by acquisition of other existing licenses. In-Sync's acquisition strategy targets licenses in MSAs and RSAs near its existing markets, as well as equity interests in some of the largest MSAs that were initially awarded by lottery.

¹ A list of the licenses and the respective subsidiary licensees is appended hereto.

Given the large number of permissible fixed and mobile uses and the propagation characteristics of the 218-219 MHz spectrum, In-Sync believes that it will soon be able to provide cost-effective wireless monitoring and metering services to utilities, transportation businesses and local governments. These services include network meter reading for electric, water and gas companies, management of traffic control systems, sales data communication and other similar services. In some of its markets, In-Sync may provide consumer services to individual subscribers. To help implement its business plan, In-Sync has entered into strategic relationships with financial institutions, technology developers and a major marketing partner.

Since the service was first authorized, In-Sync has participated in nearly every rule making proceeding affecting the 218-219 MHz service, and has invested substantial human and financial resources in the research, development and implementation of 218-219 MHz band services. In-Sync commends the Commission on the proposals and conclusions discussed in the *NPRM*, and wholeheartedly endorses the adoption of initiatives designed to grant licensees relief from financial payment burdens and to permit greater flexibility in developing competitive services. In-Sync firmly believes that these proposals, if expeditiously adopted with the additional refinements advanced by In-Sync herein, will position the 218-219 MHz service as a dynamic, competitive force in the communications marketplace.

Discussion

I. Licensees Should Be Permitted To Provide Both Private Carrier And Common Carrier Services.

In-Sync supports the Commission's proposal to permit 218-219 MHz licensees to be classified as both common carrier and private carrier services in recognition of the "wide array" of mobile and fixed services that licensees are able to provide.² Moreover, as the Commission recognizes, a common carrier 218-219 MHz licensee could provide one-way communications and RTU-to-RTU communications, and would be entitled to interconnect with PSN or CMRS providers.³ Licensees could not only compete with existing common carrier services, but could combine spectrum in strategic ventures with cellular, PCS, paging and other such services to provide additional capacity or enhanced services. The recent adoption of "dual carrier" rules for other services suggests that this flexibility is a growing trend in the regulation of communications services.⁴

In-Sync does not favor the process suggested by the Commission that would require licensees to "specifically identify" their intended service offerings in "sufficient detail."⁵ Although In-Sync recognizes the Commission's need to apply the appropriate carrier designation to each market, such disclosure could force licensees to reveal information that would damage

² *NPRM* at ¶ 33.

³ *Id.* at note 124.

⁴ *See, e.g., Second Report and Order, Order on Reconsideration, and Fifth Notice of Proposed Rulemaking*, 12 FCC Rcd 12545 (1997) (authorizing LMDS to provide both common carrier and private carrier services).

⁵ *NPRM* at ¶ 33.

their ability to compete. Licensees in other services could gain access to important information before a 218-219 MHz service launches, and take action that would thwart competition before it even begins. Where such a plethora of potential new 218-219 MHz services can be offered, such disclosure would be unfair and would, ironically, undermine the very policies the Commission is trying to promote.

Rather, In-Sync would require 218-219 MHz licensees to identify only whether they intend *primarily*⁶ to provide: (a) fixed or mobile services; (b) private or commercial services; and (c) interconnected or non-interconnected services. Licensees would make their initial carrier status election for each licensed market 90 days after new rules are adopted, and licensees could change status at any time on 30 days' notice to the Commission.⁷ Such flexibility would enable multi-market licensees to tailor their service offerings to the particular needs of a specific market, and to continuously refine their offerings in order to better respond to the ever-evolving marketplace without revealing their specific competitive plans. Administrative effectiveness also would be achieved, as Commission staff would not be burdened with application processing and would only be responsible for record-keeping in connection with regulatory fees and other such obligations.

⁶ Some licensees may desire to provide both private and common carrier services in the same market. Their status designation should not limit them to one or the other.

⁷ The Commission recently adopted rules permitting MDS and ITFS licensees to enjoy similar flexibility in alternating between carrier statuses on 30 days' notice. *See Report and Order*, FCC 98-231, released September 25, 1998, at ¶ 74.

II. The License Term Should Be Extended To Ten Years And Installment Payments Should Be Reamortized.

A. The License Term Should Be Extended From Five Years To Ten Years.

As a holder of 25 licenses with intentions to acquire additional interests, In-Sync strongly urges the Commission to adopt its proposal to amend Section 95.811(d) to lengthen the license period for all 218-219 MHz licenses to ten years.⁸ Most 218-219 MHz licensees, including In-Sync, are small, entrepreneurial businesses that need to attract and secure adequate financing on reasonable terms to develop viable services. With less than two years remaining on most initial license terms, investors are reluctant to invest on *any* terms (much less reasonable terms) because there is an insufficient amount of time to initiate service and obtain any return on their investment -- no credible business plan could show positive return in such a short period of time, especially in a new venture. Coupled with adoption of the Commission's proposals to eliminate the one-to-a-market rule and reamortize installment payments (discussed below), a longer license term is critical to assure investors that licenses will be held for a sufficient period to develop a viable plan, initiate meaningful services and generate revenues and cash flow.

Further, as noted in the *NPRM*, the current five-year license term for 218-219 MHz licenses is substantially shorter than the license term applicable to other auctioned services similar in technology and geographic boundaries. For example, licensees in the Multipoint Distribution Services, Point-to-Point Microwave Radio Services, Local Television Transmission Services and Digital Electronic Message Services all are granted for periods of ten years. In addition, common

⁸ See *NPRM* at ¶ 36. The longer license term should, of course, apply to existing license terms, and new licenses should be issued reflecting the ten-year term.

carrier licensees generally are awarded ten-year licenses. There is no logical reason for the Commission to continue to treat 218-219 MHz services differently.⁹

B. Installment Payments Should Be Reamortized Over The Remainder Of The Initial License Term.

In-Sync agrees that the Commission should reamortize installment payments over the balance of the extended ten-year license term. Reamortization of the installment payments would benefit 218-219 MHz licensees by spreading out the costs of the licenses and decreasing the amount of each installment payment, which will provide necessary relief from the financial burdens many licensees are experiencing.

However, in contrast to the Commission's proposal, In-Sync believes that the interest-only payments should be payable over *five* years, not the two years proposed in the *NPRM*. All licensees likely will be more than four years into their license term when new rules become effective, meaning that, in many cases, the amount of interest and accrued installment payments covered by grace periods due in the first payment following adoption of new rules would be substantial and disproportionate to the remaining payment amounts. This may force some licensees to surrender their licenses under the proposed amnesty program rather than retain and

⁹ In-Sync has entered into agreements to acquire non-controlling interests in some of the licenses in the nine markets where licenses were awarded by lottery. For several reasons, In-Sync urges the Commission to extend the license term for the eighteen licenses obtained by lottery. First, the IVDS service has been plagued with equipment distribution problems that has delayed initiation of commercial service in many of these markets. These problems have been greatest for the lottery-winners, which obtained their licenses more than a year before the auction-winners. Second, these licenses are for the nine most populous MSAs, where capital costs to deploy meaningful service are higher. With additional time under the initial license, there is a substantially greater likelihood that these markets can attract the necessary capital to initiate commercial service.

develop systems under a less burdensome payment plan.

Further, In-Sync asks that a licensee's entire outstanding balance be reamortized, including all then-accrued principal and interest payments, rather than requiring all such arrearages to be paid in the first payment following adoption of amended rules. In similar circumstances involving PCS installment payments, the Commission determined that a lump sum payment "could place a significant burden on licensees."¹⁰ The situation is no different here. Including the entire outstanding balance in the re-amortized payments would ease the payment burdens, freeing up needed capital for development purposes.

In-Sync also urges the Commission to offer additional financial incentives to those licensees that desire to make payment in full rather than continuing to make installment payments. In-Sync suggests that, upon reamortization, licensees be given the opportunity to choose whether to continue to pay in quarterly installments or pay the outstanding principal in a lump sum with the appropriate 35 percent or 25 percent bidding credit discussed in Section IX, *infra*. This approach would reduce many of the administrative burdens associated with installment payments -- collecting payments, processing grace period requests, procuring documentation from licensees, coordinating with other federal agencies -- in exchange for financial benefits that future licensees would enjoy if the new Part 1 rules are applied to the 218-219 MHz service.

¹⁰ *Second Report and Order and Further Notice of Proposed Rulemaking*, 12 FCC Rcd 16436, 16450 (1997).

III. The Commission Should Grant All Properly-Filed Grace Period Requests.

In-Sync strongly endorses the Commission's proposal to automatically grant all properly-filed grace period requests.¹¹ Licensees that obtained their licenses by auction would be able to retain their licenses and take full advantage of the rule amendments that the Commission will adopt. For instance, licensees would benefit from the debt re-structuring, the ten-year license term and the flexibility to provide common carrier services.

IV. Licensees Should Have The Option Of Surrendering Their Licenses.

In-Sync also agrees with the Commission that 218-219 MHz licensees should have the option of retaining their licenses or returning them to the Commission with amnesty for re-auction. However, In-Sync proposes that there be a 120-day period during which licensees contemplating license surrender may sell their licenses, with the assignee assuming the installment payment obligations at a discounted rate.

Under this plan, within 120 days following the effective date of rules adopted pursuant to the *NPRM*, for each license, the licensee must either: (a) submit a notice that it intends to retain the license; (b) surrender the license under the amnesty program; or (c) file an application to assign the license with the assignee obtaining either a 35 percent discount on remaining installments if it qualifies as a "very small business" or a 25 percent discount if it qualifies as a "small business," as defined in Part 1 of the Commission's Rules. This period should afford licensees a fair opportunity to make a reasoned decision and, in certain cases, negotiate purchase agreements and prepare assignment applications.

¹¹ *NPRM* at ¶ 38.

The assignment discount is intended to encourage licensees to take advantage of option (c). It ensures a smooth transition of licenses to qualified purchasers that want to expedite service to the public by providing them with financial incentives. Moreover, because some existing authorizations would be purchased, far fewer licenses would need to be re-auctioned, thereby reducing administrative burdens. Purchasers would have certainty in the license allocation process and certainty in knowing that they will have the benefit of more flexible rules, all of which will create a more stable financial and market development environment.

As a prospective purchaser of licenses, In-Sync believes that this process will provide greater opportunity to those committed to maximizing the benefits of the 218-219 MHz spectrum and create sufficient financial incentives and regulatory certainty. In-Sync urges the Commission to adopt this proposal.

V. The Three-Year And Five-Year Construction Benchmarks Should Be Eliminated In Favor Of A "Substantial Service" Showing.

In-Sync strongly believes that the construction benchmarks set forth in Section 95.833 should be eliminated for all licensees, as proposed in the *NPRM*.¹² The Commission's purpose in requiring construction benchmarks, which is to ensure that spectrum is not warehoused and is used to provide service to the public, cannot be applied in this situation because equipment and innovative uses for the 218-219 MHz band are still in the process of being developed. As the

¹² *Id.* at ¶ 44. As is the case with the ten-year license term, for the reasons discussed in note 9, *supra*, this proposal should apply equally to licensees that acquired their licenses by auction and those that acquired theirs by lottery. Moreover, by eliminating the benchmarks, the Commission would avoid the administrative burdens associated with processing and acting on requests for waiver of Section 95.833, an exercise it undertook in waiving the three-year benchmarks. *See Order*, 13 FCC Rcd 756 (1998).

Commission is aware, IVDS was conceived as an interactive television service. That was before the explosive growth of the Internet and other high-volume data services. As a narrowband service of only 500 kHz per license, IVDS has been unable to compete with broadband delivery systems such as fiber optics, and licensees instead have been forced to explore other potential uses unrelated to personal transactional or consumer data delivery applications. This transformation to services such as network monitoring and meter reading continues at all levels, including business planning, equipment manufacturing and technical design. Development of these new communications services is hindered when artificial time limits are placed on construction because resources are diverted from research and technology design needs towards arbitrary regulatory benchmarks.

If the Commission replaces the construction benchmark rule with a "substantial service" showing, In-Sync strongly believes that the showing should not be required until the end of the license term, as a condition of renewal. In-Sync further requests that "substantial service" be sufficiently and specifically defined to include services provided to businesses or industries that indirectly provide service to the public. As mentioned, In-Sync primarily plans to use the 218-219 MHz band to provide services to utilities, transportation companies and governmental traffic control agencies, not the subscribing public (although, in some markets, consumer services may be offered). The definition of "substantial service" should be sufficiently broad to include such services. Licensees developing such non-consumer services should not be penalized or risk losing their licenses because they do not fall within a narrow definition of "substantial service" that fails to include such services.

VI. The Restrictions On License Transferability Should Be Eliminated.

As discussed above, In-Sync is a prospective purchaser of 218-219 MHz licenses, including those in the nine markets where licenses were awarded by lottery. Under current Section 95.819(b), these licensees are prevented from assigning their licenses until after the five-year construction benchmark has been met.

In-Sync urges the Commission to eliminate this restriction. The greater flexibility that the adoption of new rules will create will increase opportunities in the 218-219 MHz service, which in turn should encourage investment in building out these important markets. For In-Sync, this means that it could acquire licenses in some of these markets, develop them efficiently as part of a regional cluster and increase its geographic footprint. Also, upon elimination of the one-to-a-market restriction, an existing licensee in these markets could acquire the other licensee's spectrum block, allowing twice the capacity to be developed. As discussed herein, the ability to cluster markets and aggregate spectrum are critical to the survival and growth of the 218-219 MHz service. In this regard, it would be illogical to have a rigid set of regulations apply to the nine most populous markets and have more flexible rules apply to the rest of the country.

VII. Licensees Should Be Able To Aggregate, Partition And Disaggregate Their Licenses.

In-Sync urges the Commission to permit licensees to aggregate, partition and disaggregate their licenses, as proposed in the *NPRM*.¹³ The Commission correctly recognizes that the evolution of the 218-219 MHz service from primarily interactive television to data delivery will place the 218-219 MHz service into direct competition with broadband services, such as fiber optic

¹³ *Id.* at ¶¶ 48-53.

cable, ADSL and two-way wireless cable, along with CMRS services such as PCS, cellular and paging. Many of these competitors enjoy not only a head-start in the marketplace, but also significantly more capacity than the 500 kHz now available to IVDS licensees. For those licensees planning to provide such services, this competitive gap will never be closed if the Commission does not abolish Section 95.813(b) and permit IVDS licensees to hold both the "A" and "B" licenses in the same market.

Of course, some business plans may require a lesser amount of spectrum, and a licensee may want to sell capacity to fund development. For example, a utility company may need only 100 kHz to monitor its meters, and could utilize funds from the sale of the remaining 400 kHz to fund construction and facilities acquisition. For these reasons, licensees should be able to disaggregate spectrum in any amount.

Partitioning, too, would allow licensees to more efficiently develop their systems. MSA and RSA boundaries often do not reflect actual economic areas. Some large MSAs could better be developed by sub-dividing them into smaller urban areas. Conversely, markets might best be developed by combining portions of multiple MSAs and/or RSAs. Suffice it to say, although MSAs and RSAs are appropriate for the administration of initial license allocation, these designations are arbitrary when it comes to maximizing spectrum value and providing competition. Allowing licenses to be partitioned will allow licensees to tailor their operations to "real world" market conditions.

VIII. The Commission Should Eliminate Unnecessary Technical Restrictions.

In-Sync believes that the Commission's existing 218-219 MHz technical standards are more restrictive than necessary to ensure interference protection to Channel 13 stations, and requests that these rules be stricken. Specifically, as further discussed herein, the Commission should eliminate: (a) the automatic power control restrictions in RTUs with power exceeding 100 milliwatts; (b) the CTS antenna height and power ratios; and (c) the duty cycle limitations. These modifications will facilitate the technical flexibility of the 218-219 MHz service, and are a vital component of the Commission's overall policy to create new competitive opportunities in the service.

With respect to the RTU automatic power control restrictions, In-Sync notes that this rule was adopted when IVDS was projected to be an interactive television service and RTUs would be co-located with television sets. As stated above, In-Sync does not propose this kind of service. Where the RTU would not be co-located near the television set, the automatic power control restrictions are not necessary to prevent interference to those receivers. Indeed, the Commission in the past has waived the restriction, citing the increased costs and complexity of automatic power control equipment and the evolving nature of the service.¹⁴

Likewise, the height and power limits are unnecessary to prevent harmful interference. As the Commission indicates, "other services are authorized to transmit in frequencies adjacent to or nearby 218-219 MHz with higher power levels than allowed at 218-219 MHz and no duty cycle restrictions, and . . . we have not received any complaints of interference to TV Channel 13

¹⁴ See *Order*, DA 98-972, released May 21, 1998.

from any of these operations."¹⁵ Further, 218-219 MHz licensees must, pursuant to Section 95.861(e), remedy harmful interference to television stations within 30 days of notification of the interference, or cease operations. In the unlikely event that there is interference, Section 95.861(e) provides appropriate interference protection without hindering 218-219 MHz licensees from providing service to the public. The rule also ensures that systems are designed and constructed carefully so that a licensee should *never* have to modify or cease operations

Finally, the Commission should extend its relaxation of the duty cycle rule to all markets. In general, Section 95.863(a) imposes a maximum duty cycle for each RTU of five seconds per hour or, alternatively, one percent of any 100 millisecond interval. Previously, the Commission modified the duty cycle rule, holding that the restriction does not apply to: (a) fixed and mobile transmissions where no TV Channel 13 predicted Grade B contour exists; and (b) fixed transmissions in MSAs where the 218-219 MHz service contour overlaps the TV Channel 13 predicted Grade B contour, and the 218-219 MHz transmissions are outside of the Grade B contour.¹⁶ In this proceeding, as noted above, the Commission notes that it has never received a complaint of interference to Channel 13 from adjacent frequencies where there is no duty cycle time limit.¹⁷ In light of this fact and the numerous areas the MSAs and RSAs remain subject to the rule, In-Sync urges the Commission to abolish Section 95.863(a) as an unnecessary artifice.

¹⁵ *NPRM* at ¶ 54 (footnote omitted).

¹⁶ *See Report and Order*, 11 FCC Rcd 6610 (1996).

¹⁷ *See* note 15, *supra*.

In considering whether to relax interference protection standards, the Commission should bear in mind that licensees design their systems to provide service to the public, and would not intentionally engineer a system that would cause interference, receive interference or lead to the potential disruption in service. In this vein, in authorizing two-way MDS and ITFS service, the Commission substantially streamlined its application process to allow expeditious licensing, but will not hesitate to compel service cessation in cases of impermissible interference.¹⁸ This "carrot and stick" approach to licensing and interference is intended to compel licensees to cooperate on system design *before* service is launched in order to ensure that services in the same or nearby markets can operate in harmony. The relationship between 218-219 MHz licensees and Channel 13 stations should be no different and, with the relaxation of technical standards and the retention of Section 95.861(e), there should be sufficient incentive for licensees in both services to work together on system design and interference abatement.

IX. The General Competitive Bidding Rules Should Be Tailored To The 218-219 MHz Service.

In-Sync believes that the competitive bidding procedures set forth in Part 1 of the Commission's Rules should govern future 218-219 MHz service auctions, with certain refinements. Specifically, In-Sync advocates bidding credits of 15 percent for bidders (and their affiliates) that already hold 218-219 MHz licenses. In light of the checkered history of the IVDS service, it can be expected that the pool of bidders for future auctions largely will be limited to existing licensees and CMRS providers seeking to aggregate spectrum or cluster. Comparing these classes, 218-219 MHz licensees are likely to be substantially less capitalized and thus not as able

¹⁸ See *Report and Order*, FCC 98-231, released September 25, 1998

to compete. By offering a bidding credit of 15 percent (in addition to the generally applicable bidding credits), the Commission would acknowledge this fact and reward those existing licensees that seek to integrate new markets into a business plan that, in any circumstances, faces competition from well-financed, established businesses.

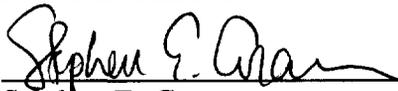
Finally, In-Sync supports application of the "small business" and "very small business" definitions proposed by the Commission as well as the higher 35 percent and 25 percent bidding credits set forth in Part 1. Such credits will allow In-Sync to devote more capital to market development, thereby expediting service to the public.

Conclusion

With the modifications and additional proposals discussed in these Comments, In-Sync endorses the Commission's efforts to provide 218-219 MHz licensees with financial relief, greater flexibility and more opportunities to provide competitive services. Without the expeditious adoption of these rules, it is unlikely that IVDS will ever become a viable service. The *NPRM* offers the last chance to give this service a new life, promise and success.

Respectfully submitted,

IN-SYNC INTERACTIVE CORPORATION

By: 
Stephen E. Coran

Rini, Coran & Lancellotta, P.C.
1350 Connecticut Avenue, N.W., Suite 900
Washington, D.C. 20036
(202) 296-2007

Its Attorneys

October 30, 1998
m:\jmasters\1998\ivds.com

List of In-Sync Licenses

	MSA License #	FCC Call Sign #	IVDS License Currently Held By ISIC Subsidiary	IVDS License Formerly Held By
1	IVM 268A	KIVD 0463	In-Sync Interactive/Billings, Inc.	Remote Vision Interactive, Inc.*
2	IVM 052A	KIVD 0056	In-Sync Interactive/Akron, Inc.	Remote Vision Interactive, Inc.*
3	IVM 141A	KIVD 0292	In-Sync Interactive/Duluth, Inc.	Remote Vision Interactive, Inc.*
4	IVM 142B	KIVD 0097	In-Sync Interactive/Modesto, Inc.	On-Screen USA Interactive Partners, Inc.*
5	IVM 178A	KIVD 0335	In-Sync Interactive/Wheeling, Inc.	On-Screen USA Interactive Partners, Inc.*
6	IVM 189A	KIVD 0121	In-Sync Interactive/Racine, Inc.	On-Screen USA Interactive Partners, Inc.*
7	IVM 191B	KIVD 0353	In-Sync Interactive/Yakima, Inc.	Premier Interactive, Inc.*
8	IVM 126B	KIVD 0274	In-Sync Interactive/Monterey, Inc.	Premier Interactive, Inc.*
9	IVM 157B	KIVD 0309	In-Sync Interactive/Roanoke, Inc.	Premier Interactive, Inc.*
10	IVM 087A	KIVD 0078	In-Sync Interactive/Canton, Inc.	American Interactive East, Inc.*
11	IVM 183B	KIVD 0119	In-Sync Interactive/Asheville, Inc.	American Interactive East, Inc.*
12	IVM 082B	KIVD 0077	In-Sync Interactive/Tacoma, Inc.	American Interactive West, Inc.*
13	IVM 050B	KIVD 0185	In-Sync Interactive/Honolulu, Inc.	American Interactive West, Inc.*
14	IVM 146A	KIVD 0102	In-Sync Interactive/Daytona Beach, Inc.	America 52 East, Inc.*
15	IVM 117A	KIVD 0264	In-Sync Interactive/Colorado Springs, Inc.	America 52 West, Inc.*
16	IVM 198A	KIVD 0123	In-Sync Interactive/St. Cloud, Inc.	America 52 West, Inc.*
17	IVM 210A	KIVD 0128	In-Sync Interactive/Fort Collins, Inc.	America 52 West, Inc.*
18	IVM 214B	KIVD 0381	In-Sync Interactive/Richland, Inc.	America 52 West, Inc.*
19	IVM 241A	KIVD 0420	In-Sync Interactive/Pueblo, Inc.	America 52 West, Inc.*
20	IVM 140B	KIVD 0291	In-Sync Interactive/Charleston, Inc.	Kent D. Moss, D.D.S.
21	IVM 020B	KIVD 0028	In-Sync Interactive/Seattle, Inc.	Washington Communications, Inc. (Vivid Networks, Inc.)
22	IVM 270B	KIVD 0150	In-Sync Interactive/Bellingham, Inc.	Washington Communications, Inc. (Vivid Networks, Inc.)
23	IVM 229B	KIVD 0404	In-Sync Interactive/Medford, Inc.	Cyrus K. Dam Survivors Trust
24	IVM 274A	KIVD 0155	In-Sync Interactive/Yuba City, Inc.	Cyrus K. Dam Survivors Trust
25	IVM 285A	KIVD 0481	In-Sync Interactive/Las Cruces, Inc.	Cyrus K. Dam Survivors Trust