

ORIGINAL

PAUL, WEISS, RIFKIND, WHARTON & GARRISON

1615 L STREET, NW
TELEPHONE (202) 223-7300

WASHINGTON, DC 20036-5694
FACSIMILE (202) 223-7420

EX PARTE OR LATE FILED

1200 MONUMENT OF THE AMERICAS
LAW OFFICE, N.W. 1200
TELEPHONE (212) 373-3000
FACSIMILE (212) 757-3990

WRITER'S DIRECT DIAL NUMBER

(202) 223-7323

WRITER'S DIRECT E-MAIL ADDRESS

pscampbell@paulweiss.com

WRITER'S DIRECT FACSIMILE

(202) 223-7426

RECEIVED

NOV 9 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

62, RUE DU FAUBOURG SAINT-HONORÉ
75008 PARIS, FRANCE
TELEPHONE (33 1) 53 43 14 14
FACSIMILE (33 1) 53 43 00 23

FUKOKU SEIMEI BUILDING
2-2, UCHISAIWAICHO 2-CHOME
CHIYODA-KU, TOKYO 100-0011, JAPAN
TELEPHONE (81-3) 3597-8101
FACSIMILE (81-3) 3597-8120

2918 CHINA WORLD TOWER II
NO. 1 JIANGUOMENWAI DAJIE
BEIJING, 100004
PEOPLE'S REPUBLIC OF CHINA
TELEPHONE (86-10) 6505-6822
FACSIMILE (86-10) 6505-6830

12TH FLOOR, HONG KONG CLUB BUILDING
3A CHATER ROAD, CENTRAL
HONG KONG
TELEPHONE (852) 2536-9933
FACSIMILE (852) 2536-9622

November 9, 2000

By Hand Delivery

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals Building
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Notice -- WebLink Wireless, Inc.

GEN Docket No. 90-314, ET Docket No. 92-100/
Amendment of the Commission's Rules to Establish New Personal
Communications Services, Narrowband PCS

PP Docket No. 93-253
Implementation of Section 309(j) of the Communications Act -
Competitive Bidding, Narrowband PCS

Dear Ms. Salas:

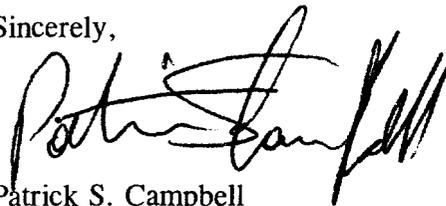
On November 9, 2000, Frederick Anderson, Douglas Glen and Jennifer Gaines of WebLink Wireless, Inc., and I met with: Roger Noel, Wilbert Nixon, Melvin Spann, and Sam Gumbert of the Wireless Telecommunications Bureau. The purpose of the meeting was to discuss the Commission's Second Report and Order and Second Further Notice of Proposed Rulemaking in the above-captioned proceedings. Based on the arguments summarized in the document attached hereto, WebLink is encouraging the Commission to use primarily Major Trading Areas as the geographic service areas for channelizing the NPCS spectrum to be auctioned.

We are submitting two copies of this notice in accordance with the Commission's Rules, for inclusion in the public record for the above-captioned proceedings. Please stamp and

Ms. Magalie Roman Salas

return the additional copy to confirm your receipt. Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick S. Campbell". The signature is fluid and cursive, with a large initial "P" and "C".

Patrick S. Campbell
Counsel for WebLink Wireless, Inc.

Attachment

cc: Roger Noel
Wilbert Nixon
Melvin Spann
Sam Gumbert

WebLink Wireless, Inc.
NPCS Licensing Proceeding

WebLink supports the PCIA band plan with respect to the sizing and pairing of channels for the NPCS spectrum to be auctioned. However, the PCIA plan goes too far by requesting the creation of primarily nationwide channels. For the following reasons, WebLink requests that the Commission affirm its well-reasoned decision in the Report & Order to create MTA licenses for the channelized NPCS spectrum, and apply the same reasoning to most of the reserve spectrum:

1. MTA-based licensing will promote viable, competitive NPCS businesses by serving the needs of both large and smaller carriers.
 - (a) Small carriers are better able to afford licenses based on smaller areas.
 - (b) Large carriers can aggregate licenses to create large service areas.
 - (c) Carriers desiring to augment their networks can do so efficiently.
 - (d) MTAs are large enough to support viable businesses.
2. MTA-based licensing will not cause spectrum coordination problems or undermine spectrum efficiency.
 - (a) The NPCS industry has the technical expertise and experience to ensure successful coordination, which has never proven to be a big problem.
 - (b) Guard band issues are basically the same for MTA, regional and nationwide licenses.
 - (c) Today's advanced wireless devices are able to handle smaller, adjacent service areas.
 - (d) The Commission has already implicitly decided that coordination is not a big issue.
3. MTA-based licensing should ensure healthy levels of competition in the spectrum auction by attracting a wide range of participants -- large, medium and small.
4. MTA-based licensing would minimize harm to carriers that have relied on the previous decision to license a significant portion of NPCS spectrum using smaller areas.
 - (a) Carriers such as WebLink have executed their business plans in reasonable reliance on the existence of licenses in smaller areas.
 - (b) A shift all the way from BTA licenses to primarily nationwide licenses will make it difficult for such carriers to augment their networks and support their customers.
5. The Commission could create additional nationwide licenses without disturbing the decision in the Report & Order to create MTA licenses in the channelized spectrum, by creating a small number of nationwide licenses in the reserve spectrum.