



Wireless Market Source

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Amy Zoslov, Chief
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Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW Room 5202
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RECEIVED

JAN 20 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: PR Docket No. 93-61

Dear Ms. Zoslov:

Wireless Market Source (WMS), a potential participant in the Location and Monitoring Service (LMS) auction, wishes to respond to the Federal Communications Commission (FCC) Public Notice dated January 13, 1999. In the Notice, the FCC has asked for comment on the small business size definitions the FCC adopted for the LMS auction. It has done so because the Small Business Administration (SBA) has advised the FCC that the the SBA cannot approve those definitions until a record is developed on the size limitations actually adopted. These comments are requested only days before parties interested in providing LMS services must file their initial applications to participate in the auction, at which time they must advise the FCC if they intend to claim small business status. Therefore, it is vital that the FCC resolve this matter as promptly as possible.

WMS supports the small business definitions adopted for LMS: three-year averaged annual gross revenues of \$3M and \$15M respectively for very small and small businesses. They are consistent with those adopted or proposed for services such as paging, 220 MHz, 900 MHz SMR, 800 MHz SMR and VHF Public Coast, all of which have capital requirements comparable to those anticipated for the LMS service. Unlike the consumer-oriented cellular, PCS and ESMR systems which require substantial, highly sophisticated infrastructure providing extensive geographic coverage, these businesses tend to operate less complex, higher-site/higher-power facilities covering defined geographic areas. LMS customers are likely to be commercial or governmental enterprises that intend to use this capability to enhance the efficiency of their primary businesses within predetermined areas of operation. Thus, the service can be developed on a more incremental basis, with growth fueled by revenues generated. Because LMS is not expected to require the very substantial initial outlays needed to implement a cellular or PCS system, the size limitations adopted are reasonable and should encourage the participation of qualified small businesses in the LMS auction and the LMS industry.

WMS urges the SBA to approve the already-adopted LMS small business size definitions as well-suited to promote small business participation in the provision of this service, and to do so promptly so that the LMS auction can proceed unimpeded.

Respectfully submitted,
Wireless Market Source


LeRoy Kirchner

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