

HOGAN & HARTSON  
L.L.P.

DOCKET FILE COPY ORIGINAL

MICHELE C. FARQUHAR  
PARTNER  
DIRECT DIAL (202) 637-5663  
INTERNET MF7@DC2.HHLAW.COM

COLUMBIA SQUARE  
555 THIRTEENTH STREET, NW  
WASHINGTON, DC 20004-1109  
TEL (202) 637-5600  
FAX (202) 637-5910

October 1, 1999

**BY HAND DELIVERY**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20550

RECEIVED  
OCT - 1 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: Consolidated Communications Telecom Services, Inc.—  
Two (2) Applications on FCC Form 601 for Authority to  
Modify Station KWH311 and Associated Petition for  
Waiver from the MAS Application Freeze, WT Docket No.  
97-81**

Dear Ms. Salas:

On behalf of Consolidated Communications Telecom Services, Inc. ("CCTS"), please find a copy of CCTS' Petition for Waiver from the MAS Application Freeze that is being filed simultaneously in Pittsburgh, along with two applications on Form 601 for authority to operate link repeaters in Vandalia and Cartter, Illinois at 928 and 959 MHz, respectively. Please note that CCTS requests expedited action on its waiver petition.

Please file-stamp the designated copy and return it to my office with the messenger. If there are any questions regarding this filing, please call me directly.

Respectfully submitted,

HOGAN & HARTSON L.L.P.



Michele C. Farquhar

Counsel for Consolidated  
Communications Telecom  
Services, Inc.

No. of Copies rec'd 02  
List ABCDE

Enclosures

BRUSSELS BUDAPEST LONDON MOSCOW PARIS\* PRAGUE WARSAW

BALTIMORE, MD BETHESDA, MD COLORADO SPRINGS, CO DENVER, CO LOS ANGELES, CA MCLEAN, VA

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

**RECEIVED**  
OCT - 1 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Consolidated Communications )  
Telecom Services, Inc. )  
 )  
 )  
 )  
 )

WT Docket No. 97-81

PETITION FOR WAIVER – EXPEDITED ACTION REQUESTED

**CONSOLIDATED COMMUNICATIONS  
TELECOM SERVICES, INC.**

Michele C. Farquhar  
HOGAN & HARTSON, L.L.P.  
555 Thirteenth Street, N.W.  
Washington, D.C. 20004-1109  
(202) 637-5600  
Its Attorney

October 1, 1999

TABLE OF CONTENTS

	<u>Page</u>
INTRODUCTION AND SUMMARY .....	2
BACKGROUND .....	2
DISCUSSION.....	6
1.    In View of Unique Factual Circumstances, the Application Freeze Unduly Burdens CCTS .....	8
2.    A Waiver from the MAS Application Freeze for CCTS is in the Public Interest.....	9
3.    No Economically Feasible Alternative to a Waiver from the Application Freeze Exists .....	10
4.    A Waiver Would Not Undermine the Purpose of the MAS Application Freeze .....	11
CONCLUSION.....	12

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

In the Matter of	)	
	)	
Consolidated Communications	)	WT Docket No. 97-81
Telecom Services, Inc.	)	
	)	
	)	
	)	

PETITION FOR WAIVER – EXPEDITED ACTION REQUESTED

Pursuant to Section 1.925 1/ of the Commission's Rules, Consolidated Communications Telecom Services, Inc. ("CCTS") respectfully requests a waiver from the Commission's policy of freezing the 928/959 MHz band from Multiple Address System ("MAS") applications 2/ in order to apply for authority to operate on a single channel pair in the 928/959 MHz band in Cartter and Vandalia, Illinois. 3/

---

1/ 47 C.F.R. § 1.925 ("Section 1.925").

2/ *Amendment of the Commission's Rules Regarding Multiple Address Systems, Further Notice of Proposed Rulemaking and Order, WT Docket No. 97-81, FCC 99-101 (released July 1, 1999) at ¶ 28 ("Multiple Address System Further Notice").*

3/ CCTS' applications for authority to operate at 928 and 959 MHz are attached to this Petition. These applications could not be filed on the Universal Licensing System because of the MAS application freeze. CCTS respectfully requests a waiver from the requirement that Form 601 be filed electronically. See 47 C.F.R. § 1.913(b).

## INTRODUCTION AND SUMMARY

As shown below, CCTS is severely handicapped by the current application freeze and meets the standards established by the Commission for a waiver. In particular, CCTS is unable to use its currently authorized station in Cartter, and soon will be unable to use its authorized station in Vandalia. The public interest would be served by a narrow, limited waiver of the freeze to enable CCTS to acquire replacement frequencies to continue to provide its authorized paging services to its customers.

## BACKGROUND

CCTS operates a simulcast paging system on frequency 158.10 MHz under authorization KWH311 in Illinois. CCTS provides paging service to over 12,000 lines, and among its customers are hospitals, fire departments, police stations, and ambulance services. The CCTS simulcast paging system is licensed to provide service to an area approximately 200 by 140 miles from Benton to Hoopeston, Illinois and from Highland, Illinois to Staunton, Indiana. The CCTS system includes thirty-one transmitter sites, dispersed over a large area by industry standards. As a result, management of the system requires a control station, as well as link repeaters to extend signals to all transmitters in the system. Currently, CCTS operates a control station and four link repeaters on frequencies in the 72 – 75 MHz band in the northern portion of the CCTS system. The control and

repeater stations in this northern portion operate successfully and enable CCTS to provide reliable paging service to its thousands of customers in northern Illinois.

In 1997, CCTS focused on expanding its service offerings to south central Illinois, both to gain new customers and to extend the service area for existing customers. After acquiring a paging license for Benton, Illinois, CCTS obtained a construction permit to build a link repeater at 72.740 MHz in Cartter to enable it to extend service to Benton. In November of 1998, CCTS rolled out service to Benton and surrounding areas.

By January of 1999, however, CCTS had received complaints of television interference from Cartter residents. In response, CCTS devoted considerable time and resources toward remedying the interference. For example, CCTS hired Trott Communications, an outside consultant, to remedy the interference problem. <sup>4/</sup> Despite these efforts, CCTS was forced to shut down the Cartter link repeater because the interference problems could not be immediately resolved. As a result of having to shut down the Cartter transmitter, CCTS has lost its paging customers in Benton and all of the resources it had invested in constructing the facility.

With the assistance of its outside consultant, CCTS has attempted to identify alternative repeater frequencies that will enable restoration of the Cartter

---

<sup>4/</sup> CCTS estimates that it expended more than \$50,000 on constructing the site and attempting to remedy interference. For a description of the attempted

[Footnote continued]

transmitter and related service to south central Illinois. Although CCTS has identified 959 MHz as the best (and possibly only) substitute, the FCC's new application freeze prevents CCTS from applying for authorization to use this and similar alternative channels that would enable CCTS to provide services to south central Illinois. Therefore, CCTS seeks a narrow and limited waiver of the freeze to operate at 959 MHz in Cartter, Illinois.

In addition, CCTS also operates a link repeater at 931.1375 MHz 5/ in Vandalia, Illinois that will communicate with the Cartter link repeater to provide service to south central Illinois. However, once the FCC auctions the 931 MHz frequency in early 2000, CCTS will be unable to operate its Vandalia repeater. Specifically, the auction will authorize new and existing paging licensees to construct new facilities located as close as 30 miles from CCTS' Vandalia link repeater. 6/ The siting of these new facilities will cause interference to this link repeater, rendering it useless.

---

[Footnote continued]

remedies, see August 30, 1999, Affidavit of Doyal J. Vicker, Jr., attached to this Petition as Appendix A.

5/ In 1992, CCTS obtained frequency at 931 MHz in Vandalia after studies concluded that interference to television reception in Vandalia would prevent CCTS from operating at 72 MHz.

6/ See 47 C.F.R. § 22.537(e). The 30-mile figure is the result of calculations, using the formula set out in Section § 22.537(e), performed by CCTS and verified by its outside consultant.

Furthermore, CCTS is unable to obtain spectrum at 931 MHz in the auction. The coverage requirements 7/ for paging operators render CCTS ineligible to participate in the auction because the FCC's rules presuppose that the 931 frequency will be used for mobile instead of fixed services. Thus, in order to provide planned and ongoing service to south central Illinois, CCTS requests that the FCC waive the freeze to permit CCTS to operate its link repeater at 928 MHz in Vandalia.

The application freeze prevents CCTS from extending valuable services and important safety benefits to its customers and the communities in south central Illinois. CCTS' paging customers include numerous emergency service entities, such as Altamont Advanced Emergency Medical Service; Altamont Ambulance Service; Fayette County Hospital; Hillsboro Area Hospital; St. Francis Hospital; Taylor Springs Fire Department; and Montgomery County ESDA. The inability of CCTS to extend its services to south central Illinois harms CCTS, the citizens of south central Illinois, and the public interest generally.

Although CCTS is authorized to provide service to south central Illinois, unique circumstances render it unable to use its existing facilities for this purpose. Authority to obtain replacement frequencies to operate link repeaters in

---

7/ *Revision of Part 22 and Part 90 of the Commission's Rules to Facilitate Further Development of Paging Systems; Implementation of Section 309(j) of the Communications Act—Competitive Bidding, Memorandum Opinion and Order on Reconsideration and Third Report and Order, WT Docket No. 96-18, 64 FR 33762 at ¶ 65 (rel. May 24, 1999) ("Paging Recon Order").*

the 928 and 959 MHz frequency band at locations in Vandalia and Cartter, Illinois, respectively, is necessary in order for CCTS to restore and continue current service to south central Illinois. Thus, CCTS respectfully requests a waiver from the MAS application freeze in light of these egregious circumstances.

## DISCUSSION

Pursuant to Section 1.925, the Commission will waive a requirement of the its Rules if it is demonstrated that either: (1) the underlying purpose of the rule would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest; or (2) in view of unusual factual circumstances of the instant case, application of the rules would be inequitable, unduly burdensome or contrary to public interest, or the applicant has no reasonable alternative. 8/ The facts of this case clearly warrant a waiver under the second standard set forth in Section 1.925.

Although the MAS application freeze is not technically a Commission Rule, Section 1.925 is applicable. The application freeze is a procedural requirement mandated by the Commission, and as a result, has the effect of a Commission Rule. 9/

---

8/ 47 C.F.R. § 1.925.

9/ In the event that the Commission does not agree that Section 1.925 is the appropriate rule to grant relief from the MAS application freeze, CCTS requests that the Commission grant relief under Section 1.41 as an informal request for relief. See *Amendment of the Commission's Rules Regarding Multiple Address*

[Footnote continued]

In the past, the Commission has granted requests for waivers from application freezes. For instance, the Commission granted the New Jersey Transit Authority's request for a waiver from the 800 MHz Application Freeze. 10/ The Commission also granted a similar waiver to Industrial Communications & Electronics, Inc. 11/ Likewise, the Commission should grant CCTS' request if CCTS demonstrates that it meets the requirements for a waiver under Section 1.925.

The Commission should grant CCTS' request for waiver of the MAS application freeze because unique factual circumstances render application of the freeze inequitable and unduly burdensome, a waiver of the freeze for CCTS is in the public interest, and CCTS has no feasible alternative means of restoring and continuing its present services. Furthermore, a waiver will not undermine the purpose of the MAS application freeze.

---

[Footnote continued]

*Systems*, Petition of CellNet Data Systems, Inc., for Expedited Relief from the MAS Application Freeze Limited to a Single Customer Commitment (filed August 17, 1999).

10/ *New Jersey Transit Authority Request for Waiver of the 800 MHz General Category Freeze for Applications*, Order, 14 FCC Rcd 4334 (WTB 1999) (granting a waiver from an application freeze).

11/ In *Industrial Communications & Electronics, Inc.*, Order on Reconsideration, 13 FCC Rcd 8417 (WTB 1998), the FCC granted a waiver from the August 1994 suspension of the acceptance of 800 MHz applications.

**1. In View of Unique Factual Circumstances, the Application Freeze Unduly Burdens CCTS**

CCTS is plagued by unique circumstances that prevent it from restoring and continuing its ongoing service to south central Illinois. The MAS application freeze uniquely affects CCTS as compared to other carriers because CCTS is currently unable to provide authorized services and will face the same problem for even more customers. CCTS has already obtained the necessary FCC authority to extend its simulcast paging service to south central Illinois, and actually deployed service to customers in this region. CCTS also extended the range of the services it provided to existing customers in northern Illinois.

After CCTS rolled out service to southern Illinois by constructing a link repeater at Cartter, Illinois, interference with television reception forced CCTS to discontinue service to its new serving area. Cartter is uniquely located in a particularly weak television signal area. In order to receive a television signal, Cartter residents had to erect individual antenna systems. <sup>12/</sup> CCTS' link repeater at 72.740 MHz, which it erected to extend service to south central Illinois, prevented reception of Channels 4 and 5 in Cartter. <sup>13/</sup> This unique and unusual circumstance prevented CCTS from continuing its new service offering and caused CCTS to lose its new customers in this region of south central Illinois.

---

<sup>12/</sup> See Appendix A (August 30, 1999 Affidavit of Doyal J. McVicker, Jr.).

<sup>13/</sup> See August 30, 1999 Affidavit of Dave Campbell, Chief Engineer and Station Manager of WPXS TV, attached to this Petition as Appendix B.

CCTS also faces unique circumstances in operating its link repeater at 931 MHz in Vandalia, Illinois. Once the FCC auctions the paging frequency at 931 MHz in early 2000, new and existing paging providers will construct facilities as close as 30 miles from Vandalia. <sup>14/</sup> These new facilities will interfere with the signals received and transmitted by CCTS' link repeater. As a result of this interference, CCTS will be unable to communicate with its repeater in Carter, Illinois.

Unquestionably, the MAS application freeze is inequitable and unduly burdensome to CCTS. Despite FCC approval, unique circumstances prevent CCTS from fulfilling its obligations to its customers. The application freeze prevents CCTS from even applying for an alternative authorization that would remedy this situation.

## **2. A Waiver from the MAS Application Freeze for CCTS is in the Public Interest**

Furthermore, the application freeze harms the public interest in this case because CCTS is unable to obtain access to frequencies needed to provide promised services. CCTS provides reliable paging services to hospitals, fire departments, ambulance services, and police departments. CCTS' expansion into south central Illinois enabled CCTS to serve more emergency service providers and to increase the range of its service for existing emergency service providers. In

---

<sup>14/</sup> See *supra* note 6.

addition to emergency service providers, CCTS provides valuable services to other customers and CCTS could increase these benefits if it was able to expand, as planned, into south central Illinois.

Moreover, a waiver of the application freeze is in the interest of Cartter residents. Permitting CCTS to relocate to another frequency will eliminate potential interference with their television reception.

### **3. No Economically Feasible Alternative to a Waiver from the Application Freeze Exists**

CCTS has no economically feasible alternative to a waiver from the MAS application freeze that will enable it to restore and continue service to south central Illinois. CCTS endured a significant hardship because it actually deployed services using the Cartter link repeater. CCTS expended resources to construct the Cartter station and to attempt to remedy the interference. The sooner that CCTS is able to re-offer service to south central Illinois, the greater opportunity it has to regain the customers it lost as a result of having to discontinue its service.

The FCC initially froze MAS spectrum in 1997. <sup>15/</sup> CCTS cannot possibly await a final decision in this proceeding to re-enter the market and roll-out the services it is already authorized to provide. Furthermore, CCTS cannot acquire a frequency at 931 MHz through the upcoming auction because its proposed use

---

<sup>15/</sup> *Amendment of the Commission's Rules Regarding Multiple Address Systems, Notice of Proposed Rulemaking, WT Docket No. 97-81, 12 FCC Rcd 7973, 8003 (1997).*

does not allow it to meet the relevant coverage requirement. 16/ The coverage requirement presupposes use of the frequencies in standard paging operations rather than for link repeater use.

#### **4. A Waiver Would Not Undermine the Purpose of the MAS Application Freeze**

The purpose of the Commission's MAS application freeze is to ensure the effectiveness of the decisions made and standards developed in the MAS proceeding. 17/ Furthermore, the MAS application freeze is consistent with the measures taken in every other service area where geographic area licensing and auction rules are to be implemented. 18/ As noted below, granting a waiver to CCTS would not undermine the purpose behind the MAS application freeze.

First, CCTS' applications are not speculative because CCTS has already been authorized by the Commission to provide its services to south central Illinois. A waiver will simply enable CCTS to replace existing frequencies in order to restore service to its customers in this region and to continue ongoing service offerings. CCTS did not previously request 928 and 959 MHz spectrum because it

---

16/ *Paging Recon Order* at ¶ 65.

17/ *Multiple Address System Further Notice* at ¶ 18 (citing *Revision of Part 22 and Part 90 of the Commission's Rules to Facilitate the Future Development of Paging Systems*, Notice of Proposed Rulemaking, WT Docket No. 96-18, 11 FCC Rcd 3108, 3136 n. 270 (1998)).

18/ *Id.*

had obtained authority to operate at 72-75 MHz. As noted, however, interference crippled CCTS' efforts to expand service as planned.

Second, granting CCTS a waiver from the application freeze will not affect the proposed geographic area-licensing scheme. CCTS is seeking a very narrow, limited waiver from the freeze for remote areas where there is an abundance of available MAS frequencies. For instance, of the six available frequencies in the 928 MHz band, only one is in use in the Illinois region and it is being operated over 63 miles from Vandalia. Similarly, with respect to the 959 MHz band, only two frequencies are in use in the Illinois region and the closest to Cartter, Illinois is still 69 miles away.

## CONCLUSION

CCTS respectfully requests that the Commission expeditiously grant the requested waiver from the MAS application freeze. CCTS emphasizes that it is applying for authorization for replacement frequencies only in areas where it was already authorized to provide services. Waiver of the freeze is justified by CCTS' unique factual circumstances that make the application of the freeze contrary to the public interest, and CCTS lacks feasible alternatives. For the reasons described

above, grant of the waiver would serve the public interest and would not undermine the purpose of the suspension of licensing.

Respectfully submitted,

**Consolidated Communications  
Telecom Services, Inc.**

By: *Michele Farquhar*  
Michele C. Farquhar  
HOGAN & HARTSON, L.L.P.  
555 Thirteenth Street, N.W.  
Washington, D.C. 20004-1109  
(202) 637-5600

Its Attorney

Dated: October 1, 1999

AFFIDAVIT  
AUGUST 30, 1999

Blanking interference under part 22.353

Stations involved:   KWH311       Location Id 12 Antenna 2 Frequency 72.740 Mhz.  
                          KMOV – TV   Channel 4  
                          KSDK – TV   Channel 5

Area of reported interference: The town of Cartter, Illinois, located at 38° 32' 28" North Latitude 88° 54' 45" West Longitude.

:	Distance	bearing from Cartter Il.
Cartter to KWH311 Loc 12	1.055 Km	283°
Cartter to KMOV	120.39 Km	269°
Cartter to KSDK	123.77 Km	271°

The community of Cartter, Illinois has enjoyed reception of channels 4 and 5 without undue interference. Cartter is in a weak signal area and does not have a Cable TV system. The population of Cartter had to erect individual antenna systems in order to receive any TV signal. The antenna systems appear to consist of a 12-meter tower with a high-gain TV antenna and a mast-mounted broad band amplifier. This arrangement allows the residents of Cartter to enjoy TV programming from the Saint Louis, Mo. area.

When Consolidated Communications Telecomm Services placed the 72.740 Mhz control station on the air, the signal prevented reception of Channels 4 and 5 in Cartter due to amplifier blockage. The transmitter was completely checked for proper operation and a band pass cavity was inserted in the antenna feed. Stop band filters were acquired but to no avail. A combination of filters and power reduction was attempted and again with out success.

Therefore I, Doyal J. McVicker Jr., recommend that in the public interest, convenience, and necessity, Consolidated Communication Telecom Services be granted a waiver which will allow a frequency change to a control station frequency in the 959 Mhz band.

I, Doyal J. McVicker Jr. do hereby attest that the above information is true and accurate to the best of my knowledge.

  
Doyal J. McVicker Jr. N.C.E. E1-00596

AFFIDAVIT  
SEPTEMBER 1, 1999

Blanking interference under part 22.353

As station manager and chief engineer at WPXS-TV, which is located 1.055 km west of Cartter, Illinois, I want to document the interference problems to channels 4 and 5 out of St. Louis as they relate to Consolidated Communications Telecom Services' (a subsidiary of McLeod Telecom Services, Inc.) 72.740 MHz on-air control station at Cartter. When on the air, the 72.740 MHz frequency fully saturates the wide-band, mast-mounted TV amplifiers in use by Cartter residents, causing complete blackout of channels 4 and 5. At times, these interference problems have even been reported as high as channels 6 and 7.

I have worked with CCTS to correct this problem by keeping 72.740 MHz in operation, but at that frequency, no workable solutions have been found. CCTS can, however, eliminate the problem by moving its control station frequency to the 959 MHz band.

It is in the public's best interest, convenience and necessity for CCTS to be granted a waiver to allow them to operate in the 959 MHz band. This should eliminate all blanking interference problems for Cartter-area viewers of channels 4 and 5.

I, Dave Campbell, do hereby attest that the above information is true and accurate to the best of my knowledge.



---

Dave Campbell, Chief Engineer and Station Manager, WPXS TV

CARTER 11

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING

APPROVED BY OMB 3060-0589

FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE

SPECIAL USE
FCC USE ONLY

(1) LOCKBOX # 358130

PAGE NO. \_\_\_\_\_ OF \_\_\_\_\_

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) Hogan & Hartson L.L.P.		(3) TOTAL AMOUNT PAID (dollars and cents) \$ 430.00
(4) STREET ADDRESS LINE NO. 1 555 Thirteenth St., N.W.		
(5) STREET ADDRESS LINE NO. 2 c/o Michele C. Farquhar		
(6) CITY Washington	(7) STATE D.C.	(8) ZIP CODE 20004
(9) DAYTIME TELEPHONE NUMBER (include area code) (202) 637-5600	(10) COUNTRY CODE (if not in U.S.A.)	

IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B  
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)

SECTION B - APPLICANT INFORMATION

(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card) Consolidated Communications Telecom Services, Inc.		
(12) STREET ADDRESS LINE NO. 1 121 South Seventeenth St.		
(13) STREET ADDRESS LINE NO. 2		
(14) CITY Mattoon	(15) STATE IL	(16) ZIP CODE 61938
(17) DAYTIME TELEPHONE NUMBER (include area code) (217) 235 4487	(18) COUNTRY CODE (if not in U.S.A.)	

COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEETS (FORM 159-C)

SECTION C - PAYMENT INFORMATION

(19A) FCC CALL SIGN/OTHER ID KWH311	(20A) PAYMENT TYPE CODE (PTC) P D W M	(21A) QUANTITY 1	(22A) FEE DUE FOR (PTC) IN BLOCK 20A \$ 135	FCC USE ONLY
(23A) FCC CODE 1		(24A) FCC CODE 2		
(19B) FCC CALL SIGN/OTHER ID KWH311	(20B) PAYMENT TYPE CODE (PTC) C M D	(21B) QUANTITY 1	(22B) FEE DUE FOR (PTC) IN BLOCK 20B \$ 295	FCC USE ONLY
(23B) FCC CODE 1		(24B) FCC CODE 2		
(19C) FCC CALL SIGN/OTHER ID	(20C) PAYMENT TYPE CODE (PTC)	(21C) QUANTITY	(22C) FEE DUE FOR (PTC) IN BLOCK 20C \$	FCC USE ONLY
(23C) FCC CODE 1		(24C) FCC CODE 2		
(19D) FCC CALL SIGN/OTHER ID	(20D) PAYMENT TYPE CODE (PTC)	(21D) QUANTITY	(22D) FEE DUE FOR (PTC) IN BLOCK 20D \$	FCC USE ONLY
(23D) FCC CODE 1		(24D) FCC CODE 2		

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN 0 5 3 0 0 8 4 7 0 4	(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-11 IS DIFFERENT FROM PAYER NAME IN A-2 APPLICANT TIN 0 3 7 1 1 7 6 1 3 1
---------------------------------------	---

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT  
I, \_\_\_\_\_, Certify under penalty of perjury that the foregoing and supporting information are true and correct to the best of my knowledge, information and belief. SIGNATURE \_\_\_\_\_  
(PRINT NAME)

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD/VISA ACCOUNT NUMBER: MASTERCARD	EXPIRATION DATE: MONTH YEAR
VISA	I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization(s) herein described.
AUTHORIZED SIGNATURE	DATE

HOGAN & HARTSON  
L.L.P.

MICHELE C. FARQUHAR  
PARTNER  
DIRECT DIAL (202) 637-5663  
INTERNET MF7@DC2.HHLAW.COM

COLUMBIA SQUARE  
555 THIRTEENTH STREET, NW  
WASHINGTON, DC 20004-1109  
TEL (202) 637-5600  
FAX (202) 637-5910

October 1, 1999

***BY HAND DELIVERY***

Magalie Roman Salas, Secretary  
Federal Communications Commission  
Wireless Bureau Applications  
P.O. Box 358130  
Pittsburgh, PA 15251-5130

**Re: Consolidated Communications Telecom Services, Inc.—  
Two (2) Applications on FCC Form 601 for Authority to  
Modify Station KWH311 and Associated Petition for  
Waiver from the MAS Application Freeze, WT Docket No.  
97-81**

Dear Ms. Salas:

On behalf of Consolidated Communications Telecom Services, Inc. ("CCTS"), please find, in triplicate, two applications on Form 601 for authority to operate link repeaters in Vandalia and Cartter, Illinois at 928 and 959 MHz, respectively. Also enclosed and associated with each of the above-described applications, is CCTS' Petition for a Waiver from the Commission's MAS Application Freeze in WT Docket No. 97-81. Please note that CCTS requests expedited action on its waiver petition.

Also enclosed are the necessary FCC Forms 159 and two checks each in the amount of \$430.00 and payable to the Federal Communications Commission, along with a self-addressed envelope for return of the enclosed file stamped copies.

BRUSSELS BUDAPEST LONDON MOSCOW PARIS\* PRAGUE WARSAW

BALTIMORE, MD BETHESDA, MD COLORADO SPRINGS, CO DENVER, CO LOS ANGELES, CA McLEAN, VA

HOGAN & HARTSON L.L.P.

Ms. Magalie Roman Salas  
October 1, 1999  
Page 2

If there are any questions regarding this filing, please call me directly.

Respectfully submitted,

HOGAN & HARTSON L.L.P.



Michele C. Farquhar

Counsel for Consolidated  
Communications Telecom  
Services, Inc.

Enclosures

cc: Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20550

Shellie Blakeley  
Wireless Telecommunications Bureau,  
Public Safety and Private  
Wireless Division

Scot Stone  
Wireless Telecommunications Bureau  
Public Safety and Private  
Wireless Division

Gaspar Messina  
Wireless Telecommunications Bureau,  
Commercial Wireless Division

1) Radio Service Code:  CD	1a) Existing Radio Service Code:
----------------------------------	----------------------------------

**Application Purpose (Select only one) ( MD )**

2) <b>NE</b> - New <b>MD</b> - Modification <b>AM</b> - Amendment	<b>RO</b> - Renewal Only <b>RM</b> - Renewal/Modification <b>CA</b> - Cancellation of License	<b>CO</b> - Consolidate Call Signs <b>WD</b> - Withdrawal of Application <b>DU</b> - Duplicate License	<b>NT</b> - Required Notifications <b>EX</b> - Requests for Extension of Time <b>AU</b> - Administrative Update
3a) If this request is for a <u>D</u> evelopmental License or an <u>S</u> TA (Special Temporary Authorization), enter the appropriate code and attach the required exhibit as described in the instructions. Otherwise enter <u>N</u> (Not Applicable).	( N ) <u>D</u> <u>S</u> <u>N/A</u>		
3b) If this request is for Special Temporary Authority due to an emergency situation, enter 'Y'; otherwise enter 'N'	( N ) <u>Y</u> es <u>N</u> o		
4) If this request is for an Amendment or Withdrawal, enter the file number of the pending application currently on file with the FCC.	File Number		
5) If this request is for a Modification, Renewal Only, Renewal/Modification, Cancellation of License, Consolidate Call Signs, Duplicate License, or Administrative Update, enter the call sign of the existing FCC license.	Call Sign KWH311		
6) If this request is for a New, Amendment, Renewal Only, or Renewal/Modification, enter the requested authorization expiration date (this item is optional).	MM DD		
7) If this request is for a Modification, Renewal/Modification, or Amendment (of a currently pending New or Modification) of a site-specific authorization (other than Part 101 Microwave), will the request increase or expand the composite coverage area, service area, or interference contour as defined in the Commission's rules for your service; or for a Cellular authorization, will the request result in an expansion of the CGSA (after expiration of the 5 year build out period), a de minimus SAB extension into unserved area in an adjacent market, or a change of channel block as defined in Part 22 of the Commission's rules?	( N ) <u>Y</u> es <u>N</u> o		
8a) Does this filing request a Waiver of the Commission's rules? If 'Yes', attach an exhibit providing rule numbers and explaining circumstances.	( <u>Y</u> ) <u>Y</u> es <u>N</u> o		
8b) If a feeable waiver request is attached, multiply the number of stations times the number of rule sections and enter the result.	1		
9) Are attachments being filed with this application?	( <u>Y</u> ) <u>Y</u> es <u>N</u> o		

See  
attach.  
petiti

**Applicant Information**

10a) Taxpayer Identification Number: 371176131	10b) SGIN:
11) Applicant/Licensee is a(n): ( C ) <u>I</u> ndividual <u>U</u> nincorporated Association <u>T</u> rust <u>G</u> overnment Entity <u>J</u> oint Venture <u>C</u> orporation <u>L</u> imited Liability Corporation <u>P</u> artnership <u>C</u> onsortium	
12) First Name (if individual):	MI: Last Name: Suffix:
13) Entity Name (if other than individual): Consolidated Communications Telecom Services, Inc.	
14) Name of Real Party in Interest of Applicant: McLeodUSA, Inc.	15) Taxpayer Identification Number: 421407240

**Applicant Information (continued)**

16) Attention To: <b>Douglas E. Feavel</b>		
17) P.O. Box:	And /Or	18) Street Address: <b>121 South 17th Street</b>
19) City: <b>Mattoon</b>	20) State: <b>IL</b>	21) Zip: <b>61938</b>
22) Telephone Number: <b>217/235-4487</b>		23) FAX: <b>217/235-3800</b>
24) E-Mail Address: <b>dfeavel@McLeodUSA.com</b>		

**Contact Information (If different from the applicant)**

25) First Name: <b>Michele</b>	MI: <b>C</b>	Last Name: <b>Farquhar</b>	Suffix: <b>Esq</b>
26) Entity Name: <b>Hogan &amp; Hartson</b>			
27) P.O. Box:	And /Or	28) Street Address: <b>555 13th Street, N.W.</b>	
29) City: <b>Washington</b>	30) State: <b>DC</b>	31) Zip: <b>20004</b>	
32) Telephone Number: <b>202/637-5663</b>		33) FAX: <b>202/637-5910</b>	
34) E-Mail Address: <b>MCFarquhar@hhlaw.com</b>			

**Regulatory Status**

35) This filing is for authorization to provide or use the following type(s) of radio service offering (enter all that apply):  <input checked="" type="checkbox"/> Common Carrier <input type="checkbox"/> Non-Common Carrier <input type="checkbox"/> Private, internal communications
--

**Type of Radio Service**

36) This filing is for authorization to provide the following type(s) of radio service (enter all that apply):  <input checked="" type="checkbox"/> Fixed <input checked="" type="checkbox"/> Mobile <input type="checkbox"/> Radiolocation <input type="checkbox"/> Satellite (sound)
37) Interconnected Service? <span style="float: right;">( <input checked="" type="checkbox"/> ) Yes <input type="checkbox"/> No</span>

**Fee Status**

38) Is the applicant exempt from FCC application fees? <span style="float: right;">( <input type="checkbox"/> ) Yes <input checked="" type="checkbox"/> No</span>
39) Is the applicant exempt from FCC regulatory fees? <span style="float: right;">( <input type="checkbox"/> ) Yes <input checked="" type="checkbox"/> No</span>

**Alien Ownership Questions**

40) Is the applicant a foreign government or the representative of any foreign government?	( <input type="radio"/> N ) <input checked="" type="radio"/> Yes <input type="radio"/> No
41) Is the applicant an alien or the representative of an alien?	( <input type="radio"/> N ) <input checked="" type="radio"/> Yes <input type="radio"/> No
42) Is the applicant a corporation organized under the laws of any foreign government?	( <input type="radio"/> N ) <input checked="" type="radio"/> Yes <input type="radio"/> No
43) Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	( <input type="radio"/> N ) <input checked="" type="radio"/> Yes <input type="radio"/> No
44) Is the applicant directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country? If 'Yes', attach exhibit explaining nature and extent of alien or foreign ownership or control.	( <input type="radio"/> N ) <input checked="" type="radio"/> Yes <input type="radio"/> No

**Basic Qualification Questions**

45) Has the applicant or any party to this application or amendment had any FCC station authorization, license, or construction permit revoked or had any application for an initial, modification or renewal of FCC station authorization, license, construction permit denied by the Commission? If 'Yes', attach exhibit explaining circumstances.	( <input type="radio"/> N ) <input checked="" type="radio"/> Yes <input type="radio"/> No
46) Has the applicant or any party to this application or amendment, or any party directly or indirectly controlling the applicant, ever been convicted of a felony by any state or federal court? If 'Yes', attach exhibit explaining circumstances.	( <input type="radio"/> N ) <input checked="" type="radio"/> Yes <input type="radio"/> No
47) Has any court finally adjudged the applicant or any party directly or indirectly controlling the applicant guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement, or any other means or unfair methods of competition? If 'Yes', attach exhibit explaining circumstances.	( <input type="radio"/> N ) <input checked="" type="radio"/> Yes <input type="radio"/> No
48) Is the applicant or any party directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If 'Yes', attach exhibit explaining circumstances.	( <input type="radio"/> N ) <input checked="" type="radio"/> Yes <input type="radio"/> No

**49) Race, Ethnicity, and Gender of Applicant/Licensee (Optional):**

<b>Race:</b>	American Indian or Alaska Native:	Asian:	Black or African-American:	Native Hawaiian or Other Pacific Islander:	White:
<b>Ethnicity:</b>	Hispanic or Latino:	Not Hispanic or Latino:			
<b>Gender:</b>	Female:	Male:			

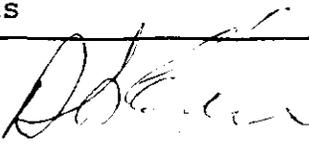
**General Certification Statements**

1) The applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application.
2) The applicant certifies that grant of this application would not cause the applicant to be in violation of any pertinent cross-ownership, attribution, or spectrum cap rule.  *If the applicant has sought a waiver of any such rule in connection with this application, it may make this certification subject to the outcome of the waiver request.
3) The applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.
4) The applicant certifies that neither the applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification.
5) The applicant certifies that it either (1) has a current Form 602 on file with the Commission, (2) is filing an updated Form 602 simultaneously with this application, or (3) is not required to file Form 602 under the Commission's Rules.

**Signature**

50) Typed or Printed Name of Party Authorized to Sign

First Name: Dennis	MI: L	Last Name: Erickson	Suffix:
-----------------------	----------	------------------------	---------

51) Title: VP Operations	
Signature: 	52) Date: 9/16/99

Failure To Sign This Application May Result In Dismissal Of The Application And Forfeiture Of Any Fees Paid

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

1) Action Requested: ( <input checked="" type="checkbox"/> A ) <input type="checkbox"/> Add <input type="checkbox"/> Mod <input type="checkbox"/> Del		2) Location Number: 11	
3) Location Description: Fixed		4) Area of Operation Code:	
5) Location Name:			
6) FCC Antenna Structure Registration # or N/A (FAA Notification not Required) 1055974			
7) Latitude (DD-MM-SS.S): 38-32-39		8) Longitude (DDD-MM-SS.S): 088-55-26	
NAD83 ( <input type="checkbox"/> N ) <u>N</u> or <u>S</u>		NAD83 ( <input type="checkbox"/> W ) <u>E</u> or <u>W</u>	
9) Street Address, Name of Landing Area, or Other Location Description: 3.2 km NE of SH161 & I-37			
10) City: Cartter		11) State: IL	
12) County: Jefferson			
13) Elevation of Site AMSL (meters) ( 'a' in antenna structure example ): 172.2		14) Overall Ht AGL Without Appurtenances (meters) ( 'b' in antenna structure example ): 300.2	
15) Overall Ht AGL With Appurtenances (meters) ( 'c' in antenna structure example ): 300.2			
16) Support Structure Type: Tower			
17) Location Number: (only for Area of Operation Code 'A')		18) Radius (km):	
19) Airport Identifier:		20) Site Status:	
21) Maximum Latitude (DD-MM-SS.S): Use for rectangle only (Northwest corner)		22) Maximum Longitude (DDD-MM-SS.S): Use for rectangle only (Northwest corner)	
NAD83 ( <input type="checkbox"/> ) <u>N</u> or <u>S</u>		NAD83 ( <input type="checkbox"/> ) <u>E</u> or <u>W</u>	
23) Do you propose to operate in an area that requires frequency coordination with Canada? ( <input type="checkbox"/> N ) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
24) Description: (only for Area of Operation Code 'O')			
25) Number of Units: ___ Hand Held ___ Mobile ___ Temporary Fixed ___ Aircraft ___ Itinerant			
26) Would a Commission grant of Authorization for this location be an action which may have a significant environmental effect? See Section 1.1307 of 47 CFR. If 'Yes', submit an environmental assessment as required by 47 CFR, Sections 1.1308 and 1.1311. ( <input type="checkbox"/> N ) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
27) If the proposed site is located in one of the quiet zones listed in Item 27 of the Instructions, provide the date the proper authority was notified:			

Technical Data Schedule for the  
Paging, Rural, Air-ground (General Aviation), and  
Offshore Radiotelephone Services (Part 22)

Control Points

1) Action A/M/D	2) Control Point Number	3) Location Street Address, City or Town, County, State	4) Telephone Number

Antenna Information

5) Action A/M/D	6) Location Number	7) Antenna Number	8) Height to Tip AGL (meters)	9) Height of Center of Radiation AAT (meters)	10) Beamwidth of Main Lobe (degrees)	11) Gain (dB)	12) Azimuth (degrees)
A	11	2	152	161	360	10	

Frequency Information

13) Action A/M/D	14) Location Number	15) Antenna Number	16) Channel Center Frequency (MHz)		17) Station Class	18) Maximum Transmitting ERP (watts)	19) Transmitter Output Power (watts)	20) Nonstandard Emission Designator
A	11	2	Existing (if mod)	New 959.9125	FXXR	150	108	
			Existing (if mod)	New				
			Existing (if mod)	New				
			Existing (if mod)	New				
			Existing (if mod)	New				
			Existing (if mod)	New				
			Existing (if mod)	New				

**Radial Data for Antennas**

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHz)	25) RCHAAT (meters)	161	159	161	165	151	159	166	163
A	11	2	959.9125	26) ERP (watts)	150	150	150	150	150	150	150	150

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHz)	25) RCHAAT (meters)								
				26) ERP (watts)								

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHz)	25) RCHAAT (meters)								
				26) ERP (watts)								

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHz)	25) RCHAAT (meters)								
				26) ERP (watts)								

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHz)	25) RCHAAT (meters)								
				26) ERP (watts)								



CHECK NO. | CHECK DATE | VENDOR NO.  
234396 | 09/28/99 | F07025

**HOGAN & HARTSON L.L.P.**  
ATTORNEYS AT LAW  
555 13TH STREET, N.W.  
WASHINGTON, D.C. 20004

CHECK NO. 234396

NATIONS BANK  
WASHINGTON, D.C.

15-120  
540

CHECK AMOUNT

430.00

FOUR HUNDRED THIRTY AND 00/100  
PAY  
TO THE FEDERAL COMMUNICATIONS  
ORDER OF COMMISSION

AMOUNTS OVER \$500. REQUIRE TWO SIGNATURES

*B. A. Oll*  
AUTHORIZED SIGNATURE

⑈ 234396⑈ ⑆054001204⑆ 002086539194⑈



CHECK NO. | CHECK DATE | VENDOR NO.  
234397 | 09/28/99 | F07025

**HOGAN & HARTSON L.L.P.**  
ATTORNEYS AT LAW  
555 13TH STREET, N.W.  
WASHINGTON, D.C. 20004

CHECK NO. 234397

NATIONS BANK  
WASHINGTON, D.C.

15-120  
540

CHECK AMOUNT

430.00

FOUR HUNDRED THIRTY AND 00/100

PAY  
TO THE FEDERAL COMMUNICATIONS  
ORDER OF COMMISSION

AMOUNTS OVER \$500. REQUIRE TWO SIGNATURES



AUTHORIZED SIGNATURE

⑈ 234397 ⑈ ⑆ 054001204 ⑆ 002086539194 ⑈

**HOGAN & HARTSON**  
**L.L.P.**

MICHELE C. FARQUHAR  
PARTNER  
DIRECT DIAL (202) 637-5663  
INTERNET MF7@DC2.HHLAW.COM

COLUMBIA SQUARE  
555 THIRTEENTH STREET, NW  
WASHINGTON, DC 20004-1109  
TEL (202) 637-5600  
FAX (202) 637-5910

October 1, 1999

***BY HAND DELIVERY***

Magalie Roman Salas, Secretary  
Federal Communications Commission  
Wireless Bureau Applications  
P.O. Box 358130  
Pittsburgh, PA 15251-5130

**Re: Consolidated Communications Telecom Services, Inc.—  
Two (2) Applications on FCC Form 601 for Authority to  
Modify Station KWH311 and Associated Petition for  
Waiver from the MAS Application Freeze, WT Docket No.  
97-81**

Dear Ms. Salas:

On behalf of Consolidated Communications Telecom Services, Inc. ("CCTS"), please find, in triplicate, two applications on Form 601 for authority to operate link repeaters in Vandalia and Cartter, Illinois at 928 and 959 MHz, respectively. Also enclosed and associated with each of the above-described applications, is CCTS' Petition for a Waiver from the Commission's MAS Application Freeze in WT Docket No. 97-81. Please note that CCTS requests expedited action on its waiver petition.

Also enclosed are the necessary FCC Forms 159 and two checks each in the amount of \$430.00 and payable to the Federal Communications Commission, along with a self-addressed envelope for return of the enclosed file stamped copies.

HOGAN & HARTSON L.L.P.

Ms. Magalie Roman Salas

October 1, 1999

Page 2

If there are any questions regarding this filing, please call me directly.

Respectfully submitted,

HOGAN & HARTSON L.L.P.



Michele C. Farquhar

Counsel for Consolidated  
Communications Telecom  
Services, Inc.

Enclosures

cc: Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20550

Shellie Blakeley  
Wireless Telecommunications Bureau,  
Public Safety and Private  
Wireless Division

Scot Stone  
Wireless Telecommunications Bureau  
Public Safety and Private  
Wireless Division

Gaspar Messina  
Wireless Telecommunications Bureau,  
Commercial Wireless Division

1) Radio Service Code: CD	1a) Existing Radio Service Code:
------------------------------	----------------------------------

Application Purpose (Select only one) ( MD )

2)	NE - New MD - Modification AM - Amendment	RO - Renewal Only RM - Renewal/Modification CA - Cancellation of License	CO - Consolidate Call Signs WD - Withdrawal of Application DU - Duplicate License	NT - Required Notifications EX - Requests for Extension of Time AU - Administrative Update
3a)	If this request is for a <u>D</u> evelopmental License or an <u>S</u> TA (Special Temporary Authorization), enter the appropriate code and attach the required exhibit as described in the instructions. Otherwise enter <u>N</u> (Not Applicable).			( N ) <u>D</u> <u>S</u> <u>N/A</u>
3b)	If this request is for Special Temporary Authority due to an emergency situation, enter 'Y'; otherwise enter 'N'			( N ) <u>Y</u> <u>No</u>
4)	If this request is for an Amendment or Withdrawal, enter the file number of the pending application currently on file with the FCC.			File Number
5)	If this request is for a Modification, Renewal Only, Renewal/Modification, Cancellation of License, Consolidate Call Signs, Duplicate License, or Administrative Update, enter the call sign of the existing FCC license.			Call Sign KWH311
6)	If this request is for a New, Amendment, Renewal Only, or Renewal/Modification, enter the requested authorization expiration date (this item is optional).			MM DD
7)	If this request is for a Modification, Renewal/Modification, or Amendment (of a currently pending New or Modification) of a site-specific authorization (other than Part 101 Microwave), will the request increase or expand the composite coverage area, service area, or interference contour as defined in the Commission's rules for your service; or for a Cellular authorization, will the request result in an expansion of the CGSA (after expiration of the 5 year build out period), a de minimus SAB extension into unserved area in an adjacent market, or a change of channel block as defined in Part 22 of the Commission's rules?			( N ) <u>Y</u> <u>No</u>
8a)	Does this filing request a Waiver of the Commission's rules? If 'Yes', attach an exhibit providing rule numbers and explaining circumstances.			( <u>Y</u> ) <u>Yes</u> <u>No</u>
8b)	If a feeable waiver request is attached, multiply the number of stations times the number of rule sections and enter the result.			1
9)	Are attachments being filed with this application?			( <u>Y</u> ) <u>Yes</u> <u>No</u>

See  
attached  
petition

Applicant Information

10a) Taxpayer Identification Number:	371176131	10b) SGIN:	
11) Applicant/Licensee is a(n): ( C )	<u>I</u> ndividual <u>C</u> orporation	<u>U</u> ncorporated Association <u>L</u> imited Liability Corporation	<u>T</u> rust <u>P</u> artnership
		<u>G</u> overnment Entity <u>C</u> onsortium	<u>J</u> oint Venture
12) First Name (if individual):	MI:	Last Name:	Suffix:
13) Entity Name (if other than individual): Consolidated Communications Telecom Services, Inc.			
14) Name of Real Party in Interest of Applicant:	McLeodUSA, Inc.	15) Taxpayer Identification Number:	421407240

**Applicant Information** (continued)

16) Attention To: <b>Douglas E. Feavel</b>			
17) P.O. Box:	And /Or	18) Street Address: <b>121 South 17th Street</b>	
19) City: <b>Mattoon</b>	20) State: <b>IL</b>	21) Zip: <b>61938</b>	
22) Telephone Number: <b>217/235-4487</b>		23) FAX: <b>217/235-3800</b>	
24) E-Mail Address: <b>dfaveal@McLeodUSA.com</b>			

**Contact Information** (If different from the applicant)

25) First Name: <b>Michele</b>	MI: <b>C</b>	Last Name: <b>Farquhar</b>	Suffix: <b>Esq</b>
26) Entity Name: <b>Hogan &amp; Hartson</b>			
27) P.O. Box:	And /Or	28) Street Address: <b>555 13th Street, N.W.</b>	
29) City: <b>Washington</b>	30) State: <b>DC</b>	31) Zip: <b>20004</b>	
32) Telephone Number: <b>202/637-5663</b>		33) FAX: <b>202/637-5910</b>	
34) E-Mail Address: <b>MCFarquhar@hhlaw.com</b>			

**Regulatory Status**

35) This filing is for authorization to provide or use the following type(s) of radio service offering (enter all that apply):		
( <input checked="" type="checkbox"/> ) <u>C</u> ommon Carrier	( <input type="checkbox"/> ) <u>N</u> on-Common Carrier	( <input type="checkbox"/> ) <u>P</u> rivate, internal communications

**Type of Radio Service**

36) This filing is for authorization to provide the following type(s) of radio service (enter all that apply):			
( <input checked="" type="checkbox"/> ) <u>F</u> ixed	( <input checked="" type="checkbox"/> ) <u>M</u> obile	( <input type="checkbox"/> ) <u>R</u> adiolocation	( <input type="checkbox"/> ) <u>S</u> atellite (sound)
37) Interconnected Service?			( <input checked="" type="checkbox"/> ) <u>Y</u> es <input type="checkbox"/> <u>N</u> o

**Fee Status**

38) Is the applicant exempt from FCC application fees?	( <input checked="" type="checkbox"/> ) <u>N</u> Yes <input type="checkbox"/> <u>N</u> o
39) Is the applicant exempt from FCC regulatory fees?	( <input checked="" type="checkbox"/> ) <u>N</u> Yes <input type="checkbox"/> <u>N</u> o

**Alien Ownership Questions**

40) Is the applicant a foreign government or the representative of any foreign government?	( N ) <u>Yes</u> No
41) Is the applicant an alien or the representative of an alien?	( N ) <u>Yes</u> No
42) Is the applicant a corporation organized under the laws of any foreign government?	( N ) <u>Yes</u> No
43) Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	( N ) <u>Yes</u> No
44) Is the applicant directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country? If 'Yes', attach exhibit explaining nature and extent of alien or foreign ownership or control.	( N ) <u>Yes</u> No

**Basic Qualification Questions**

45) Has the applicant or any party to this application or amendment had any FCC station authorization, license, or construction permit revoked or had any application for an initial, modification or renewal of FCC station authorization, license, construction permit denied by the Commission? If 'Yes', attach exhibit explaining circumstances.	( N ) <u>Yes</u> No
46) Has the applicant or any party to this application or amendment, or any party directly or indirectly controlling the applicant, ever been convicted of a felony by any state or federal court? If 'Yes', attach exhibit explaining circumstances.	( N ) <u>Yes</u> No
47) Has any court finally adjudged the applicant or any party directly or indirectly controlling the applicant guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement, or any other means or unfair methods of competition? If 'Yes', attach exhibit explaining circumstances.	( N ) <u>Yes</u> No
48) Is the applicant or any party directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If 'Yes', attach exhibit explaining circumstances.	( N ) <u>Yes</u> No

**49) Race, Ethnicity, and Gender of Applicant/Licensee (Optional):**

<b>Race:</b>	American Indian or Alaska Native:	Asian:	Black or African-American:	Native Hawaiian or Other Pacific Islander:	White:
<b>Ethnicity:</b>	Hispanic or Latino:	Not Hispanic or Latino:			
<b>Gender:</b>	Female:	Male:			

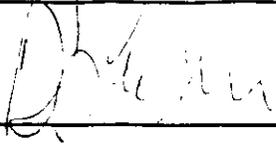
**General Certification Statements**

1) The applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application.
2) The applicant certifies that grant of this application would not cause the applicant to be in violation of any pertinent cross-ownership, attribution, or spectrum cap rule.  *If the applicant has sought a waiver of any such rule in connection with this application, it may make this certification subject to the outcome of the waiver request.
3) The applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.
4) The applicant certifies that neither the applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification.
5) The applicant certifies that it either (1) has a current Form 602 on file with the Commission, (2) is filing an updated Form 602 simultaneously with this application, or (3) is not required to file Form 602 under the Commission's Rules.

**Signature**

50) Typed or Printed Name of Party Authorized to Sign

First Name: Dennis	MI: L	Last Name: Erickson	Suffix:
-----------------------	----------	------------------------	---------

51) Title: VP Operations	
Signature: 	52) Date: 9/16/99

Failure To Sign This Application May Result In Dismissal Of The Application And Forfeiture Of Any Fees Paid

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

Wireless Telecommunications Bureau Schedule for  
Station Locations and Antenna Structures

1) Action Requested: ( <u>A</u> ) <u>Add</u> <u>Mod</u> <u>Del</u>		2) Location Number: <u>6</u>	
3) Location Description: <u>Fixed</u>	4) Area of Operation Code:	5) Location Name:	
6) FCC Antenna Structure Registration # or N/A (FAA Notification not Required)		<u>1058159</u>	
7) Latitude (DD-MM-SS.S): <u>38-56-42.0</u>	NAD83 ( <u>N</u> or <u>S</u> )	8) Longitude (DDD-MM-SS.S): <u>089-06-10.0</u>	NAD83 ( <u>W</u> ) <u>E</u> or <u>W</u>
9) Street Address, Name of Landing Area, or Other Location Description: <u>0.8 km S of</u>			
10) City: <u>Vandalia</u>	11) State: <u>IL</u>	12) County: <u>Fayette</u>	
13) Elevation of Site AMSL (meters) ( 'a' in antenna structure example ): <u>185.6</u>	14) Overall Ht AGL Without Appurtenances (meters) ( 'b' in antenna structure example ): <u>60.3</u>	15) Overall Ht AGL With Appurtenances (meters) ( 'c' in antenna structure example ): <u>60.6</u>	
16) Support Structure Type: <u>Tower</u>			
17) Location Number: (only for Area of Operation Code 'A')	18) Radius (km):	19) Airport Identifier:	20) Site Status:
21) Maximum Latitude (DD-MM-SS.S): Use for rectangle only (Northwest corner)	NAD83 ( ) <u>N</u> or <u>S</u>	22) Maximum Longitude (DDD-MM-SS.S): Use for rectangle only (Northwest corner)	NAD83 ( ) <u>E</u> or <u>W</u>
23) Do you propose to operate in an area that requires frequency coordination with Canada? ( <u>N</u> ) <u>Yes</u> <u>No</u>			
24) Description: (only for Area of Operation Code 'O')			
25) Number of Units: <u>    </u> Hand Held <u>    </u> Mobile <u>    </u> Temporary Fixed <u>    </u> Aircraft <u>    </u> Itinerant			
26) Would a Commission grant of Authorization for this location be an action which may have a significant environmental effect? See Section 1.1307 of 47 CFR. If 'Yes', submit an environmental assessment as required by 47 CFR, Sections 1.1308 and 1.1311. ( <u>N</u> ) <u>Yes</u> <u>No</u>			
27) If the proposed site is located in one of the quiet zones listed in Item 27 of the Instructions, provide the date the proper authority was notified:			

Technical Data Schedule for the  
Paging, Rural, Air-ground (General Aviation), and  
Offshore Radiotelephone Services (Part 22)

Control Points

1) Action A/M/D	2) Control Point Number	3) Location Street Address, City or Town, County, State	4) Telephone Number

Antenna Information

5) Action A/M/D	6) Location Number	7) Antenna Number	8) Height to Tip AGL (meters)	9) Height of Center of Radiation AAT (meters)	10) Beamwidth of Main Lobe (degrees)	11) Gain (dB)	12) Azimuth (degrees)
A	6	2	49	78	360	10	

Frequency Information

13) Action A/M/D	14) Location Number	15) Antenna Number	16) Channel Center Frequency (MHz)		17) Station Class	18) Maximum Transmitting ERP (watts)	19) Transmitter Output Power (watts)	20) Nonstandard Emission Designator
A	6	2	Existing (if mod)	New 928.9125	FXCT	50	11	
			Existing (if mod)	New				
			Existing (if mod)	New				
			Existing (if mod)	New				
			Existing (if mod)	New				
			Existing (if mod)	New				
			Existing (if mod)	New				

**Radial Data for Antennas**

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHZ)	25) RCHAAT (meters)	72	80	78	79	87	78	74	67
A	6	2	928.9125	26) ERP (watts)	50	50	50	50	50	50	50	50

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHZ)	25) RCHAAT (meters)								
				26) ERP (watts)								

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHZ)	25) RCHAAT (meters)								
				26) ERP (watts)								

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHZ)	25) RCHAAT (meters)								
				26) ERP (watts)								

					0°	45°	90°	135°	180°	225°	270°	315°
21) Action A/M/D	22) Location Number	23) Antenna Number	24) Frequency (MHZ)	25) RCHAAT (meters)								
				26) ERP (watts)								



CHECK NO. | CHECK DATE | VENDOR NO.  
234397 | 09/28/99 | F07025

**HOGAN & HARTSON L.L.P.**  
ATTORNEYS AT LAW  
555 13TH STREET, N.W.  
WASHINGTON, D.C. 20004

CHECK NO. 234397

NATIONS BANK  
WASHINGTON, D.C.

15-120  
540

CHECK AMOUNT

430.00

FOUR HUNDRED THIRTY AND 00/100

PAY  
TO THE FEDERAL COMMUNICATIONS  
ORDER OF COMMISSION

AMOUNTS OVER \$500. REQUIRE TWO SIGNATURES



AUTHORIZED SIGNATURE

⑈ 234397 ⑈ ⑆ 054001204⑆ 002086539194 ⑈