

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

In the Matter of)	
)	
Promotion of Competitive Networks)	WT Docket No. 99-217
in Local Telecommunications)	
)	
Wireless Communications Association)	
International, Inc. Petition for Rulemaking)	
To Amend Section 1.4000 of the)	
Commission's Rules to Preempt)	
Restrictions on Subscriber Premises)	
Reception or Transmission Antennas)	
Designed to Provide Fixed Wireless)	
Services)	
)	
Cellular Telecommunications Industry)	
Association Petition for Rulemaking and)	
Amendment of the Commission's Rules)	
To Preempt State and Local Imposition of)	
Discriminatory and/or Excessive Taxes)	
And Assessments)	
)	
Implementation of the Local Competition)	CC Docket No. 96-98
Provisions in the Telecommunications)	
Act of 1996)	

**DECLARATION OF CATHY L. YOVANOV IN SUPPORT OF JOINT COMMENTS OF
BUILDING OWNERS AND MANAGERS ASSOCIATION INTERNATIONAL;
INSTITUTE OF REAL ESTATE MANAGEMENT; INTERNATIONAL COUNCIL OF
SHOPPING CENTERS; MANUFACTURED HOUSING INSTITUTE; NATIONAL
APARTMENT ASSOCIATION; NATIONAL ASSOCIATION OF HOME BUILDERS;
NATIONAL ASSOCIATION OF INDUSTRIAL AND OFFICE PROPERTIES;
NATIONAL ASSOCIATION OF REALTORS; NATIONAL ASSOCIATION OF REAL
ESTATE INVESTMENT TRUSTS; NATIONAL MULTI HOUSING COUNCIL AND
NATIONAL REALTY COMMITTEE**

I, Cathy L. Yovanov declare as follows:

1. I submit this Declaration in support of the Joint Comments of the Building Owners and Managers Association International; Institute of Real Estate Management; International Council of Shopping Centers; Manufactured Housing Institute; National Apartment Association; National Association of Home Builders; National Association of Industrial and Office Properties; National Association of Realtors; National Association of Real Estate Investment Trusts; National Multi Housing Council and National Realty Committee. I am fully competent to testify to the facts set forth herein, and if called as witness, would testify to them.
2. I have worked in the property management industry since 1983 as an on site representative of building owners. I have close contact with tenants concerning their communication needs as they relate to the building as well as those of telecommunication companies who are attempting to provide a service to tenants.
3. Market Post Tower, Inc. owns and operates 55 South Market Street, San Jose, California. "The Gold Building," as it is sometimes referred to, houses not only office tenants but several telecommunications companies as well. Our staff in that building is the landlord to average tenants and also to the Internet hub known as "MAE WEST."
4. As commercial building owners, our philosophy has been the more service providers you can offer tenants the fewer reasons they will have to leave the building at renewal. In keeping with this philosophy we have always been receptive to any and all who ask for a building entrance agreement. To date we have negotiated and completed nearly eight access agreements with telecommunications providers.
5. In the course of dealing with telecommunications providers and access to our building, I have discovered two very important things: first, that the building does not have unlimited areas for conduit from the first floor to the roof ; and second, that telecommunications providers often fail to take into consideration the rights and needs of other tenants in our building.
6. During the negotiation process, representatives of telecommunications providers almost always assure us of the quality of their service and that they will cause little or no disruption to existing tenants. However, in my experience, those who actually install the cable needed to provide access to a potential client, usually subcontractors, generally do not respect the needs of existing clients. For example these subcontractors tend to show little, if any, concern for the tenants being interrupted during their workday by the drilling or coring or pounding of fasteners going through the building's telephone closets (all 16 floors). A simple solution for this problem would be to have the contractors work during off hours. However, telecommunications providers, due to the additional costs of overtime, generally refuse to require these contractors to do so.
7. Telecommunications providers seeking access to our building also often fail to recognize that the building owner has entered into other leases prior to the completion of their entrance agreement. Some of these earlier agreements, for security reasons, call for limited access to telephone closets in space occupied by a full floor tenant. This means that access to those telephone closets, especially after hours, is limited. In many cases, full floor tenants negotiate the right to use the telephone closet for some of their own equipment. This means

that while the building may have 24-hour security, someone must pay security to be present during the entire installation, including after-hours work and that the telecom provider cannot and will not be granted access on demand.

8. In our haste to provide our tenants with as many choices as possible, we failed to take in to consideration that the building has limited areas for conduit from the first floor to the roof. In our building these are now full. The structural engineer employed by Market Post Tower has informed us that coring even one more 2-inch hole in the building telephone closet would compromise the structural integrity of the building.
9. When we discovered that the conduits in our building were full we began to refuse to renew access agreements with those telecommunications providers who had no clients in the building. At this point, one company refused to remove its equipment from the riser conduit even though it had no roof top equipment to make it functional and had in fact never installed anything on the roof because the company never had a client in the building. They did not install the conduit or provide anything except the fiber we are now asking them to remove. A telecommunications providers acting in this way could actually prevent another provider that does have a service contract with a tenant from providing the service.
10. In addition, even "wireless" companies need access to riser space from their antennas on the roof to the tenant's suite. To allow further core drilling for conduit would risk the safety of the entire building. Since we cannot allow more cores to be made without compromising the structural integrity of the building, our position is that the next telecommunications provider that seeks access to our building in order to add cable will be permitted to do so only if it can do so without any making any more cores.
11. If building owners are forced to provide access, it is likely that those expenses that the landlord incurs for providing access to telecommunications providers will become common area expense and be passed on to all tenants, even if the tenant does not use that telecommunications provider. For example, in our building the current estimate for structural upgrades to allow coring is approximately \$150,000.00. We think it is unfair to pass all of these costs on to the tenants, when any additional service provider would only serve a limited number of tenants.

Verification

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief, and that this declaration was executed on August 2, 1999, in San Jose, CA


Cathy Yovanov

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**DECLARATION OF JAMES SYLVESTER IN SUPPORT OF JOINT COMMENTS OF
BUILDING OWNERS AND MANAGERS ASSOCIATION INTERNATIONAL;
INSTITUTE OF REAL ESTATE MANAGEMENT; INTERNATIONAL COUNCIL OF
SHOPPING CENTERS; MANUFACTURED HOUSING INSTITUTE; NATIONAL
APARTMENT ASSOCIATION; NATIONAL ASSOCIATION OF HOME BUILDERS;
NATIONAL ASSOCIATION OF INDUSTRIAL AND OFFICE PROPERTIES;
NATIONAL ASSOCIATION OF REALTORS; NATIONAL ASSOCIATION OF REAL
ESTATE INVESTMENT TRUSTS; NATIONAL MULTI HOUSING COUNCIL AND
NATIONAL REALTY COMMITTEE**

I, James S. Sylvester, declare as follows:

1. I submit this Declaration in support of the Joint Comments of the Building Owners and Managers Association International; Institute of Real Estate Management; International Council of Shopping Centers; Manufactured Housing Institute; National Apartment Association; National Association of Home Builders; National Association of Industrial and Office Properties; National Association of Realtors; National Association of Real Estate Investment Trusts; National Multi Housing Council; and National Realty Committee. I am fully competent to testify to the facts set forth herein, and if called as witness, would testify to them.
2. My career spans over twenty-five years with the U.S. Army, where I specialized in mobile communications systems operations and installations. I have extensive experience worldwide in secure technical voice and data communications, including state-of-the-art satellite, mobile radio, data transmission, landline, and broadcast systems for land, air, and marine applications. I currently am employed as a Wireless Engineer at Riser Management Systems, L.P. I assist commercial and residential property owners with a wide range of issues related to wireless communications installations in their buildings. I negotiate antenna site agreements and research and analyze sites and systems for satellite, wireless CLEC, paging, PCS, cellular, tenant VSAT,¹ and other rooftop installations.
3. Riser Management Systems, L.P. is a telecommunications design, engineering, management, and consulting firm based in Burlington, Vermont. Riser serves the real estate industry exclusively, assisting building owners in understanding and working within a competitive telecommunications environment to increase their tenants' access to and choice of sophisticated services. Since its founding in 1993, Riser has conducted infrastructure surveys

¹ Very Small Aperture Terminal.

of over two hundred commercial office buildings throughout the United States and Canada, physically examining, documenting, analyzing, and reporting on the conditions of telecommunications spaces, pathways, and cables. In addition, Riser has reviewed, negotiated, or drafted over one thousand lease and license agreements defining rights and obligations of access for telecommunications service, including wireless or rooftop use.

4. Rooftops of large buildings are multiple-use zones that normally support a variety of operating systems. These systems often include elements of the building's heating, ventilation, and air conditioning (HVAC) equipment, window washing facilities, and other tenant amenities such as sun decks, observation decks, gardens, and swimming pools. Wireless telecommunications systems use rooftops to access subscribers that are located either inside the building (e.g. a building tenant installation such as a satellite TV dish for its own use, or a commercial telecommunications service provider (TSP) such as a wireless CLEC), outside the building (e.g. paging or cellular providers) or some combination of both.
5. Building owners must consider that wireless telecommunications installations can and do impact a building in many ways. First, space available for such installations at a building is finite and must be managed carefully in order to accommodate a variety of systems and purposes. Each installation at a minimum consists of an antenna, coaxial cable, and a cabinet that houses a transceiver. Second, each transmitting antenna contributes to the overall radio frequency (RF) maximum permissible exposure (MPE) limit for humans at a particular site. (These limits are discussed in detail in the FCC's OET Bulletin 65.) Third, informed building owners seek to maximize use and services available at a given site by carefully managing the amount of building space allocated to each installation, monitoring the frequency and RF emission status, and avoiding co-interference issues by varying the types

and proximity of individual installations on the rooftop to maintain a healthy RF environment. Many wireless systems require that multiple coaxial cables pass through the building's inside pathways and connect to the main distribution frame for further distribution to its target audience. Many systems require multiple cabinets to contain transceivers, battery back-up power, and other network interface devices. All of these things intrude upon a building's limited rooftop and interior spaces. Therefore, building owners seeking to provide telecommunications choices to their tenants, maintain a healthy and diverse RF environment, and plan for future system integrations must carefully consider the impact of each wireless installation. Good rooftop management requires that the owner maintain a high degree of control over activities at the site. The tenants are the core business of a building and tenant needs are a priority, particularly in a case where a tenant occupies a large portion of the building.

6. Typically, a wireless CLEC installation to serve tenants in a building (not a hub or nodal site) will request approximately 40-50 square feet of floor space inside the building for use as an equipment space and an additional 25 square feet of space on the rooftop for the installation of its antennas and associated equipment. We examined some typical buildings to ascertain a theoretical percentage of rooftop space that would be available for antennas after accounting for space occupied by a building's mechanical systems. In a perfect world, we found that about 68% of the rooftop space could be available for antenna placement. This perfect world did not account for losses of suitable antenna space caused by obstructions that often surround a rooftop such as other buildings and terrain. In cities, generally about half of the available space on a given rooftop is unsuitable for use due to obstructions in close

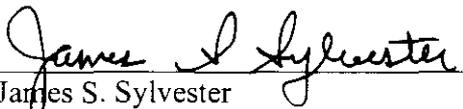
proximity. If two wireless CLECs have installations at a building, 80-100 square feet of floor space for equipment and 50 square feet of rooftop space will be required.

7. Wireless CLEC installations normally require equipment components to be placed in the basement areas and in upper floor mechanical rooms. These rooms have limited space because they are usually well populated with equipment necessary for the operation of the building. Furthermore, most buildings do not have large amounts of space set aside for telecommunications installations. This is because the boom in telecommunications choice occurred primarily after most buildings were designed and built. Many were originally designed to accommodate only "the phone company," not to accommodate modern telecommunications services such as CLECs, ISPs, cellular, and PCS installations. Particularly impacted by these developments are the building's telecommunications pathways, rooftops, and mechanical/storage spaces. Given the design of many buildings and the impact of obstructions, use of even 50 square feet (a 10 ft. x 5 ft. area) on a rooftop or inside a storage room is very significant. A building owner must balance the needs of the building's tenants with the present and future overall function and operation of the building, and ensure that all of this makes good business sense. Control of the limited spaces of the building is a critical issue for building owners.
8. Today, building owners are faced with a growing demand by wireless CLECs that all such CLECs be given the right to access a building's rooftop (and accordingly, its tenants) in order to compete with each other. If such a right were granted, it would open a floodgate to not only CLECs but also to other types of providers demanding access now and in the future. The result of this would be a complete loss of control by the building owner over the building's most precious commodity: its space. Such installations often have far reaching

impact and intrusion on a building beyond the rooftop. Additionally, a building owner normally carefully reviews a tenant's ability to perform their obligations to the building in terms of financials, ability to conform to building standards, and so forth. The informed building owner currently is able to assess the need for a particular telecommunications system, weigh its advantages and disadvantages, and determine if it is a "good fit" for the building. Given the plethora of start-ups and services offered (or not offered) by many TSPs today, it is difficult to imagine that buildings should have to allow access to a TSP merely because it exists.

9. Verification

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief, and that this declaration was executed on the twenty-fourth day of August, nineteen hundred ninety-nine, in Burlington, Vermont.


James S. Sylvester



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**DECLARATION OF LAWRENCE G. PERRY IN SUPPORT OF JOINT COMMENTS
OF BUILDING OWNERS AND MANAGERS ASSOCIATION INTERNATIONAL;
INSTITUTE OF REAL ESTATE MANAGEMENT; INTERNATIONAL COUNCIL OF
SHOPPING CENTERS; MANUFACTURED HOUSING INSTITUTE; NATIONAL
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NATIONAL ASSOCIATION OF INDUSTRIAL AND OFFICE PROPERTIES;
NATIONAL ASSOCIATION OF REAL ESTATE INVESTMENT TRUSTS; NATIONAL
ASSOCIATION OF REALTORS; NATIONAL MULTI HOUSING COUNCIL AND
NATIONAL REALTY COMMITTEE**

I, Lawrence G. Perry, AIA, declare as follows:

1. I submit this Declaration in support of the Joint Comments of the Building Owners and Managers Association International; Institute of Real Estate Management; International Council of Shopping Centers; Manufactured Housing Institute; National Apartment Association; National Association of Home Builders; National Association of Industrial and Office Properties; National Association of Real Estate Investment Trusts; National Association of Realtors; National Multi Housing Council; and National Realty Committee. I am fully competent to testify to the facts set forth herein, and if called as witness, would testify to them.

2. I am a registered architect, specializing in the development of national building codes and standards. As the National Codes Representative for BOMA, I have actively participated in the code development process of the three model code organizations since 1991: Building Officials and Code Administrators, International (BOCA National Codes); International Conference of Building Officials (ICBO Uniform Codes); and Southern Building Code Congress International (SBCCI Standard Codes). Since 1994, when these three organizations formed the International Codes Code Council (ICC), with the goal of developing a single set of model codes, I have been actively involved in the drafting and development of the International Building Code (IBC) and the International Fire Code (IFC), including serving on the Code Development Committees for the IFC in 1998 and the Means of Egress Committee for the IBC in 1999. Since 1998, I have served as the vice chair of the ICC Industry Advisory Committee. I am a member of the International Fire Code Institute and the National Fire Protection Association, where I serve on the Mercantile and Business Occupancy

I, Lawrence G. Perry, AIA, declare as follows:

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Subcommittee and the Technical Correlating Committee for NFPA 101, The Life Safety Code. I have served on several task groups to assist in the development of NFPA 101B, the Means of Egress Code, and am an active member of several other standards writing committees. In 1995, I earned a Certified Building Official designation from the Council of American Building Officials. I have a total of fifteen years of architectural experience, and have operated my own consulting business since 1991.

3. Building and fire codes require that certain building assemblies, including walls, floors, and shafts, provide specified levels of fire resistance based on a variety of factors, including type of construction, occupancy classification (e.g., business or assembly), and building height and area. In addition, fire-resistance rated assemblies are also required to separate areas of greater hazard (such as storage rooms) and critical portions of the egress system (such as exit access corridors and exit stairways). The required level of fire-resistance rating typically ranges between twenty minutes and four hours, depending on the specific application. An assembly used as a fire-resistance assembly must be tested and shown to be capable of resisting the passage of floor and smoke for the specified time.

4. Over the past ten years, a great deal of attention has been focused on the penetrations of fire-resistance rated assemblies, as these breaches have been shown to be a frequent contributor to smoke and fire spread during incidents. Fire-resistance rated assemblies are routinely penetrated by a wide variety of materials, such as pipes, conduits, cables, wires, and ducts. An entire industry has been built around the wide variety of approaches that must be used to maintain the required rating at a penetration. It is not a simple issue of just filling up the hole -- the level of fire resistance required, the type of materials the assembly is

constructed of, the specific size and type of material penetrating the assembly, and the size of the space between the penetrating item and the assembly each factor into determining the appropriate fire stopping method.

5. A new issue being raised in some local jurisdictions and in model codes and standards is the type and quantity of cable that is being installed in modern buildings, particularly above suspended ceilings, which in office buildings frequently serve as the return air plenum for the HVAC system. The primary concern being raised is the potential for cable to contribute to a fire, either as a fuel load, or as a source of toxic smoke. Issues being considered are requirements to remove any “abandoned” or unused cable, or to require that in some cases, any new cable be installed in metal conduit.

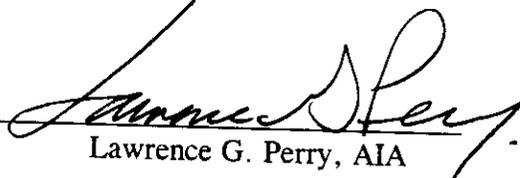
6. Forced building entry would grant persons unfamiliar with a building the authority to significantly compromise the integrity of fire-resistance rated assemblies. Persons unfamiliar with the specific construction of a particular building would be unable to accurately assess the types of assemblies they were penetrating, would be unable to determine the appropriate hourly rating, and would therefore be unable to provide the appropriate firestopping system. Further, it is unlikely that a person punching holes and pulling cables would even consider patching the holes after they pulled their cables through. Many of these penetrations would be made above suspended ceilings or in equipment rooms where there is little or no aesthetic concern.

7. Maintaining the integrity of fire-resistance rated assemblies is currently a challenge for building managers, due to the spectrum of trades that may be working in a building. Building operators can manage this problem by restricting access to qualified

companies, and can seek recourse, by withholding payment or denying future access, if the work is not done correctly. If building operators were forced to allow unlimited access to alternative service providers, the level of building fire safety could be significantly jeopardized. It is essential that building owners and managers be able to ensure that those personnel performing work in a building do so in a manner that does not compromise other essential systems, including fire protection features. Therefore, building owners and managers must have the right to determine who is permitted to perform work on their property.

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief, and that this declaration was executed on Aug. 20, 1999, at Washington, D.C.


Lawrence G. Perry, AIA

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 Dallas Business Journal



March 29, 1999

Allied Riser: wired for success

The firm's unique, high-speed data-services play is attracting investors, including billionaire property tycoon Sam Zell

Jeff Bounds Staff Writer

DOWNTOWN DALLAS -- With more than \$65 million in venture financing and ties to Chicago real estate magnate Sam Zell, a Dallas company is trying to revolutionize the way high-speed Internet and data services are delivered to office buildings.

Allied Riser Communications Inc. aims to build infrastructure for lightning-quick data transmission in office buildings with 200,000 square feet or more in the nation's 25 biggest markets.

It then sells a variety of inexpensive services to small- and medium-sized companies in those buildings. Among them: Internet access, video delivered to desktop computers and voice conferencing.

In exchange for letting Allied set up its fiber-optic systems in their buildings, landlords get a slice of Allied's revenue.

Allied's approach is the polar opposite of most telecom- and data-services providers, who typically build billion-dollar networks that crisscross the country or run in rings around cities. They generally then lease time from carriers like Southwestern Bell Telephone Corp. to connect their networks over the "last mile" of wires to customers.

Allied builds its fiber-optic cable where the customer is, and leases time on outside networks to transmit the data where it needs to go. While margins for leasing time aren't as high

as running service over a company-owned network, Allied contends the exploding number of providers means the leased time can be acquired at reasonable rates.

Company officials say the approach means they can offer services to small firms that only the big boys could afford until now -- and profitably at that.

The approach has won the support of several prominent investors who've poured in \$66 million in equity financing so far. Among them is Equity Group Investments, a Chicago venture firm controlled by Zell.

Zell, who's worth an estimated \$1.6 billion, built a national real estate empire by forming real estate investment trusts. Zell's REITs buy shabby properties on the cheap, fix them up and raise the rents.

The backing of Zell's Equity Group, which also provided a loan that helped Allied get off the ground, attracted support in turn from three other venture capital companies.

They are:

- Norwest Venture Capital, a California company whose early-stage investments include software maker PeopleSoft Inc. and Internet-access provider Verio Inc.;
- California-based Crescendo Ventures, which backed telecom-gear maker Ciena Inc. and software maker Oracle Corp.; and
- Telecom Partners II L.P. of Denver, which also helped fund Verio.

Allied's "strategy was dead-on with where we think the world is going -- very high-speed connections to the desktop," said Stephen Schovee, partner at Telecom Partners and Allied's board chairman.

Allied's president and chief executive, David Crawford, said the idea for the nearly 2-year-old company came from Zell himself.

At the time, Crawford was first general counsel at Chicago-based Equity Office Properties Trust, a Zell-chaired REIT that is America's largest publicly traded owner and operator of office properties.

"In the last seven years in the real estate business, I got involved in regulatory and other issues" stemming from the explosion of telecommunications providers, which all wanted access to Equity buildings, Crawford said.

For landlords, granting such access has traditionally been a headache. But analysts say many building owners these days are looking for additional revenue sources, offering services like dry cleaning both to bring in more money and to keep tenants happy.

In addition, the availability of high-speed data services means one more selling point to potential tenants.

Zell smelled a business opportunity, and tapped Crawford to explore it.

Crawford got together with a colleague, Jim Breen, and linked up with Todd Doshier, then a Dallas investment banker, now Allied's chief financial officer.

Doshier next rounded up several former engineers from MFS Communications Co., which was the first competitor to the Bell telephone companies. More recent additions include vice president of engineering Tom Guthrie, formerly of MCI Communications, and vice president of sales Ted Gilmore, who comes from GTE Corp.

That blend of real estate, technology and financial expertise could prove valuable on several fronts.

One involves Allied's service focus, which is squarely on the desktop computer. Officials say that, for \$55 a month, they'll provide a 10-megabit Internet service to a desktop computer.

That's up to 300 times faster than dial-up Internet access, which costs \$19.95 a month or more, plus a phone line that runs \$30 to \$50 monthly.

On another front, investors believe Allied's team will help in future fund raising. The company says it's raising about \$150 million in debt this calendar year.

Allied's investment bankers are Salomon Smith Barney and Morgan Stanley Dean Witter. Robert Sureck from the high-technology industry group at Chase Bank of Texas is handling Allied's cash management.