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November 9, 1998

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
TW-A325
445 Twelfth Street, S.W.
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Community Teleplay, Inc.
Comments
WT Docket No. 98-169

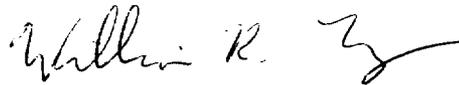
WT 95-47

Dear Ms. Salas:

Enclosed herewith on behalf of Community Teleplay, Inc. for association with its previously filed comments in the referenced docket, are an original and four copies of a Table of Contents and Summary which were inadvertently omitted from the comments as filed.

Please date stamp the enclosed file copy and return it to the courier for delivery to our office. If you have any questions, please telephone me at (202) 898-5706.

Very truly yours,



William R. Layton

Enclosures

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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)	
)	
Amendment of Part 95 of the Commission's)	WT Docket No. 95-47
Rules to Allow Interactive Video and Data)	RM-8476
Service Licensees to Provide Mobile Services)	(proceeding terminated)

NOV - 9 1998

COMMENTS OF COMMUNITY TELEPLAY, INC.

Submitted by:

COMMUNITY TELEPLAY, INC.

Myers Keller
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October 30, 1998

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SUMMARY

Community Teleplay, Inc. ("CTI") is the Segment B licensee in the 218-219 MHz service for the Norfolk-Virginia Beach MSA and acquired its license at the FCC-conducted auction in 1994. CTI believes that the Commission should adopt rules that provide strong incentives for licensees to commit resources to the development of the 218-219 MHz spectrum.

CTI thus proposes that the five-year construction benchmark remain in place for licensees that acquired their licenses via lottery, and a five-year renewal of such licenses should be granted only after the benchmarks based on "substantial service" are met. Further, CTI recommends that the Commission revise certain technical rules for improvement of the 218-219 MHz service. Specifically, mobile RTU's should be allowed to operate at up to 1 watt, the five second duty cycle should be eliminated, and the Commission's automatic power control requirement should be retained because -- as CTI shows -- no harmful interference will be caused to Channel 13.

Finally, CTI suggests that the Commission should, contemporaneously with this rulemaking, resolve pending cases concerning: (i) 25% refunds to the "non-preferred" class of auction winners that did not receive race/gender preferences in the 1994 auction; and (ii) the ability of 1994 auction winners to submit grace period requests.