ORIGINAL

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

TO-QUYEN T. TRUONG
DIRECT DIAL 202-776-2058
ttruong@dlalaw.com

WASHINGTON, D.C.
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 FACSIMILE 202-776-2222

ONE RAVINIA DRIVE SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

February 22, 2001

EX PARTE OR LATE FILED

VIA HAND DELIVERY

RECEIVED

FEB 22 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: DA 00-2352 – Transfer of Motorola 900 MHz Licenses to Nextel
Notice of Written Ex Parte Communication

Dear Ms. Salas:

I am writing to inform you that on Thursday, February 22, 2001, Nextel Communications, Inc. submitted the attached letter to Ms. Lauren Kravetz, with copies to Ms. Monica Desai, Ms. Susan Singer and Mr. John Branscome, all of the Wireless Telecommunications Bureau.

Pursuant to Section 1.1206(b) of the Commission's rules, an original and one copy of this letter are being submitted to the Secretary's office for the above-captioned docket and a copy of this letter is being provided to the recipients of the submission. Should there be any questions regarding this tiling, please contact the undersigned.

Respectfully submitted,

To-Quyen Truong
Counsel for Nextel Communications, Inc.

Attachment

cc: Lauren Kravetz
Monica Desai
Susan Singer
John Branscome

No. of Copies rec'd 0+1
List A B C D E

Nextel Communications, Inc.
2001 Edmund Halley Drive, Reston, VA20191

NEXTEL

February 22, 2001

VIA HAND DELIVERY

Ms. Lauren Kravetz
Policy and Rules Branch
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Room 4-A 163
Washington, D.C. 20554

Re: Supplemental Submission Supporting Motorola Applications for Consent to Assign 900 MHz Licenses to Nextel -- DA 00-2352

Dear Ms. Kravetz:

Pursuant to a January 26, 2001 telephone conversation between Karen Kincaid, counsel to Motorola, Inc. ("Motorola"), and Monica Desai of the Policy and Rules Branch of the Commercial Wireless Division ("Division"), and as further clarified in a meeting between Nextel Communications, Inc. ("Nextel"), Motorola and Division staff the same day, the Division requested that Nextel and Motorola provide the following in support of their September 23, 2000 applications ("the Applications") to assign Motorola's 900 MHz licenses to Nextel subsidiary FCI 900, Inc.:

1. Submission of a waiver to the Department of Justice ("DOJ") that would allow the Federal Communications Commission ("Commission") to review information submitted by Nextel and Motorola in the Hart-Scott-Rodino ("HSR") filing at DOJ required for the above-referenced transaction;

2. January 31, 2001 updates of Attachments 1 and 2 to Exhibit B (the Public Interest Statement) of the Applications;

3. A list of any 800 MHz or 900 MHz systems that Nextel manages in the markets where Nextel and Motorola currently provide trunked dispatch services; and

4. A list of 220 MHz, 450 MHz and Automated Maritime Telecommunications Services ("AMTS") licensees providing trunked dispatch services in the markets where Nextel and Motorola currently provide trunked dispatch services, and the dates on which those services were launched.

In response to the Division's requests, on February 5, 2001, Nextel forwarded to Donald J. Russell of the Telecommunications Task Force at DOJ a letter waiving Nextel's confidentiality rights only as they pertain to information submitted by Nextel and Motorola in the HSR tiling for this transaction. This also will permit Commission staff to discuss the transaction with DOJ personnel. The waiver, however, does not permit Commission staff to copy records or other documents that are in the DOJ's possession. To the extent the Commission desires copies of any such materials, it has agreed to request copies directly from Nextel or Motorola.

With respect to Requests 2 and 3 above, Nextel is attaching to this letter (as Exhibit A) updated copies of Attachments 1 and 2 to the Public Interest Statement originally submitted on September 23, 2000.' These attachments have been updated as of January 31, 2001 to include any transactions Nextel has entered with 800 MHz and 900 MHz licensees since filing the Applications.[2] As explained in our January 26, 2001 meeting, Attachment 1 counts as "Nextel channels" those channels currently assigned to licensees with whom Nextel has pending transactions – *i.e.*, channels that Nextel is acquiring. Accordingly, the licensee associated with the pending transaction is not counted in Attachment 2 as a competitor in that geographic market. Similarly, the channel counts on Attachment 1 (in both the September 23, 2000 version and the attached updated version) include the channels of any licensee in the relevant geographic markets with whom Nextel currently has a management agreement. To ensure the most accurate picture of the 800 MHz and 900 MHz landscape in each market, therefore, Nextel has not included any of the managed licensees in Attachment 2.

With respect to the request for information about current dispatch operations provided on 220 MHz, 450 MHz and AMTS channels, Nextel has conducted searches on LEXIS/NEXIS and on the World Wide Web for such information, and has contacted certain licensees directly. As to 220 MHz operations, the January 22, 2001 edition of RCR Wireless News reports that Securicor Wireless, Inc. will deploy within the next live years a 220 MHz service in the top 60 markets in the U.S.[3] Nextel also has made inquiries to Securicor and was informed that it is currently providing 220 MHz services in Albany, NY; Allentown, PA; Bakersfield, CA; Boston, MA; Cleveland, OH; Dallas-Ft. Worth, TX; Des Moines, IA; El Paso, TX; Flint, MI; Harrisburg, PA; Hartford, CT; Houston, TX; Indianapolis, IN; Kansas City, MO; Knoxville, TN; Little Rock, AR; New Orleans, LA; Oxnard, Simi Valley, CA; Peoria, IL; Pittsburgh, PA; Richmond, VA;

---

[1] Attachment 2 is only updated with respect to 800 MHz and 900 MHz licensees in the relevant markets since these are the only licensees with whom Nextel has negotiated transactions since September 23, 2000.

[2] Because there is some lag time between Nextel's signing of an agreement to buy spectrum from another licensee and that transaction being reflected in the Commission's and Nextel's licensing databases, Nextel was unable to provide the attached information sooner. Additionally, because the Commission only updates its database every week, the information provided in Attachments 1 and 2 are updated as of February 3, 2001, the earliest date after January 3 1, 2001 that an update was available.

[3] RCR Wireless News, "Securicor Takes 220 MHz Path," January 22, 2001, at p. 6.

Sacramento, CA; Salt Lake City, UT; San Antonio, TX; San Francisco, CA; San Jose, CA; Tampa, FL; Wichita, KS; Los Angeles, CA; Miami, FL; Milwaukee, WI; Chicago, IL; New York City, NY; Rochester, NY; Buffalo, NY; Seattle, WA; Baltimore, MD; Minneapolis, MN; Birmingham, AL; Atlanta, GA; Orlando; FL; Norfolk, VA; Denver, CO; Columbus, OH; and Cincinnati, OH.

Additionally, as shown in the attached pleading of Securicor at Exhibit B, Securicor evidences its intentions to enhance its 220 MHz services through the secondary marketplace, if the Commission provides the necessary flexibility in its ongoing rulemaking proceeding regarding the efficient use of spectrum through secondary market transactions.[4] Exhibit B also includes information on the operations of Rush Network, a nationwide provider of 220 MHz wireless services. According to Rush Network, it has constructed systems in "49 cities across the country. . ."[5] Exhibit B contains information on Northwest Telecommunications Corporation, which states that it is the "largest provider of 220 MHz spectrum efficient radio service in the Pacific Northwest. . .[using a] system designed to provide Northwest Utilities with a common trunked radio dispatch system."[6] This system, however, is "now available to all other businesses and government agencies."[7]

With respect to dispatch services provided on AMTS channels, as explained in the Public Interest Statement supporting the transfer of Mobex Communications' ("Mobex") 800 MHz licenses to Nextel, submitted to the Commission on December 12, 2000, Mobex is shifting its focus to launching new commercial dispatch services on AMTS channels.[8] According to Mobex, its AMTS services are currently available on the West Coast, the East Coast, along the Mississippi River and its tributaries, and at the Gulf of Mexico.

Exhibit C hereto is a list of 450 MHz licensees in the relevant geographic markets that are authorized to provide competitive dispatch services. Each of the licensees listed therein is authorized to provide commercial trunked service, conventional service, and/or interconnected service and/or is licensed as a community repeater. As listed in the exhibit, each 450 MHz licensee is assigned a particular "Radio Service Code" and a "Class Station Code." These codes indicate whether the licensee is a commercial entity providing for-profit services, a private entity (*i.e.,* non-interconnected) offering for-profit services, or a private entity operating on a community repeater. For example, in Washington D.C., there are just over 50 licensees listed,

---

[4] *See In re Promoting Efficient Use of Spectrum Through Elimination of Barriers to the Development of Secondary Markets*, Notice Of Proposed Rulemaking, FCC 00-402 (released November 27, 2000)("Secondary Markets NPRM").

[5] See Exhibit B.

[6] *Id.*

[7] *Id.*

[8] Mobex is constructing, deploying and providing its AMTS dispatch services based in part on an investment by Nextel as part of the overall 800 MHz license transaction.

all of which are non-commercial, conventional licensees (IG Radio Service Code), but most of which are on a community repeater (FB4 Class Station Code). If a wireless user in the Washington D.C. area, therefore, desires an analog dispatch service, there appear to be opportunities for him to purchase radios; obtain a 450 MHz license and operate on existing community repeaters.' While Nextel cannot be sure how many users are currently served by these licensees, the fact is that the 450 MHz option is available in the relevant geographic markets. Thus, when Nextel integrates the Motorola 900 MHz licenses into its digital iDEN network, consumers desiring analog dispatch service rather than the wide-area digital dispatch services offered by Nextel have alternative analog dispatch options besides those available from 220, 800 and 900 MHz systems.

While Nextel recognizes that the above-requested information relates to the availability of dispatch services in the relevant geographic markets, Nextel reiterates herein that the Commission's analysis of the proposed transaction does not stop there. If, by requesting this information, the Division is attempting to determine whether there is any threat that consumer demand for dispatch services will exceed its supply if the proposed transaction is permitted, a count of the companies currently using the AMTS, 220,450, 800 or 900 MHz spectrum to provide traditional dispatch services does not provide an accurate answer to this question. Any statistics ostensibly proffered to show a decrease in the number of "traditional dispatch service providers" merely reflect the market reality that supply still far exceeds consumer demand for traditional dispatch services. Thus, carriers seeking to compete effectively must expand **beyond** dispatch service to satisfy growing consumer demand for additional services.

Consumers today demand an expanded menu of innovative service offerings, not just traditional dispatch services, as evidenced by the fact that 85% of Nextel's new subscribers are former cellular users that, to a large extent, are replacing interconnected mobile telephone service with Nextel's digital dispatch service.]' Significantly, no wireless customer has lodged a complaint with the Commission or opposed any of Nextel's spectrum acquisitions. This record is a testament to consumer satisfaction with the expansion of service offerings and competitive terms offered by Nextel as well as other wireless service providers. As the Bureau has recognized, proof that dispatch supply far exceeds consumer demand is provided by the continuing decline in real prices for dispatch services, with no prospect for reversal of the trend in sight, notwithstanding the consolidation among dispatch service providers."

---

[9] Nextel believes that the Commission's rules permit this type of third party dispatch service that already is used extensively throughout the country. Historically, there have been more dispatch users operating on community repeaters than operating on analog SMR systems.

[10] The Strategis Group, "The State of the SMR Industry: Nextel and Dispatch Communications," September 2000, at p. 49.

[11] *Applications of Geotek Communications Inc. et al., Assignors, and FCI 900, Inc., Assignee, for Consent to Assignment of 900 MHz Specialized Mobile Radio Licenses*, Memorandum Opinion and Order, 15 F.C.C.R. 790 at ¶ 41 (WTB 2000), *aff'd*, Order on Reconsideration, DA 01-51 (WTB, rel. Jan. 9, 2001) ("Geotek").

Section 3 10(d) requires a forward-looking analysis of the competitive effects of the proposed transfer, with specific focus on consumers' ability to obtain the services they desire at competitive prices. [12] As the Commission has recognized, far from imposing supra-competitive terms or limiting consumers' service choices, Nextel historically has pioneered the offering of pro-competitive pricing options and expanded, innovative services.[13] Even in a hypothetical scenario in which Nextel attempted to impose supra-competitive prices and terms for its services, there would be little threat of consumer harm because other firms would enter that market niche to compete away Nextel's excess profits – in contrast to the current situation where these firms have little incentive to enter due to the falling dispatch prices reflective of a glut of dispatch supply to meet consumer demand. These competing firms, moreover, can provide dispatch services over the 220 MHz and 450 MHz spectrum, the newly licensed 700 MHz Guard Band channels, the 700 MHz commercial allocation, 800 MHz General Category channels and potentially the 900 MHz Business and Industrial Land Transportation ("BI/LT") channels.[14]

Perhaps more significant is the fact that, if Nextel were attempting to charge supra-competitive prices for its services, cellular and personal communications services (PCS) providers certainly would not forego such an opportunity to win away Nextel's customers with their own group calling plans. As the Commission has recognized, intense competition from Nextel and similar new entrants have forced these carriers to offer increasingly competitive group calling plans to compete with the group functionality of dispatch service.[15] For example, a number of CMRS carriers offer special reduced rates for mobile-to-mobile calling – plans designed to compete directly with Nextel's Direct Connect Service.[16] Southwestern Bell Company's "Cellular One to One" service employs Ericsson technology to enable subscribers to

---

[12] *In re Matter of Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from Media One Group, Inc. to AT&T Corp.,* Memorandum Opinion and Order, FCC 00-202, 15 FCC Rcd 9816 (2000) at ¶ 12.

[13] Geotek, 15 F.C.C.R. 790 at ¶ 47.

[14] See Report and Order and Further Notice of Proposed Rulemaking, FCC 00-403, released November 9, 2000. Notably, Southern Company, which argues that the relevant market for analysis of this transaction is dispatch service provided over the 19 MHz in the 800 MHz and 900 MHz specifically allocated to SMR services, itself provides SMR service almost exclusively over ***non-SMR*** 800 MHz channels. Comments of Southern Company, PR Docket No. 93-144, at p. 5 (filed March 27, 2000)(It is "crystal clear that the Southern LINC system is composed of more than 95% converted BI/LT channels.")

[15] *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services,* Fifth Report, 15 F.C.C.R. 17660, at p. 71 (2000) ("Fifth Report on Competition").

[16] See Letter from Laura Holloway, Director of Government Affairs, Nextel Communications, Inc. to Susan Singer, Economist, FCC Wireless Telecommunications Bureau, Commercial Wireless Division (Dec. 13, 2000) listing representative unlimited mobile-to-mobile calling plans offered by cellular and PCS carriers.

make conference calls with up to thirty different parties.[17] Additionally, Qualcomm is offering a new Q-Chat product that provides mobile push-to-talk one-to-many dispatch functionality over cellular and PCS networks – a direct response to Nextel's Direct Connect service functionality."[18] These spectrum and resource rich cellular and PCS competitors are poised to win away Nextel's customers at the first sign of any relaxation in Nextel's practice of offering an expanding array of mobile communications services on highly competitive prices and terms.

This rigorous competition in the CMRS marketplace, including increasing pressure from the group-calling offerings of large CMRS carriers such as Sprint PCS, AT&T Wireless, and Cingular, is the driver behind Nextel's spectrum acquisitions. Nextel's acquisition of Motorola's 900 MHz SMR licenses is a direct response to the wireless industry's convergence into a single CMRS market where carriers – regardless of their original spectrum holdings (cellular, PCS, paging or SMR) – no longer can limit their offerings solely to traditional dispatch service or to mobile phone service, but instead must move toward offering an expanding menu of dispatch, paging, two-way messaging, Internet access, and mobile phone services to satisfy evolving consumer demand. Consumers do not limit themselves to historical service offerings,[19] nor do they purchase mobile communications services based on carriers' spectrum classifications. Similarly, the Commission should not limit its public interest analysis to such historical service offerings and spectrum classifications.

Regardless of whether the 900 MHz spectrum that Nextel seeks to acquire currently is used only to provide dispatch services, the Commission licensed this spectrum for the provision of a variety of services beyond traditional dispatch, including wide-area mobile voice and data services.[20] It would be ironic indeed – and directly contrary to the public interest – for the Commission to prevent an innovative company such as Nextel from acquiring spectrum to provide both stand-alone dispatch service and the advanced mobile communications services desired -- indeed demanded -- by consumers today, in favor of limiting the spectrum to yesterday's traditional dispatch use for which (as discussed above) consumers face no threat of supra-competitive pricing and terms. This result would be contrary to the Commission's stated

---

[17] Fifth Report on Competition at p. 71; Geotek at ¶ 37.

[18] See Press Release, Qualcomm, "Solution by Descartes and Qualcomm Improves Communications and Smoothes Logistics for Private Fleets, Less-than-Truckload Carriers and Metropolitan Fleets" (June 15, 2000), www.qualcomm.com.

[19] See, e.g., The Strategis Group, "U.S. Dispatch Markets," January 2000, at p. 85 (because "mobile data service providers are offering increasingly sophisticated fleet management, automated scheduling, and dispatch communications capabilities[, s]ome radio users have reportedly selected commercial wireless data services for their dispatch communications needs").

[20] *Implementation of Sections 3(n) and 332 of the Communications Act*, Third Report and Order, 9 F.C.C.R. 7988, 8009 at ¶ 113 (1994) ("CMRS Third Report & Order); Geotek, 15 F.C.C.R. 790 at ¶ 25.

mission to achieve "[m]ore intensive use of spectrum that is already licensed but is underutilized or inefficiently utilized . . .."[21]

I hope this information is helpful- to the Commission in reviewing the pending Nextel and Motorola Applications. As discussed above, the proposed assignment of Motorola's 900 MHz licenses to Nextel will benefit American consumers through the provision of new service offerings, additional capacity, and increased competition in the CMRS market. Please do not hesitate to contact us if we can provide any further information or assistance in your review of this transaction.

Respectfully submitted,

Laura Holloway/TQT

Laura L. Holloway
Director-Government Affairs

cc: Monica Desai
Susan Singer
John Branscome

[21] Secondary Markets NPRM at ¶ 8.

EXHIBIT A

UPDATED ATTACHMENTS 1 AND 2
TO THE SEPTEMBER 23, 2000 PUBLIC INTEREST STATEMENT

ATTACHMENT 1 TO
NEXTEL-MOTOROLA PUBLIC INTEREST STATEMENT
UPDATED AS OF FEBRUARY 3, 2001

Markets and Channel Counts

Market Name 1/	Nextel 800 MHz 2/	Nextel 900 MHz 2/, 3/	Motorola 900 MHz 4/, 5/	Commercial Service Actively Marketed by Both Parties?
New York, NY	323	70	20	Yes
Los Angeles, CA	347	100	20	Yes
San Diego, CA	160	50	30	
Chicago, IL	334	80	IO	Yes
San Francisco, CA	314	85	30	Yes
Detroit, MI	285	100	IO	Yes
Charlotte, NC	353	140	10	Yes
Dallas, TX	398	80	20	Yes
Boston, MA	403	20	0	
Philadelphia, PA	374	60	30	Yes
Washington, DC	324	80	20	Yes
Atlanta, GA	290	90	IO	Yes
Minneapolis, MN	367	170	0	
Tampa, FL	379	50	20	Yes
Houston, TX	379	90	25	Yes
Miami, FL	390	30	0	
Cleveland, OH	245	110	IO	No
New Orleans, LA	309	160	0	No
Cincinnati, OH	368	170	0	
Saint Louis, MO	376	120	0	
Milwaukee, WI	404	150	0	
Pittsburgh, PA	419	160	0	
Denver, CO	360	50	0	
Richmond, VA	421	160	10	No
Seattle, WA	261	50	0	
Puerto Rico	142	110	0	
Louisville, KY	403	140	0	
Phoenix, AZ	359	100	0	
Memphis, TN	382	150	IO	No
Birmingham, AL	304	170	0	
Portland, OR	369	160	0	
Indianapolis, IN	318	170	0	
Des Moines, IA	322	90	0	
San Antonio, TX	397	130	0	
Kansas City, KS	344	100	0	
Buffalo, NY	136	40	0	No
Salt Lake City, UT	365	100	10	No
Jacksonville, FL	408	120	IO	No
Columbus, OH	394	140	20	Yes
El Paso, TX	172	90	0	
Little Rock, AR	328	130	0	
Oklahoma City, OK	401	190	0	

Spokane, WA	384	120	0	
Nashville, TN	393	140	0	
Knoxville, TN	323	140	0	
Omaha, NE	315	110	0	
Wichita, KS	434	110	IO	Yes
Honolulu, HI	210	140	0	
Tulsa, OK	395	190	0	
Anchorage, AK	75	190	0	

1/ The above markets represent the primary cities of the top 50 MTAs within the US.

2/ Channel counts include those for which there are sales to Nextel which are pending.

3/ These channel counts represent the number of channels that are useable by Nextel in the urbanized area for the referenced market and thus do not include any channels for which there exists a DFA license in the referenced market which is not owned by Nextel.

4/ These channel counts represent the number of channels that are useable by Motorola in the urbanized area for the referenced market and thus do not include any channels for which there exists a DFA license in the referenced market which is not owned by Motorola.

5/ Motorola's 900 MHz channels counts in certain markets differ slightly from the counts provided in the September 23, 2000 Attachment 1. In San Diego, the earlier attachment failed to account for 20 channels assigned to Motorola, thus the total channel count for Motorola is (and should have been) 30 in San Diego. In Dallas, Motorola now has 20 channels because an underlying DFA license has expired resulting in an additional five channels to Motorola as the MTA licensee. In Buffalo, Motorola should not have been attributed any channels because the underlying DFA channels on which Motorola is licensed cover Canadian channels that cannot be used in the U.S. In Wichita, Motorola has been credited with ten channels because it holds the underlying DFA license therein. These IO channels were inadvertently omitted from the earlier filing.

ATTACHMENT 2 TO
NEXTEL-MOTOROLA PUBLIC INTEREST STATEMENT
UPDATED AS OF FEBRUARY 3, 2001

900 MHz Site Licensees
as of February 3, 2001

Market Name	Entity
Atlanta, GA	REESE TELECOMMUNICATIONS INC
Baltimore, MD	BELLSOUTH WIRELESS DATA LP
Baltimore, MD	FIVE APPLES INC
Baltimore, MD	G & G COMMUNICATIONS INC
Baltimore, MD	MOBILECALL INC
Chicago, IL	BELLSOUTH WIRELESS DATA LP
Chicago, IL	CONXUS SPECTRUM INC
Chicago, IL	THESS, PAT
Chicago, IL	VBI INC
Cleveland, OH	'BELLSOUTH WIRELESS DATA LP
Columbus, OH	BELLSOUTH WIRELESS DATA LP
Dallas, TX	COMMUNICATIONS LICENSE HOLDINGS I INC
'Dallas, TX	EVEREST DALLAS CHANNELS INC
'Detroit, Ml	BELLSOUTH WIRELESS DATA LP
Houston, TX	CONXUS SPECTRUM INC
Los Angeles, CA	CONXUS COMMUNICATIONS INC
Los Angeles, CA	KLEINE, PAUL W:KLEINE, ROBERT J
New York, NY	BELLSOUTH WIRELESS DATA LP
New York, NY	G & G COMMUNICATIONS INC
New York, NY	SCHROLL, LAWRENCE C
New York, NY	TYLER, RUTH N:TYLER, CHARLES R
Philadelphia, PA	BELLSOUTH WIRELESS DATA LP
Philadelphia, PA	G & G COMMUNICATIONS INC
Philadelphia, PA	JAN INDUSTRIAL
Philadelphia, PA	TYLER, RUTH N:TYLER, CHARLES R
Salt Lake City, UT	HEYWOOD ENGINEERING'S, CONSULTANTS
San Diego, CA	FISHER WIRELESS SERVICES INC
San Diego, CA	JANSSEN, KATHLEEN
San Francisco, CA	HERNANDEZ, DAVID A
Tampa, FL	BELLSOUTH WIRELESS DATA LP
Tampa, FL	CELSMER
Tampa, FL	CUTTER INVESTMENTS INC
Tampa, FL	GEM ELECTRONICS OF MONMOUTH INC
Tampa, FL	'HOWARD, GLENN
Tampa, FL	HOWARD, KEVIN B
Tampa, FL'	RADIO ONE INC
Washington, DC	BELLSOUTH WIRELESS DATA LP
'Washington,. DC	'FIVE APPLES INC
Washington, DC	MOBILECALL INC

900 MHz MTA Licensees
As of February 3, 2001

Market	Licensee
New York	Cingular Interactive L.P.
New York	Neoworld License Holdings, Inc.
Los Angeles-San Diego	Cingular Interactive L.P.
Los Angeles-San Diego	Paul W Kleine; Robert J Kleine
Chicago	Cingular Interactive L.P.
Chicago	Neoworld License Holdings, Inc.
San Francisco-Oakland-San Jose	Cingular Interactive L.P.
San Francisco-Oakland-San Jose	Neoworld License Holdings, Inc.
Detroit	Cingular Interactive L.P.
Detroit	Neoworld License Holdings, Inc.
Detroit	SGI COMMUNICATIONS INC
Charlotte-Greensboro-Greenvill	Cingular Interactive L.P.
Charlotte-Greensboro-Greenvill	MORRIS COMMUNICATIONS INC
Dallas-Fort Worth	Cingular Interactive L.P.
Dallas-Fort Worth	COMMNET COMMUNICATIONS NETWORK INC
Dallas-Fort Worth	EVEREST COMMUNICATIONS INC & CAPITAL TWO WAY COMMUNICATIONS INC
Dallas-Fort Worth	LANCASTER COMMUNICATIONS INC
Dallas-Fort Worth	Neoworld License Holdings, Inc.
Philadelphia	Cingular Interactive L.P.
Philadelphia	Neoworld License Holdings, Inc.
Philadelphia	SGI COMMUNICATIONS INC
Washington-Baltimore	Cingular Interactive L.P.
Washington-Baltimore	MOBILECALL INC
Washington-Baltimore	Neoworld License Holdings, Inc.
Atlanta	Cingular Interactive L.P.
Atlanta	COMMNET COMMUNICATIONS NETWORK INC
Atlanta	Neoworld License Holdings, Inc.
Atlanta	SGI COMMUNICATIONS INC
Tampa-St Petersburg-Orlando	CELSMER
Tampa-St Petersburg-Orlando	Cingular Interactive L.P.
Tampa-St Petersburg-Orlando	Neoworld License Holdings, Inc.
Tampa-St Petersburg-Orlando	SGI COMMUNICATIONS INC
Houston	Cingular Interactive L.P.
Houston	Neoworld License Holdings, Inc.
Cleveland	Cingular Interactive L.P.
Cleveland	CLEVELAND MOBILE RADIO SALES INC
Cleveland	INDEPENDENCE EXCAVATING INC INDEPENDENCE COMMUNICATIONS
Cleveland	SGI COMMUNICATIONS INC
Richmond-Norfolk	Cingular Interactive L.P.
Richmond-Norfolk	SGI COMMUNICATIONS INC
Memphis-Jackson	ADVANCED COMMUNICATION SOLUTIONS INC
Memphis-Jackson	Cingular Interactive L.P.
Memphis-Jackson	SGI COMMUNICATIONS INC
Salt Lake City	Cingular Interactive L.P.
Salt Lake City	CSS COMMUNICATIONS CO
Salt Lake City	RADIO COMMUNICATIONS SERVICE INC
Jacksonville	AMERICAN NATIONAL COMMUNICATIONS COMPANIES INC

Jacksonville	Cingular Interactive L.P.
Jacksonville	POWER TALK NORTH FLORIDA LTD
Jacksonville	RAPID WIRELESS LTD
Columbus	Cingular Interactive L.P.
Columbus	CLEVELAND MOBILE RADIO SALES INC
Columbus	SGI COMMUNICATIONS INC
Wichita	Cingular Interactive L.P.
Wichita	VoiceStream SMR Corporation

800 MHz Site Licensees
as of February 3, 2001

Market Name	Entity
Atlanta, GA	ALLEN, DAVID M
Atlanta, GA	C&S COMMUNICATIONS INC
Atlanta, GA	COXWELLS COMMUNICATIONS INC
Atlanta, GA	FEAMSTER, PETER
Atlanta, GA	HAROLD HILLIARD
Atlanta, GA	HILLIARD, HAROLD
Atlanta, GA	MORRIS COMMUNICATIONS INC
Atlanta, GA	MOTIENT COMMUNICATIONS COMPANY
Atlanta, GA	SOUTHERN COMMUNICATIONS SERVICES INC
Atlanta, GA	STONE MOUNTAIN PARK
Baltimore, MD	ACADEMY BUS
Baltimore, MD	ADLER, PHILIP
Baltimore, MD	ATLANTIC CITY ELECTRIC COMPANY
Baltimore, MD	COMMUNICATION SYSTEMS SPECIALISTS INC
Baltimore, MD	COMMUNICATIONS ELECTRONICS INC
Baltimore, MD	FRANCIS 0 DAY CO INC
Baltimore, MD	GOUGHNOUR, JUDITH L
Baltimore, MD	'KOCH, GEORGE P JR & KATHERINE B
Baltimore, MD	MAGNUM ELECTRONICS
Baltimore, MD	MOTIENT COMMUNICATIONS COMPANY
Baltimore, MD	TRANSCRIPT INC
Baltimore, MD	TRIANGLE COMMUNICATIONS INC
Baltimore, MD	WALTON, RICHARD
Buffalo, NY	CHAMPION
Buffalo, NY	INFORMATION TRANSFER SYSTEMS
Charlotte, NC	ALLEN, CAROL J
Charlotte, NC	ALLEN, DAVID M
Charlotte, NC	ALLEN, EUGENE M
Charlotte, NC	'AMBROSE, EUGENE K
Charlotte, NC	BEACHAM, MIKE A
Charlotte, NC	BETTY QUICK DBA ADVANCED COMMUNICATIONS TECHNOLOGY
Charlotte, NC	'CAROLINA C & E INC
Charlotte, NC	COLUMBIA TOWER CORPORATION
Charlotte, NC	'DUKE POWER
Charlotte, NC	FCCA LLC
Charlotte, NC	HARRIS, JOHN W
Charlotte, NC	HARRISON', BERARD
Charlotte, NC	KOMOROWSKI, JOHN W
Charlotte, NC	'MC PHILLIPS, J VINCENT

Charlotte, NC	MORRIS COMMUNICATIONS INC
Charlotte, NC	
Charlotte, NC	REISENWEAVER COMMUNICATIONS INC
Charlotte, NC	SHUTT, JIM
Charlotte, NC	SMR OF COLUMBIA LLC
Charlotte, NC	SOUTH SALES COMMUNICATIONS INC
Charlotte, NC	STEWART JR, JAMES M
Charlotte, NC	STEWART, BENJAMIN D
Charlotte, NC	STRICKLAND, R G
Charlotte, NC	VARN, ALICE M
Charlotte, NC	WRIGHT, KATHY S
Charlotte, NC	ZARINS, EMILY
Charlotte, NC	ZARINS, RAYMOND K
Chicago, IL	AIRTIME SMR LLC
Chicago, IL	ARDIS COMPANY
Chicago, IL	BADALI, AUGUST D.
Chicago, IL	BATSON, JOSEPH B
Chicago, IL	BOULAIS, RICHARD DBA PRIVATE LINE COMMUNICATIONS CO
Chicago, IL	CHAMPION COMMUNICATION SERVICES INC
Chicago, IL	CHICAGO EQUIPMENT COMPANY INC
Chicago, IL	COOK ILLINOIS CORPORATION DBA ALPHA BUS SERVICE
Chicago, IL	COOK ILLINOIS CORPORATION DBA CHICAGO SCHOOL TRANSIT
Chicago, IL	COOK ILLINOIS CORPORATION DBA LIBERTY BUS COMPANY
Chicago, IL	COOK ILLINOIS CORPORATION DBA WESTWAY COACH
Chicago, IL	DUNCAN, GORDON L
Chicago, IL	E S P LEASING CORPORATION
Chicago, IL	EDGAR ELECTRIC COOPERATIVE ASSOC INC
Chicago, IL	HOUGH, ELAINE L
‘Chicago, IL	ILLINOIS COOPERATIVE ASSOCIATION INC DBA CLEAR TALK
Chicago, IL	JOLIET SMR INC
‘Chicago, IL	MOTIENT COMMUNICATIONS COMPANY
Chicago, IL	OLSON, DONNA J
Chicago, IL	R & W TECHNOLOGIES INC
Chicago, IL	REPEATER RENTALS OF IL AND INDIANA INC”
Chicago, IL	SEABERG, ROBERT W
Chicago, IL	SHEARER COMMUNICATONS INC
Chicago, IL	‘TELECOM INC
Chicago, I L	VANCOM INC DBA VANCOM LAIDLAW INC
‘Chicago, IL	VERACON CORPORATION
‘Chicago, IL	VIGNALI, MATTHEW’S ...”
Chicago, IL	WARDEN, JACK D
Cleveland, OH	STALEY TECHNOLOGIES INC
‘Columbus, OH	DON BENDER ELECTRONICS
“Columbus, OH	ELECTROCOMM COLUMBUS CORP
Columbus, OH	KETTERING COMMUNICATIONS INC
Columbus, OH	REEVES REALTY INC

Columbus, OH	WOLFS
Dallas, TX	ALLEN WIRELESS GROUP
Dallas, TX	ANDERSON, CHARLES
Dallas, TX	BELLAR COMMUNICATIONS CO
Dallas, TX	BELLAR TWO WAY
Dallas, TX	BELLAR, R J
Dallas, TX	
Dallas, TX	CLEAR CALL COMMUNICATIONS INC
Dallas, TX	COMMUNICATIONS RELAY INC
Dallas, TX	
Dallas, TX	DELTA COMMUNICATIONS
Dallas, TX	DLB ENTERPRISES INC DBA METROPLEX TWO WAY
Dallas, TX	FORT WORTH TRUNKED RADIO LP
Dallas, TX	HELMSCO INC
Dallas, TX	MORRIS COMMUNICATIONS INC
Dallas, TX	MOTIENT COMMUNICATIONS COMPANY
Dallas, TX	NETLINK RADIO COMMUNICATIONS INC
Dallas, TX	0 CONNOR, DAVID J
Dallas, TX	SELF RADIO INC
Detroit, MI	CONSUMERS ENERGY COMPANY
Detroit, MI	LOUCHART ENTERPRISES LLC
Detroit, MI	LOUCHART, DENNIS:LOUCHART, DONNA DBA LOUCHART ENTERPRISES
Houston, TX	ALLEN, DAVID M
Houston, TX	BAYTOWN COMMUNCIATIONS, INC
Houston, TX	CHATEL, LIONEL
Houston, TX	CLAY, FINNEY M
Houston, TX	D & G COMMUNICATIONS INC
Houston, TX	DAVIS, JAMES B
Houston, TX	F M COMMUNICATIONS INC
Houston, TX	FAUST DISTRIBUTING COMPANY INC
Houston, TX	HOT SHOT DELIVERY INC
Houston, TX	JAE COMMUNICATIONS CORPORATION
Houston, TX	JOHNSON, CHRISTIAN L
Houston, TX	MACHEMEHL, PAUL
Houston, TX	MAGNOLIA COMMUNICATIONS
Houston, TX	MOBILRADIO INC
Houston, TX	MOTIENT COMMUNICATIONS COMPANY
Houston, TX	PETROLEUM COMMUNICATIONS INC
Houston, TX	RADIO COMMUNICATIONS ASSOCIATION
Houston, TX	REPEATER COMMUNICATIONS CORPORATION
Houston, TX	SERVICE COMPANY
Houston, TX	TEXAS LICENSE CONSULTANTS
Houston, TX	TOWER COMMUNICATIONS INC
Houston, TX	WESTSIDE COMMUNICATIONS INC
Los Angeles, CA	A 1 A REPEATER COMPANY
Los Angeles, CA	APPLIED TECHNOLOGY GROUP INC

Los Angeles, CA	AUTOMOBILE TRANSPORT CO OF CALIFORNIA
Los Angeles, CA	DOERING, JIM
Los Angeles, CA	DUNDAS, WILLIAM H
Los Angeles, CA	GLENDALE ELECTRONICS INC
Los Angeles, CA	HAFNER, CARL J
Los Angeles, CA	'KING, BEVERLY
Los Angeles, CA	MAGNUM COMMUNICATIONS INC
Los Angeles, CA	MOBILE RADIO SERVICE INC
Los Angeles, CA	MOBILE RELAY ASSOCIATES
Los Angeles, CA	MOBILE UHF INC
Los Angeles, CA	MOTIENT COMMUNICATIONS COMPANY
Los Angeles, CA	PACIFIC WIRELESS TECHNOLOGIES INC.
Los Angeles, CA	PETRONE, DONALD L
Los Angeles, CA	SANDOVAL, RON
Los Angeles, CA	SOBEL, MARC
Los Angeles, CA	TELEPHONE CONNECTION OF LOS ANGELES INC
Los Angeles, CA	UPLINK INC
Los Angeles, CA	USA WASTE OF CALIFORNIA, INC.
Los Angeles, CA	X W CORPORATION
Memphis, TN	ALLEN, DAVID M
Memphis, TN	CASH, RICK
Memphis, TN	CORDTZ, MARGOT
Memphis, TN	DRAKE, JAMES L
Memphis, TN	HAFNER, CARL J
Memphis, TN	JONES, HARRY W
Memphis, TN	'MO ARK MOBILEPHONE INC
Memphis, T N	NORTH MS TWO WAY COMM INC
Memphis, TN	SMITH, DONNA W
Memphis, TN	SOUTHERN COMPANY
Memphis, TN	-WEST TENNESSEE COMMUNICATIONS
Memphis, TN	YOUNG, CHRIS:PASCHALL, LARRY A
New York, NY	ACADEMY BUS
New York, NY	"'ACADEMY EXPRESS INC
New York, NY	ADLER, PHILIP
New York, NY	'ALLEN, CAROL J
New York, NY	ALLEN, DAVID M
New York, NY	ALLEN, DON
New York, NY	ARDIS COMPANY
New York NY	ATLANTIC CITY ELECTRIC COMPANY
New York, NY	ATLANTIC TELECOMMUNICATIONS
New York, NY	COLUCCI, JENNIFER
New York, NY	COLUCCI, PETER S
'New York, NY	'CONCORD LIMOUSINE INC
New York, NY	*ELITE LIMOUSINE PLUS INC
New York, NY	LICOM COMMUNICATIONS
New York, NY	MID STATE "MOBILE RADIO

New York, NY	MOTIENT COMMUNCATIONS COMPANY
New York, NY	NEW YORK COMMUNICATIONS CO INC
New York, NY	NORCOM COMMUNICATIONS CORP
New York, NY	OROSZ, JOSEPH P
New York, NY	SCHMIDT, MICHAEL W
New York, NY	WOLDANSKI, PAUL F
Philadelphia, PA	ACADEMY BUS
Philadelphia, PA	ADLER, PHILIP
Philadelphia, PA	ARDIS COMPANY
Philadelphia, PA	ATLANTIC CITY ELECTRIC COMPANY
Philadelphia, PA	CONCORD LIMOUSINE INC
Philadelphia, PA	DETWEILER, SCOTT R
Philadelphia, PA	LICOM COMMUNICATIONS
Philadelphia, PA	MAGNUM ELECTRONICS
Philadelphia, PA	MID STATE MOBILE RADIO
Philadelphia, PA	MOTIENT COMMUNICATIONS COMPANY
Philadelphia, PA	SCHMIDT, MICHAEL W
Philadelphia, PA	WALTON, RICHARD
Philadelphia, PA	WOLDANSKI, PAUL F
Richmond, VA	A R C INC DBAANTENNA RENTALS CORPORATION
Richmond, VA	A.R.C. INC
Richmond, VA	ALLEN, CYNTHIA B
Richmond, VA	ALLEN, DAVID M
Richmond, VA	ALLEN, DONALD A
Richmond, VA	ANTENNA RENTALS CORPORATION
Richmond, VA	ANTENNA SITE RENTALS, INC.
Richmond, VA	COMMERCIAL RADIO SERVICE CORP
Richmond, VA	COMMERCIAL RADIO SERVICE CORPORATION
Richmond, VA	COMMERCIAL RADIO SERVICES CORP
Richmond, VA	FERRILL, CHRIS A
Richmond, VA	FRANCIS 0 DAY CO INC
Richmond, VA	FRANS, HOWARD R --
Richmond, VA	HENDERSON, HENRY B
Richmond, VA	KOCH, GEORGE P JR & KATHERINE B
Richmond, VA	MORA, ALBERT M
Richmond, VA	MOTIENT COMMUNICATIONS COMPANY
Richmond, VA	SHAW, C GRANT
Richmond, VA	ZARINS, DIANE C
Richmond, VA	ZARINS, EMILY
Richmond, VA	ZARINS, RAYMOND KENNETH
Rochester, NY	CHAMPION
Rochester, NY	MOTIENT COMMUNICATIONS COMPANY
Salt Lake City, UT	ALLIANT AEROSPACE C O
Salt Lake City, UT	ARDIS COMPANY
Salt Lake City, UT	BRIAN LEIFSON
Salt Lake City, UT	DENKERS, LYNN H

Salt Lake City, UT	DOMIN, INGRID A
Salt Lake City, UT	FORD, MICHEAL
Salt Lake City, UT	HERBY, CLINTON
Salt Lake City, UT	HEYWOOD, ROGER D
Salt Lake City, UT	JOHN LOCKWOOD
Salt Lake City, UT	LEIFSON, BRIAN
Salt Lake City, UT	LOCKWOOD, JOHN
Salt Lake City, UT	LYON, MAURICE C
Salt Lake City, UT	QUESTAR
Salt Lake City, UT	RADIO COMMUNICATIONS INC
Salt Lake City, UT	SMR OF UTAH INC
Salt Lake City, UT	WIRELESS ADVANTAGE LLC
San Diego, CA	DOERING, JIM
San Diego, CA	GLENDALE ELECTRONICS INC
San Diego, CA	JLC COMMUNICATIONS SITES
San Diego, CA	KING, BEVERLY
San Diego, CA	MOBILE RADIO SERVICE INC
San Diego, CA	MOBILE UHF INC
San Diego, CA	MOTIENT COMMUNICATIONS COMPANY
San Diego, CA	PALOMAR COMMUNICATIONS INC
San Diego, CA	SOBEL, MARC
San Diego, CA	TELEPHONE CONNECTION OF LOS ANGELES INC
San Diego, CA	UPLINK INC
San Diego, CA	USA WASTE OF CALIFORNIA, INC.
San Diego, CA	WESTERN WIRELESS
San Diego, CA	X W CORPORATION
San Francisco, CA	ANDERSON, KEVIN A
San Francisco, CA	ARDIS COMPANY
San Francisco, CA	B & 0 RADIO & TELEPHONE SYSTEMS INC
San Francisco, CA	B&O RADIO & TELEPHONE SYSTEMS INC
San Francisco, CA	BUTLER, JOHN:BUTLER, MARY DBA M B SITE RENTALS
San Francisco, CA	CHAMPION COMMUNICATION SERVICES INC
San Francisco, CA	CROSS, B J
San Francisco, CA	FISHER WIRELESS SERVICES INC
San Francisco, CA	FRESNO MOBILE RADIO INC
San Francisco, CA	GARLAND, DONALD R:GARLAND, LINDA L DBA NAPA VALLEY COMMUNICATIONS
San Francisco, CA	GRANITE CONSTRUCTION INC
San Francisco, CA	HERNANDEZ, DAVID
San Francisco, CA	HERNANDEZ, DAVID A
San Francisco, CA	JOSEPH J ALBANESE INC
San Francisco, CA	L A PAGE CORP
San Francisco, CA	LA RUE JR, KNOX
San Francisco, CA	LA RUE JR, KNOX DBA LARUE COMMUNICATIONS
San Francisco, CA	LARUE COMMUNICATIONS
San Francisco, CA	MAGGIO, LARRY G
San Francisco, CA	MID VALLEY COMMUNICATIONS

San Francisco, CA MOTIENT COMMUNICATIONS COMPANY
San Francisco, CA PACIFIC WIRELESS TECHNOLOGIES INC.
San Francisco, CA RODRIGUEZ, ROBERT
San Francisco, CA SUPER SHUTTLE INTERNATIONAL
San Francisco, CA TEN FOUR COMMUNICATIONS INC
San Franc&o, CA WATERSIDE MANAGEMENT CORP
San Francisco, CA WESTCOMM EQUIPMENT INC
San Francisco, CA WESTERN TELEPHONE ANSWERING SERVICE
San Francisco, CA WHITNEY, MARK:WHITNEY, DEVONA
Tampa, FL ALPHATRONICS INC:DANIELS, JERRY:BURKE, JOSH D DBA BDH ENTERPRISES
Tampa, FL ARDIS COMPANY
Tampa, FL ASHLEY, JOHN W
Tampa, FL BREWER, L D
Tampa, FL BROWN, DAWN
Tampa, FL BUSHNELL UTILITY COMPANY INC
Tampa, FL CHATCO COMMUNICATIONS INC
Tampa, FL CHATTAWAY, PAUL S
Tampa, FL EVERGREEN CEMETARY CO INC
Tampa, FL LILLY, ROSALENE J
Tampa, FL' MEARS COMMUNICATIONS CO
Tampa, FL MOTIENT COMMUNICATIONS COMPANY
Tampa, FL TRI CO COMMUNICATIONS
Tampa, FL WIRELESS TECHNOLOGY EQUIPMENT COMPANY, INC.
Tampa, FL WOOD, LINDA M
Washington, DC ACADEMY BUS
Washington, DC CELCO SND COMM INC
Washington, DC COMMUNICATION SYSTEMS SPECIALISTS INC
Washington, DC COMMUNICATIONS ELECTRONICS INC
Washington, DC FRANCIS 0 DAY CO INC
Washington, DC GOUGHNOUR, JUDITH L
Washington, DC KOCH, GEORGE P JR & KATHERINE B
'Washington, DC MAGNUM ELECTRONICS
Washington, DC M O T I E N T COMMUNICATIONS C O M P A N Y
Washington, DC SHAW, C GRANT"
Wichita, KS ALLEN, DAVID M
Wichita, KS CLARUS COMMUNICATIONS LLC
Wichita, KS CONDUFF, ARCHIE
Wichita, KS' 'ESTATE OF JOSEPH C THAMES
Wichita,, KS FISCHER, CRAIG D
Wichita, KS KACOMM INC
Wichita, KS MOBILE ELECTRONICS INC
Wichita, KS 'SMOCK, GENE A
Wichita, KS TOTAL COM INC

EXHIBIT B

INFOFWIATION REGARDING 220 MHZ OPERATIONS

about rush
what is 220mhz?
our technology
our products
US coverage map
FCC regulations
executive summary
our founder
contact us

RUSH NETWORK
NATIONWIDE WIRELESS BANDWITH

smart 220 customer login

Rush Network is a nationwide provider of intelligent wireless solutions for business. We offer nationwide wireless bandwidth at extremely affordable rates. Our clients are dramatically increasing their company's performance by leveraging our wireless network with the power of the Internet.

data acquisition

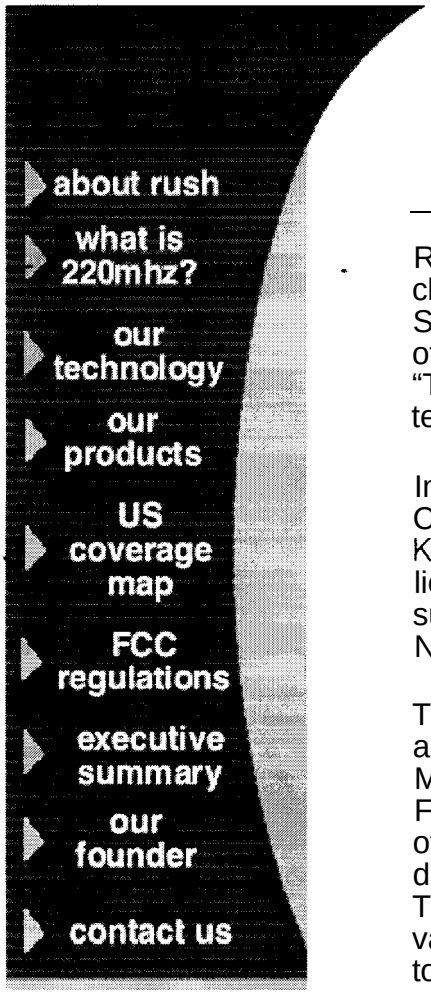
Rush is delivering nationwide wireless data solutions to companies with unique communications requirements. Our wireless bandwidth comes from our exclusive, nationwide 220 MHz radio license.

Broadcast towers across America serve as two-way wireless Metropolitan Area Networks (MANs) that collect information from multiple locations. The data is then transmitted over a secure IP backbone to Rush's data center where it is managed and stored.

wireless applications

Our Smart 220™ Capture System collects data from numerous types of devices in real time, and presents the data to customers in simple or custom formats. Smart 220™ is based on Extensible Markup Language, or XML, which is an open architecture and is device independent.

These two critical attributes allow us to deploy our Smart 220™ Capture System on almost any kind of device in a rapid, cost effective manner. Wireless data applications such as telemetry, SCADA, automatic meter reading, automatic vehicle location and enterprise asset tracking are



RUSH NETWORK
NATIONWIDE WIRELESS BANDWITH

Rush Network Corp. owns a nationwide five channel 220 MHz radio license for the United States. Rush is a privately held company with offices in Addison, Texas, next door to the "Telecom Corridor" of the U.S. telecommunications industry.

In early 1993, the Federal Communications Commission conducted a lottery and awarded Kingdon R. Hughes this nationwide wireless license on July 29, 1993. Mr. Hughes subsequently transferred the license to Rush Network Corp. and remains its principal.

The 220 MHz radio service was originally created as a land mobile radio service. However, on March 12, 1997, and again on May 21, 1998, the FCC amended the rules governing the operation of the 220-222 MHz band to promote the development of advanced radio technologies. These rulemakings dramatically increased the value of Rush's license by allowing the spectrum to be used for virtually any kind of mobile or fixed communications service.

Rush Network Corp. is at the forefront of the 220 MHz industry. It is aggressively pursuing several unique nationwide applications which will take advantage of its license's increased flexibility. While Rush has constructed mobile voice and data communications systems in 49 cities across the country, the company continues to seek new and innovative ideas concerning the use of its license.

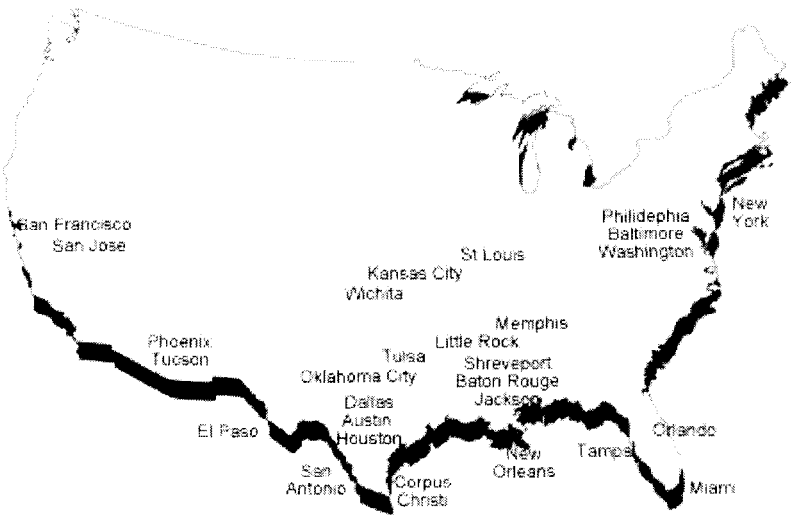
Rush is also a founding stakeholder in STARTech, a Richardson, TX based for-profit business development enterprise that assists high-technology entrepreneurs and early-stage startup companies. Entrepreneurial companies admitted into STARTech have access to seed funding, mentoring, coaching, business plan and market strategy assistance. Connections with prominent venture capital firms, as well as contacts with leading technology corporations, service companies and area universities, are also provided.

about rush
what is 220mhz?
our technology
our products
US coverage map
FCC regulations
executive summary
our founder
contact us

RUSH NETWORK
NATIONWIDE WIRELESS BANDWIDTH

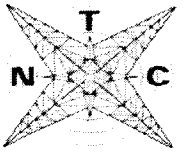
United States Coverage

Rush Network Corp. provides 220 MHz service in 49 cities across the United States, and will offer service in 70 markets by 2003.



Click here to see a coverage map of Dallas,

About Rush | What is 220 MHz? | Our Technology | Our Products
U.S. Coverage Map | FCC Regulations | Executive Summary
Contact Rush



Phone 253-857-0220

Fax 253-857-5954

NTC is the largest provider of 220 MHz spectrum efficient radio service in the Pacific Northwest.

NTC will provide Washington, Oregon and Idaho with reliable, cost effective trunked radio system. This system is designed to provide Northwest Utilities with a common trunked radio dispatch system. The system is designed to function in the worst of conditions. It also exceeds all FCC narrow banding requirements through the year 2005.

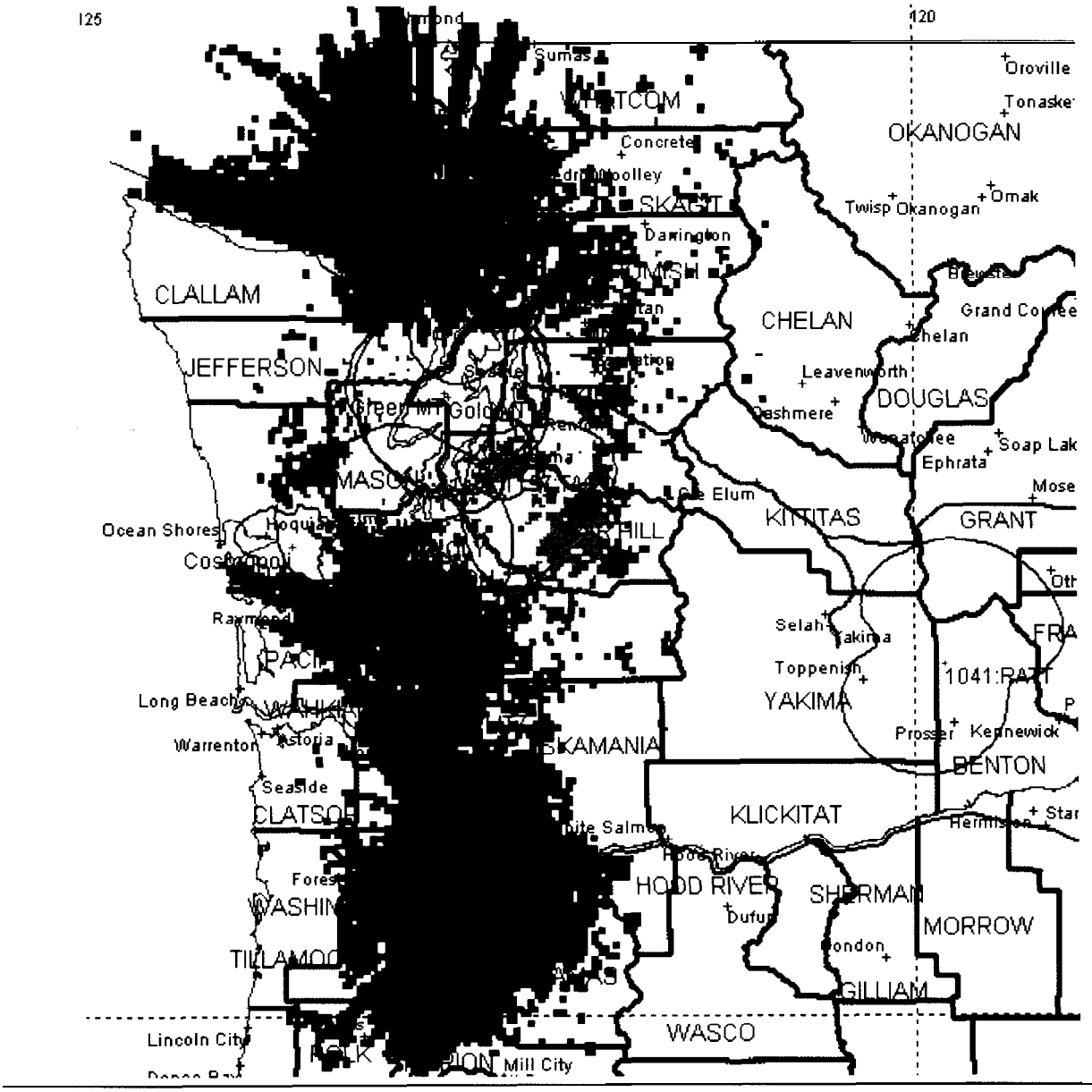
This system is now available to all other businesses and Government agencies. If you have a need for reliable radio dispatch services at costs below cell phone rates, contact the Northwest Telecommunication Corporation. We will be happy to have one of our local dealers provide you with any information you may need.

Northwest Telecommunications Corporation

Phone 253-857-0220

Fax 253-857-5954

Service Area



| Home | What's New at NTC | Service Area | Products | Dealers Wanted | How To Contact Us | FAQ Why 220 MHz |
| Calendar | Members Only | links |

Phone 253-857-0220
Fax 253-857-5954

NTC 220 MHz Program

Frequently Asked Questions

General

Q. Why 220 MHz?

Q. Why Purchase NTCs 220 MHz Radios?

Technical

Q. How is the 220 MHz frequency modulated?

Q. Is the 220 MHz license immune to noise, crosstalk, and other forms of interference?

Q. Can the frequency be jammed?

Q. What is the contour of the radio wave?

Q. How high does the antenna have to be?

Q. Can I transmit data as well as voice on the 220 MHz Band?

Q. Will atmospheric conditions affect the performance of 220 MHz signals?

Q. What is the 220 MHz spectrum?

Q. What is FCC frequency "refarming"?

Q. What is a spectrum efficient two-way radio?

Q How is spectrum efficiency achieved?

Q. How well will my two-way radio system operate using only 5 kHz of bandwidth?

Equipment

Q. When will the 220 MHz equipment be available for purchase?

Q. Can I send data over these narrow-band radios and at what data rates?

Q. Can I use mobile data terminals (MDTs) on this system or do I need another radio in my vehicle for my planned MDT system?

Q. My current radio system has "dead spots." Will 220 MHz eliminate these areas where my units cannot communicate?

Q. Will I experience interference on my 220 MHz system from neighboring co-ops also using 220 MHz?

Q. Can our 220 MHz radios communicate when passing through someone else's service areas?

Federal Communications Commission (FCC)

Q. Where did this 220 MHz spectrum come from?

Q. Does NRTC have a license for these channels?

Q. Is the FCC's approval of NRTC's license imminent?

Q. Why did NRTC decide to purchase these channels?

Q. I recently applied to the FCC for a radio license and the coordination and application took over a year. Will I have to wait this long for approval to use the NRTC 220 MHz radio system?

Refarming

Q. What is refarming?

Q. What has the FCC accomplished?

Q. Which frequency bands are affected by the refarming proceeding?

Q. What are the new channel plans?

Q. Are the new channels available for licensing?

Q. Do I have to buy and use new narrowband equipment? Do I have to move my operations to the 800 MHz band?

Q. Is narrowband equipment currently available?

Q. What are the new type-acceptance standards for private land mobile radio?

General

Q. Why 220 MHz?

A. A 220 MHz radio system efficiently transmits voice and data signals, making it an ideal technology for utility voice, data, and distribution automation applications.

Businesses can upgrade to 220 MHz at an affordable cost.

Existing radio towers can be used in most cases, thus avoiding new tower construction.

Q. Why Purchase NTC's 220 MHz Radios?

A. NTC provides a common national radio platform. This is a great advantage in daily business, emergency situations, and disaster recovery and restoration.

NTC will make it easy for you to convert your radio system now, before signal interference and obsolete equipment force you to make changes to your system.

NTC will offer a turnkey 220 MHz solution.

Economies of scale available to NTC will mean lower radio equipment costs.

NTC's system will use digital trunked technology allowing clear communications with multiple users.

The new flexible FCC usage rules will allow NTC to market 220 MHz radio services to any businesses or government agencies.

Technical

Q. How is the 220 MHz frequency modulated?

A. The NTC license does not mandate a specific modulation, only the permissible emissions within the 5 kHz bandwidth. The equipment used by the current licensee employs Amplitude-Companded Single Sideband modulation. This is not preferred for data transmissions. The leading technology for mobile data communications is Linear Modulation (LM), which is a double sideband modulation using digital signal processing (DSP).

Q. Is the 220 MHz license immune to noise, crosstalk and other forms of interference?

A. The impact of noise, crosstalk, and interference are reduced because of error correction embedded in the modulation process. Crosstalk is not possible for 220 MHz systems employing LM because of channel exclusivity and DSP. System design and prescribed installation practices are always necessary to mitigate noise and interference in two-way radio systems.

Q. Can the frequency be jammed?

A. There is no existing radio system or frequency which cannot be jammed. The 220 MHz frequencies are no less susceptible to jamming than other frequencies. Moreover, LM is less susceptible to interference (or jamming) than most other modulation techniques, including FM and digital modulation, which is used for 800 and 900 MHz systems, cellular, and PCS.

Q. What is the contour of the radio wave?

A. The reliable coverage area, or contour, of radio systems varies inversely with frequency. That is, 220 MHz systems will normally cover a much greater area than 450 MHz or 800 MHz systems. The exact contour depends on antenna height and gain, and terrain.

Q. How high does the antenna have to be?

A. The required antenna height depends on system design and coverage requirements. An antenna at 100 feet would normally cover between 14-18 miles; a 200-foot antenna would cover between 25-30 miles, etc. Antenna heights above 300 feet are rarely required.

Q. Can I transmit data as well as voice on the 220 MHz band

A. Data and paging are external applications. The radio path is essentially a transparent medium, much the same as a telephone circuit. The limitation for data transmission is based on the technology used. Currently, LM supports data speeds as high as 16.8 kilobits per second, although slower speeds (such as 9600 or 14.4 kbps) would be more reliable.

Q. Will atmospheric conditions affect the performance of 220 MHz signals?

A. Atmospheric conditions affect 220 MHz frequencies much less than low band [because of skip] or frequencies above 800 MHz [because of K-factor changes]. The 220 MHz frequencies are not immune to atmospheric anomalies, but atmospheric conditions are not a major factor for 220 MHz propagation.

Q. What is the 220 MHz spectrum?

A. This spectrum consists of pairs of frequencies or channels operating at 5 kHz bandwidths in the 220 and 221 MHz ranges. The FCC reallocated these channels in the new narrow-band format to provide additional spectrum for wireless applications.

Q. What is FCC-frequency refarming?

A. The FCC refarming initiative is designed to provide more capacity in the limited spectrum available. Refarming will be implemented in a two-step process and applies to the radio frequencies between 150 MHz and 512 MHz. Low-band frequencies (30-50 MHz) are also subject to refarming. Today all new radios must be 12.5 kHz bandwidth compatible to receive FCC type-acceptance. By the year 2005, the FCC plans to further narrow the bandwidth requirement to 6.25 kHz. Manufacturers requesting type-acceptance at that time must be compliant with 6.25 kHz bandwidth operation. The FCC has not set a termination date for operating in the wider bandwidths, therefore, the possibility of interference between operators could increase.

Q. What is a spectrum efficient two-way radio?

A. Most older two-way radio systems use either 25 or 30 kHz of bandwidth per channel. The new 220 MHz radios operate on the new narrow-band format using only 5 kHz of bandwidth per channel. This spectrum-efficient system typically allows five or six simultaneous users in the same channel space.

Q. How is spectrum efficiency achieved?

A. Spectrum efficiency is generally achieved by using Linear Modulation (LM) techniques rather than Frequency Modulation (FM) now used by most radio systems. Spectrum efficiency and good voice quality are achieved by using new integrated circuit technology.

Q. How well will my two-way radio system operate using only 5 kHz of bandwidth?

A. You should notice little difference between your 25-30 kHz bandwidth radios and the new 220 MHz spectrum-efficient system. In fact, the audio quality should be equal to or better than the older systems. Industry experts also claim that 220 MHz has a broad reach and has the ability to fill in dead spots under other frequencies.

Equipment

Q. When will the 220 MHz equipment be available for purchase?

A. 220 MHz equipment is currently available from NTC. NTC has worked with the manufacturer to make 220 MHz equipment available at affordable prices. We are also looking at allowing local radio dealers to sell and service our radios.

Q. Can I send data over these narrow-band radios and at what data rates?

A. Yes. 220 MHz bandwidth radio systems support data transmission. Linear Modulation (LM) applied to narrow-band 220 MHz radios allow data rates of up to 14.4 kilobits per second (kbps).

Q. Can I use mobile data terminals (MDTs) on this system or do I need another radio in my vehicle for my planned MDT system?

A. 220 MHz radios provide both push-to-talk and MDT communication paths. Radios purchased will come with data ports for computer connectivity.

Q. My current radio system has "dead spots." Will 220 MHz eliminate these areas where my units cannot communicate?

A. Any radio system must be properly engineered to provide adequate coverage of your service area. The 220 MHz system should perform as well as Low and High VHF high-band system (38-49 MHz and 150-174 MHz). The 220 MHz frequency does not suffer the line-of-sight characteristics of the UHF (450-470 MHz) bands or the 800 MHz and 900 MHz bands.

Q. Will I experience interference on my 220 MHz system from neighboring co-ops also using 220 MHz?

A. Interference is often the result of poor system engineering, such as placing towers too close together. Proper engineering and system design can greatly reduce interference. Certain atmospheric conditions can cause a radio signal to travel farther than intended. These conditions are impossible to completely eliminate. All radio systems are potentially subject to interference. The interoperability of the 220 MHz system will be especially useful in cases of natural disasters or service outages when the need to coordinate crews from multiple utilities is critical to service restoration.

Q. Can our 220 MHz radios communicate when passing through someone &e's service areas?

A. Yes. The NTC 220 MHz system will use a computer and special software to assign operating frequencies to each radio. The base stations can be instructed to allow certain mobile units to operate within a particular service area. It is also possible to establish a nationwide roaming code, allowing any cooperative's vehicle to communicate with any other cooperative's radio system. These systems can be programmed over the air, allowing designated units to be "turned on" in a particular service area.

Federal Communications Commission (FCC)

Q. *Where did this 220 MHz spectrum come from?*

A. The 220 MHz band was set aside by the FCC in 1991 for fixed and mobile voice and data transport. Four national licenses were issued in a 1992 FCC lottery. Additional channels were auctioned by the FCC in the summer of 1998.

Q. Does NRTC have a license for these channels?

A. NRTC purchased an existing five-channel 220 MHz national license. At the FCC auction they purchased two national licenses and a block of regional licenses. These provide 40 national channels. NTC purchased additional Economic Area licenses providing an additional 10 to 40 channels for Washington, Oregon, and Northern Idaho.

Q. Is the FCC's approval of NRTC's license imminent?

A. According to NRTC's outside counsel, we have met all of the expected FCC requirements for this license.

Q. Why did NRTC decide to purchase these channels?

A. After surveying its members on their two-way radio communications needs and concerns, NRTC decided to make available to its members an affordable and reliable radio system for the rural utility industry. We recognized the need to create a common radio platform using common equipment to provide true nationwide service

Q. I recently applied to the FCC for a radio license and the coordination and application took over a year. Will I have to wait this long for approval to use the NRTC 220 MHz radio system?

A. NRTC will own the license and will be responsible for ensuring compliance with FCC.requirements. The FCC must issue a license for each frequency at each site, which will require some administrative work by NRTC. NRTC is supporting a petition pending at the FCC to simplify and expedite the current regulatory process.

Refarming

Q. What is re farming?

A. Refarming has been an effort to develop an overall strategy for using the spectrum in the Private Land Mobile Radio (PLMR) allocations more efficiently to meet future communications requirements.

Q. What has the FCC accomplished?

A. The following is a brief summary of the accomplishments of the refarming proceeding.

In June 1995, the Commission adopted a *Report and Order* (R&O) which created a new narrow-band channel plan in the Private Land Mobile Radio (PLMR) bands below 800 MHz. This plan adopted a transition schedule based on the type-acceptance process, and determined that the twenty PLMR services should be consolidated. (The details of consolidation were left for a future document).

In December 1996, the Commission adopted a *Memorandum Opinion and Order*

(*MO&O*) which responded to 24 petitions for reconsideration of the R&O. The *MO&O* clarified many of the decisions of the R&O and made appropriate modifications to the rules.

In February 1997, the Commission adopted a *Second Report and Order* (*Second R&O)* which consolidated the 20 PLMR services into two pools - Public Safety and Industrial/Business. Additionally, the *Second R&O* adopted rules to allow some centralized trunking in the shared PLMR bands below 800 MHz. The rules adopted in the *Second R&O* are effective October 17, 1997.

Q. Which frequency bands are affected by the refarming proceeding?
A. The rules adopted in the refarming proceeding are only applicable to the PLMR bands below 800 MHz. Specifically, the technical rules adopted affect the licensing and use of radios in the following bands:

150-174 MHz - VHF high band; available nationwide
421-430 MHz - available only in Detroit, Buffalo, and Cleveland
450-470 MHz - available nationwide
470-512 MHz - shared with UHF-TV; available only in 11 cities
In addition to the radio bands listed, the consolidated frequency pools adopted in the Second R&O also include all PLMR frequencies available below 150 MHz

Q. What are the new channel plans?

A.Prior to refarming, channels were 25 kHz wide and, in general, spaced every 25 kHz (primary channels). Additionally, low power (maximum output power of 2 watts) channels spaced 12.5 kHz offset from the primary channels were available on a secondary non-interference basis (12.5 kHz offset channels). The *R&O* modified this channel plan by adding three new channels every 6.25 kHz above each existing primary channel.

Operation on the new channels 6.25 kHz removed from a primary channel is restricted to equipment designed to operate on channel bandwidths of 6.25 kHz or less. Operation on the new channels 12.5 kHz removed from a primary channels is restricted to equipment designed to operate on channel bandwidths of 12.5 kHz or less.

Q. Are the new channels available for licensing?

A.

Q. Do I have to buy and use new narrowband equipment? Do I have to move my operations to the 800 MHz band?

A.

Q. Is narrowband equipment currently available?

A.

Q. What are the new type-acceptance standards for private land mobile radio?

A. The rules adopted in this proceeding provide 10 years for manufacturers to phase in new narrow-band equipment. In order to type-accept new equipment, manufacturers must comply with the following requirements:

February 14, 1997

Applications for type-acceptance will only be granted if the equipment provides at least one voice channel per 12.5 kHz of channel bandwidth and/or is capable of supporting a minimum data rate of 4800 bits per second per 6.25 kHz of channel bandwidth. Dual-mode 25112.5 kHz equipment is acceptable.

* The data rate standard applies only to equipment that is designed to operate on channels greater than 6.25 kHz with output power greater than 500 mw.)

January 1, 2005

Applications for type-acceptance will only be granted if the equipment provides at least one voice channel per 6.25 kHz of channel bandwidth and/or is capable of supporting a minimum data rate of 4800 bits per second per 6.25 kHz of channel bandwidth. Dual-mode 12.5/6.25 or 2516.25 kHz or multimode 25/12.5/6.25 kHz equipment is acceptable.

* The data rate standard applies only to equipment that is designed to operate on channels greater than 6.25 kHz with output power greater than 500 mw.)

** The January 1, 2005 standards do not apply to hand-held transmitters with an output power of two watts or less.

Q. What is trunking and can I implement a trunked radio system?

A. In a conventional radio system, a radio can access only one channel at a time. If that channel is in use, the user must either wait for the channel to become idle or manually search for a free channel. A trunked radio system differs from a

conventional system by having the ability to automatically search all available channels for one that is clear.

The FCC has recognized two types of trunking: centralized and decentralized. A centralized trunked system uses one or more control channels to transmit channel assignment information to the mobile radios. In a decentralized trunked system, the mobile radios scan the available channels and find one that is clear.

The rules require that licensees take reasonable precautions to avoid causing harmful interference, including monitoring the transmitting frequency for communications in progress. This requirement is met in decentralized trunked systems because each mobile unit monitors each channel and finds a clear one to transmit on. In a centralized trunked radio system, radios typically monitor the control channel(s), not the specific transmit frequencies. Therefore, this form of trunking has not, generally, been allowed in the shared bands below 800 MHz.

| Home | What's New at NTC | Service Area | Products | Dealers Wanted | How To Contact Us | FAQ Why 220 MHz |
| Calendar | Members Only | links |

Before the
FEDERAL COMMUNICATIONSCOMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Promoting Efficient Use of Spectrum Through	)	WT Docket No. 00-230
Elimination of Barriers to the Development of	)	
Secondary Markets	)	
	)	
	)	

LOW

To: The Commission

COMMENTS OF SECURICOR WIRELESS HOLDINGS, INC.

Securicor Wireless Holdings, Inc. ("Securicor Wireless"), by its counsel, hereby submits its Comments on *the Notice of Proposed Rulemaking* ("NPRM") in the above-captioned proceeding.[1]

I. BACKGROUND

A. Securicor Wireless

Securicor Wireless is the largest service provider in the 220-222 MHz band ("220 MHz Service"). Through its two subsidiaries, Intek License Acquisition Corp. ("ILAC") and Roamer One, Inc. ("Roamer One"), it is by far the largest single license holder in the 220 MHz Service and, with its national footprint, it serves customers in markets throughout the United States. Securicor Wireless has acquired 220 MHz spectrum by assignment, lottery and auction, and has also been active in partitioning and disaggregating its licensed holdings, when it determined that the spectrum could be more efficiently developed by a partner. Moreover, Securicor Wireless

---

[1] Promoting Efficient use of Spectrum Through Elimination of Barriers to the Development of Secondary Markets, WT Docket *No. 00-230, Notice of Proposed Rulemaking,* FCC 00-402 (rel. Nov. 27, 2000) ("NPRM").

continues to seek out new opportunities to expand its 220 MHz spectrum holdings and plans to make the 220 MHz Service as competitive as other commercial and private wireless services.

As the Commission is aware from Securicor Wireless's participation in the recent public forum on secondary-markets in radio spectrum,[2] and other proceedings before the Commission,[3] Securicor Wireless has been actively exploring a new use for the 220 MHz spectrum – spectrum leasing. Therefore, Securicor Wireless is very interested in this proceeding and commends the Commission for its leadership in promoting more efficient use of spectrum by eliminating barriers to secondary markets.

B. 220 MHz SMR Market

The Commission initially set aside the two megahertz of spectrum in the 220-222 MHz band for the development of narrowband technology. Originally, the Commission authorized use in the 220 MHz Service by site-specific licenses; even the nationwide licenses were licensed on a site-specific basis. Like most wireless services, the Commission would later amend its rules for 220 MHz Service to allow for geographic licensing, acquired through competitive bidding, and to permit licensees to partition their licensed service area and disaggregate their licensed frequencies.

Securicor Wireless believes that while the 220 MHz market has been successful, it has not reached its full potential, primarily because licensees do not have the opportunity to maximize the use of their spectrum for the development of the market. By allowing greater

---

2 See Statement of Robert J. Shiver, President and Chief Executive Officer of Securicor Wireless Holdings, Inc. before the Federal Communications Commission Public Forum on Secondary Markets in Radio Spectrum held on May 31, 2000 (http://www.fcc.gov/realaudio/presentations/2000/053100/welcome.html).

regulatory flexibility, the Commission will give 220 MHz licensees the opportunity to fully utilize their best asset – their spectrum – towards the better development of the service. Specifically, spectrum leasing will allow licensees, like Securicor Wireless, to lease out portions of their spectrum holdings that would otherwise go underused or unused, especially in secondary or tertiary markets, without losing their core asset. Securicor Wireless believes that such spectrum leasing is in both the public interest and the interest of the 220 MHz licensees, because it will encourage greater use of the 220 MHz spectrum and help generate revenue that will encourage a more complete nationwide 220 MHz network and provide a clear alternative to other wireless services for small and medium-size businesses.

II. SECONDARY MARKETS N RADIO SPECTRUM – SPECTRUM LEASING

A. Existing Spectrum Secondary Markets

As set forth in the NPRM, the concept of secondary markets in radio spectrum generally refers to markets in which an entity may acquire licenses (in whole or in part), or rights to use all or portions of the licensed spectrum from entities that have been authorized to use that spectrum by the Commission. A secondary market in radio spectrum has existed for years, primarily through assignment of licenses or transfer of control of licensees. Moreover, licensees have also entered into a variety of arrangements to allow other entities use of their frequencies without relinquishing control, including management agreements, joint marketing agreements, and resale agreements. In addition, in recent years, the Commission has continued to expanded the option of partial assignments, either by partitioning part of a licensed service area, disaggregating

---

3 See, e.g., Comments filed by Securicor Wireless Holdings, Inc. dated September 15, 2000, in response to 'Wireless Telecommunications Bureau Seeks Comment on Request for Clarification of De *Facto* Control Policy and Proposed Spectrum Lease Agreement," *Public Notice,* DA 00-l 953 (rel. Aug. 24.2000).

portions of the licensed frequencies, or some combination thereof. None of these approaches, however, provide licensees with the flexibility allowed in spectrum leasing.

B. Spectrum Leasing.

As set forth in the NPRM, "spectrum leasing" refers to the leasing by Commission licensees of their spectrum usage rights to third parties.[4] Spectrum leasing allows licensees to lease, for a certain duration, a portion or all of their licensed spectrum to entities that need spectrum but neither have the resources or desire to acquire and maintain spectrum directly from the Commission or from licensees on an permanent basis. Moreover, spectrum leasing makes sense to licensees because it places spectrum that might otherwise go unused or underutilized into use, producing more revenue for licensees, while allowing licensees to maintain their core asset – their licensed spectrum.

As the Commission recognized in the NPRM, some services already are able to lease part of their unused or underutilized spectrum. For example, ITFS and MDS licensees have developed a symbiotic relationship where ITFS licensees lease part of their spectrum holdings to MDS operators in exchange for help in constructing and maintaining facilities. Likewise, leasing has been allowed in various manners in the satellite context. In addition, the Commission has recently established a new wireless service, the 700 MHz Guard Band spectrum, that was created entirely with the idea that the spectrum would be leased by a private, separately licensed "band managers."[5]

---

[4] NPRM at n. 3.

[5] The band manager concept is also currently being considered in other new wireless services, including the 3650-3700 MHz and 4.9 GHz bands. See generally Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services, *Fifth Report*, 15 FCC Rcd 17660 (2000); 4.9 GHz Band Transferred from Federal

Despite these advances in certain services, the vast majority of licensees are either prohibited from leasing their licensed spectrum or are uncertain whether they can lease spectrum. Such uncertainty has been intensified recently by the apparent discrepancies between the Commission's traditional standard for control of facilities and the Commission's most recent statements regarding control, either in the 700 MHz Guard Band proceeding or by statements made by Commission officials at the Secondary Markets Public Forum.[6] In any event, such uncertainty has placed a chill on the development of secondary markets, to the point that many licensees are currently skeptical about entering into any secondary transactions. Therefore, Securicor Wireless strongly requests that the Commission act expeditiously in the instant proceeding so spectrum secondary markets can continue and expand into greater of spectrum leasing.

C. **Benefits of** Spectrum **Leasing**

As limited spectrum becomes more scarce, it is more important now to fully utilize all available spectrum. To have spectrum sit fallow because of limits on the control standard makes little economic sense and is not in the public interest as the most efficient use of the radio spectrum. Moreover, as new technology is created to utilize as much of the spectrum as possible – for example, software-defined radios –

Spectrum leasing is also in the public interest because it provides greater opportunities for small businesses.

Government Use, **WT** Docket *No. 00-32, First Report and Order and Second Notice o/Proposed Rule Making,* FCC 00-363 **(rel.** Oct. **24, 2000).**

maintain the spectrum, and dispose of it when they no longer need it. Spectrum leasing would give these companies access to spectrum on terms more suitable to their business plans.

Spectrum leasing is also important for utilization of spectrum in secondary and tertiary markets. As many nationwide licensees do, Securicor Wireless has focused its initial rollout of service to primarily high-population urban areas. Securicor Wireless has partnered with other entities to bring 220 MHz Service to rural areas, either through partitioning and disaggregation or other types of arrangements. These relationships, however, have been limited because of they are cumbersome, costly and hard to administer, and a licensee must surrender part of its core asset. Spectrum leasing would allow licensees to maximize their use of the spectrum without losing their core, revenue-producing asset, while at the same time encouraging service to underserved or unserved areas.

D. No Detriment to Allowing Greater Use of Spectrum Leasing

The NPRM asks if there are any parties, such as licensees, spectrum users, or the public in general, that may not benefit from a wider use of spectrum leasing. Securicor Wireless is not aware of any such parties. As outlined above, there are indeed a great deal of benefits for allowing greater use of spectrum leasing. Moreover, in the event that some detriment from spectrum leasing may possibly exist, it would likely be alleviated if spectrum leasing is presented as an option available to all eligible wireless licensees.

The Commission also asks if there are any practical limits to spectrum leasing, such as potential lessees being unwilling to build out facilities if they are only leasing for a short period. Securicor Wireless believes that spectrum leasing should be an option that licensees and

---

[6] Federal Communications Commission Public Forum on Secondary Markets in Radio Spectrum held on May 31, 2000.

potential lessees can evaluate and determine if it is in their best economic interest to choose that option. Even temporary use of spectrum that would otherwise go unused or underutilized is a benefit to licensees and the businesses and consumers – and the public in general – that use the spectrum. Potential spectrum lessees will decide whether it is in their interest to build out facilities given the length of the lease and need for the spectrum. Moreover, short-term lessees may decide to eventually acquire the leased spectrum from the licensee *(i.e.*, a lease with option to buy) or sell the constructed facilities to the licensee, which in turn can lease the spectrum to another lessee or use it for its own purposes. With several available options, the Commission should allow licensees and lessees the flexibility to enter into whatever relationships allow for the most efficient and economic use of the spectrum, within the parameters of control set forth in this proceeding.

Along the same lines, the Commission should not regulate the amount of spectrum that a potential lessor must lease. In the recent 700 MHz Guard Band proceeding, the Commission required Guard Band licensees to lease a predominant amount *(i.e.*, at least 5 1%) of their spectrum.[7] Such a restriction, while perhaps relevant to the specific circumstances of the Guard Band spectrum, would not allow the most efficient use of the spectrum via spectrum leasing. For example, a licensee's business plan may envision that ten percent of its licensed spectrum will go unused for the first five years after acquiring the license, but that the licensee will need all of the spectrum thereafter. Spectrum leasing would allow that licensee to lease a portion of its frequencies to a third party that needs spectrum for a short-period (for example, while they are transitioning to a new service or technology). After the five-year period, the licensee could then

---

[7] See In the Matter of Service Rules for the 746-764 and 776-794 MHz Bands, and Revisions to Part 27 of the Commission's Rules, *WT* Docket No. 99-168, Second *Report and Order, 15* FCC Rcd. 5299 (2000). See *also* 47 C.F.R § 27.603(c).

recapture use of the spectrum without having to go through costly transactional and regulatory hurdles. Requiring potential lessors to lease a certain minimum level of spectrum may hamper such transactions. Moreover, the cost and time for the Commission to regulate and enforce such restrictions has little or no corresponding public benefit.

III. SCOPE OF SPECTRUM LEASING PROPOSAL IN NPRM

The Commission tentatively concludes to limit the specific proposals set forth in the NPRM, at least initially, to Wireless Radio Services in which licensees have exclusive rights to use the licensed spectrum. As set forth in the Commission's rules, "Wireless Radio Services" includes Part 90 licenses, whether commercial or private in nature,[8] and, although not specifically enumerated in the NPRM, includes licenses in the 220 MHz Service.' The licenses in the 220 MHz Service that have exclusive rights to the licensed spectrum can be regulated as either Commercial Mobile Radio Service ("CMRS") and Private Mobile Radio Service ("PMRS") licenses.

Securicor Wireless agrees with the Commission's tentative conclusion to limit the initial scope of spectrum leasing to "exclusive-use" Wireless Radio Services. While the Commission may later determine that expansion of secondary markets is appropriate or desirable for other services, including "shared use" spectrum, it is more advisable to initially begin with exclusive wireless licenses and study how the secondary markets actually develop. If the Commission attempts to answer all of the various issues that are brought up with these other services (including how shared use would work in the leasing context), it would substantially delay

[8] See 47 C.F.R § 1.907 ("Wireless Radio Services" is defined as all radio services authorized in parts 13, 20, 22, 24, 26, 27, 74, 80, 87, 90, 95, 97 and 101 of Chapter I of Title 27 of the U.S. Code).

introduction of spectrum leasing. If, at a later date and after further consideration, the Commission later decides it appropriate to expand spectrum leasing to other services, then it could do so at that time.

Securicor Wireless also advocates that the spectrum leasing proposals set forth in the NPRM should apply equally to both CMRS and PMRS licenses. So long as the licensees have exclusive use over the licensed frequencies, the spectrum leasing proposals considered in the NPRM apply the same to both regulatory categories.

IV. COMMISSION'S SPECTRUM LEASING PROPOSAL

Securicor Wireless suggests the Commission set forth a general framework for spectrum leasing that, if followed, would essentially be a "safe harbor" for licensees and potential lessees. Under such a framework, if a particular spectrum leasing arrangement follows the general criteria outlined by the Commission, then the licensee and potential lessee should be allowed to develop an arrangement particular to their own business needs. Such an arrangement would, therefore, primarily be between the licensee and lessee and interaction with the Commission would be minimal. Securicor Wireless believes that such a framework for spectrum leasing would be the most effective way to create a robust secondary market.

A. Responsibility for Compliance with Commission's Rules.

Under the Commission's proposal set forth in the NPRM, the licensee must retain ultimate responsibility for ensuring that a spectrum lessee complies with the requirements of the Communications Act and the applicable technical and service rules. Securicor Wireless

---

[9] See NPRM at n. 19 (includes Private Land Mobile Radio Services, but does not specifically enumerate the 220 MHz Service).

understands the Commission's proposal that the licensee has ultimate responsibility for the use of its licensed spectrum, but also supports the notion that the Commission should also have the option, where appropriate, to enforce particular sanctions against the lessee directly for non-compliance. Securicor Wireless believes that there may be circumstances were it is more appropriate or expedient for the Commission to act directly with the spectrum user, while maintaining ultimate responsibility with the licensee.

The relationship between the Commission, the licensee and the lessee should be set forth in the spectrum lease. The spectrum lease should specify certain conditions to which the lessee must agree. For example, as the NPRM suggests, the lessee must (1) comply with all applicable FCC rules, including those that may be imposed at a later tune; (2) accept FCC oversight and enforcement consistent with licensee's license; and (3) cooperate fully with an investigation or inquiry conducted by either the FCC or the licensee. If these conditions are in the spectrum lease, the lease should be deemed to meet the relevant standard of control (as set determined in the instant proceeding). Such conditions will provide the licensee and lessee with a "safe harbor," and if the parties do not believe one or more of these conditions apply to their particular situation, then they may need to request prior approval from the Commission.

The Commission also asks in the NPRM if it should impose additional requirements on the licensees to ensure that each of its spectrum lessees complies with all the applicable interference, technical and service rules. For example, the Commission suggests that it could require the licensees to perform due diligence on the lessee and its activities to ensure compliance. Alternatively, the lessee could be required to certify that it complies with Commission rules and policies. Securicor Wireless believes such additional requirements are both unnecessary and could be difficult to implement or burdensome on the Commission's

resources. Securicor Wireless believes that licensees will have the proper incentive to engage in an initial due diligence examination of a potential lessee and continued monitoring of the lessee's activities to ensure it would maintain its core asset *(i.e.,* its licensed spectrum). Requiring a due diligence process would be diffkult to enforce and may take an unusual amount of time and resources away from normal Commission activities. Certainly, a certification process would be easier to implement and more flexible from the licensee's perspective, however, it too has little practical advantage.

The Commission also suggests that it may be appropriate to require licensees and lessees to maintain written agreements and keep them current and available upon request for inspection by the Commission or its representatives, as was required in the 700 MHz Guard Band. Securicor Wireless agrees with the general notion that licensees and lessees should maintain written agreements and keep them current, however, it believes that this practice would be self-imposed. Such practice is common in the prudent course of business, and therefore, it is unnecessary as a regulation. Spectrum leasing agreements should be not different than any other agreements made between Commission licensees and third-parties related to the licensed spectrum, all of which are available to the Commission staff upon request. Securicor Wireless does note, however, that spectrum leases should be considered proprietary and advocates that the Commission should liberally grant confidentiality treatment to such agreements.

Securicor Wireless agrees with the Commission's proposal to have disputes resolved in the same manner that parties would resolve commercial disputes under contract, that is through either court or alternative dispute resolution ("ADR"). As with the proposed requirement for written and current agreements, however, Securicor Wireless believes such action should be left to the parties to negotiate. Recognizing that such provisions may help to avoid litigation that

could tie up spectrum, the Commission could *encourage* licensees to place ADR provisions (arbitration or mediation) in their leasing agreements.

B. Interference, Frequency &ordination and Other Technical Rules

The Commission asks in the NPRM what kind of relationship a licensee and potential lessees should have in complying with the Commission's rules against interference and other technical rules. Securicor Wireless believes that, in general, the Commission should allow the parties to negotiate who is initially responsible for any conflicts or problems with other licensees and/or lessees. The licensee, however, will always maintain a oversight role and will be ultimately responsible to resolve any conflicts. This general framework will provide licensees the greatest amount of flexibility to determine what works in their particular situations, while allowing parties affected by the licensed spectrum to work directly with those entities that are using the spectrum.

C. Service Rules

Securicor Wireless believes that the success of a robust secondary markets is contingent on a maximum amount of flexibility allowed to licensees and lessees. Based on this premise, the Commission should start any analysis regarding the applicability of specific service rules to lessees with the idea that, unless otherwise necessary, the rules should not strictly be applied to lessees. Securicor Wireless notes, however, that there may be a number of circumstances that, by not applying the service rules to the lessees, entities can use spectrum leasing to circumvent the Commission's rules. Therefore, Securicor Wireless advocates an approach with maximum

flexibility for licensees to lease their spectrum, but application of certain service rules to lessees to prevent circumvention of the Commission's rules.

D. Construction/Substantial Service Requirements

In the NPRM, the Commission proposes to permit a licensee to rely on the activities of its lessee(s) when establishing that the licensee has met the applicable construction, substantial service, or similar coverage requirements. Securicor Wireless agrees with this proposal because it believes that it will give licensees the flexibility to lease spectrum that is not being used while focusing their efforts on building out other parts of their network. Build out requirements are in place to encourage use of the spectrum by prompting licensees to construct a minimum level of facilities within a given timeframe. On the other hand, licensees have sufficient economic incentive, apart from the Commission's requirements, to build out their systems as market dictates: Therefore, if a licensee decides that it is in its best economic interest to lease part of its spectrum holdings, either temporarily or a long-term basis, then it is still putting its spectrum to more efficient and economic use. Thus, if a licensee is leasing part of its spectrum holdings to an entity that is effectively using the spectrum, there is little concern about non-competitive spectrum warehousing.

Securicor Wireless also agrees with the Commission's tentative conclusion that the licensee's reporting requirements are adequate to demonstrate that the spectrum is being used. Any additional requirements may be unnecessarily burdensome on both the licensee and the lessee and may possibly stifle the development of a robust spectrum secondary market. Moreover, Securicor Wireless reiterates that, while information should be made available to Commission staff to properly determine compliance with the Commission's rules and regulations,

some of the information may be proprietary and, therefore, Securicor Wireless requests that the Commission grant liberal application of confidentiality requests.

V. NEW CONTROL STANDARD FOR SPECTRUM LEASING

As the NPRM sets forth in detail, any arrangements for leasing spectrum (or introduction of frequencies into the secondary market in general), must continue to comply with all statutory requirements, including particularly Section 3 1 O(d) of the Communications Act.[10] Section 3 1 O(d) prohibits the unauthorized transfer of control or assignment of licenses (or parts of licenses, where permitted) to third parties. For many of wireless licenses, the Commission historically has interpreted Section 3 1 O(d) *through* its 1963 *Intermountain Microwave* decision, in which it set forth six factors for determining whether a *de facto* transfer of control has occurred." The Commission has also used other tests in interpreting Section 3 10(d) in other contexts, including the private radio and broadcast.[12]

In the NPRM, the Commission recognized that the types of leasing arrangements that it proposes to allow in this proceeding may conflict *with Intermountain Microwave* standards of control. The Commission also recognized that *Infermountain-Microwave* is not controlling, and is simply an interpretation -- one that Securicor Wireless notes is over 35 years old. Therefore, the Commission tentatively proposes a new standard to ensure that licensees retain control for Section 3 10(d) purposes. Specifically, the Commission proposes a three-part test, in which

---

10 47 U.S.C. § 3 10(d).

11 *Intermountain Microwave*, 12 FCC 2d 559, 24 RR 983 (1963).

12 See, e.g., Applications of Motorola, Inc. for 800 MHz Specialized Mobile Radio Trunked Systems, File *Nos. 507505 et al., Order* (Private Radio Bureau 1985) (control of private radio licenses rests on licensee's supervision and its propriety interest in equipment); Application of WGPR, Inc. and CBS, Inc. For Assignment of License at WGPR-TV, *Memorandum Opinion and Order*, 10 FCC Rcd 8 140, 8 141 (1995) (test for broadcast licenses examines who controls the programming, personnel, and fmancing).

would require the licensee to (1) retain full responsibility for compliance with the Communications Act and the FCC's rules and policies with regard to the use of licensed spectrum by any lessee or sublessee; (2) certify that each spectrum lessee (or sublessee) meets all applicable eligibility requirements and complies with all applicable technical and service rules; and (3) retain full authority to take all actions necessary in the event of noncompliance, including the right to suspend or terminate the lessee's operations if such operations do not comply with the Communications Act or the Commission's rules. As discussed below, Securicor Wireless believes that this new standard, with some modifications, will both satisfy the statutory requirements and provide licensees an increased amount of flexibility in forming relationships with spectrum lessees.

With regard to the first prong, Securicor Wireless believes that the Commission should modify its requirement that the licensee retain *full* responsibility for compliance with the Communications Act and Commission rules and policies with regard to the lessee's use of the licensed spectrum. Instead, Securicor Wireless advocates that the licensee should retain *ultimate* responsibility for compliance. As noted above, there may be cases in which the Commission may wish to proceed directly against the lessee as a telecommunications service provider under the Communications Act. Moreover, the spectrum lease may be crafted to allow the Commission to act directly against the lessee for violations of the Commission's rules or policies. Of course, this modification would not relieve the licensee of its ultimate responsibility for the licensed spectrum, but it allows certainty flexibility in circumstances where it is deemed most appropriate or efficient for the Commission to act directly against the lessee for a possible violation.

With regard to the second prong, the requirement may not be necessary, and if it is necessary, that it should be slightly modified. The Commission must first determine whether or not the lessee is in fact required to meet all the eligibility requirements and to comply with all applicable technical and service rules. As the Commission itself acknowledges in the NPRM, there may be circumstances where it is not appropriate to require the lessee to follow the same requirements and rules as the licensee. Moreover, if certification of compliance is deemed necessary, that the licensee should only need to certify that lessee has itself certified that it meets all of the requirements and rules and that its lease requires that the lessee will comply with all applicable technical and service rules.

Finally, with regard to the third and final prong, the standard as set forth by the Commission adequately meets the statutory requirement and provides flexibility to licensees that are interested in leasing their spectrum.

VI. CONCLUSION

For the foregoing reasons, Securicor Wireless urges the Commission to adopt the proposals set forth in the NPRM with the modifications suggested in these Comments. Securicor Wireless, furthermore, respectfully requests that the Commission act in this proceeding in an expedited manner so licensees and potential lessees can begin to enjoy the benefits of spectrum leasing in the immediate future.

Respectfully submitted,

SECURICOR WIRELESS HOLDINGS, INC.

Scott A. Mackoul

Scott A. Mackoul

SQUIRE, SANDERS & DEMPSEY L.L.P.
1201 Pennsylvania Avenue, N. W.
P.O. Box 407
Washington, DC 20044-0407
(202) 626-6600

Counsel for Securicor Wireless Holdings, Inc.

Dated: February 9, 2001

EXHIBIT C

LIST OF 450 MHZ LICENSEES AUTHORIZED TO PROVIDE COMMERCIAL SERVICE IN THE RELEVANT MARKETS

450 MHz Licensees With Authority to Provide Commercial Services

Market	RADIO SERVICE CODE 1/	ENTITY NAME	CLASS STATION CODE 1/
Atlanta, GA	IG	BEARDEN, FRANK	FB4
Atlanta, GA	IG	FLOWER CART INC	FB4
Atlanta, GA	IG	GILBERT SOUTHERN CORP	FB4
Atlanta, GA	IK	H & H CONSTRUCTION COMPANY	FB6C
Atlanta, GA	IG	HILL TIRE CO INC	FB4
Atlanta, GA	IG	HUDGINS, FRANKIE L	FB4
Atlanta, GA	IG	KEITH PORTER HOME INSULATION INC	FB4
Atlanta, GA	IG	MC CAMPBELL, DON DBA MUSIMATIC INC	FB4
Atlanta, GA	IG	QUALITY L P GAS CO	FB4
Atlanta, GA	IG	TOMMY GRIFFIN PLUMBING CO INC	FB4
Baltimore, MD	IG	A & B GENERAL CONTRACTORS INC	FB4
Baltimore, M D	I G	ACTIVE CRANE RENTAL INC	FB4
Baltimore, MD	IG	AERO CORPORATION	FB4
Baltimore, MD	IG	ALL SEASONS HEATING AND AIR CONDITIONING INC	FB4
Baltimore, MD	IG	ALLEN PETROLEUM CORPORATION	FB4
Baltimore, MD	IG	ANTIETAM CONSTRUCTION INC	FB4
Baltimore, M D	I G	AUTOCON INC	FB4
Baltimore, MD	IG	BAR VELL INC	F B 4
Baltimore, MD	IG	BENFIELD ELECTRIC COMPANY INC	FB4
Baltimore, M D	I G	BOSTIC, RICHARD	FB4
Baltimore, MD	IG	BRANDYWINE NURSERIES INC	FB4
Baltimore, MD	IG	BURNS ALUMINUM	FB4
Baltimore, MD	IG	BURNS INTERNATIONAL SECURITY SERVICES	FB4
Baltimore, MD	IG	COMMUNICATIONS EXPRESS INC	FB6
Baltimore, MD	IG	COMMUNICATIONS FACILITIES	FB4
Baltimore, M D	I G	CROWN AMERICAN PROPERTIES L p	FB4
Baltimore, MD	IG	D S D SERVICES INC	FB4
Baltimore, MD	IG	DAUPHIN DEPOSIT BANK&TRUST CO	FB4
Baltimore, MD	IG	DELAWARE COUNTY TRANSPORTATION CONSORTIUM INC	FB4
Baltimore, MD	IG	DELAWARE ELECTRIC SIGNAL INC	FB4
Baltimore, MD	IG	DELCOLLO ELECTRIC	FB4
Baltimore, MD	I G	DICK CLOW GENERAL CONTRACTING INC	FB4
Baltimore, MD	IG	DOVER DOWNS INC	FB6
Baltimore, M D	IG	DOVER DOWNS INC	FB4
Baltimore, MD	IG	EAGLE NURSERY INC	FB4
Baltimore, M D	I G	EARL W H MERCER & SONS INC	FB4
Baltimore, MD	IG	EDGEWATER FARMS INC	FB4
Baltimore, MD	IG	EVANS JR, CLIFF	FB4
Baltimore, MD	IG	FEDIRKO, NICHOLAS	FB6

Baltimore, MD	IG	FIRST STATE COMMUNICATION SYSTEMS INC	FB6
Baltimore, MD	IG	FISHER, M S	FB4
Baltimore, MD	IG	FOX POOL CORP	FB4
Baltimore, MD	IG	'FULMER, BRIAN K:LEAMAN, J DAVID DBA RENOVATIONS	FB4
Baltimore, MD	IG	GARDEN SPOT ELECTRIC INC	FB4
Baltimore, MD	IG	GROFT,-GEORGE	FB4
Baltimore, MD	IG	H L BOWMAN INC	FB4
Baltimore, MD	IG	HARLAND J SHOEMAKER & SON INC	FB4
Baltimore, MD	IG	HEITZMAN EQUIPMENT INC	FB4
Baltimore, MD	IG	HENDERSON WEBB INC	F B 4
Baltimore, MD	IG	'HENDRIX, BRYAN NICHOLAS	FB4
Baltimore, MD	IG	HYMAN ELECTRIC	FB4
Baltimore, MD	IG	J MARION BRYAN &SONS INC	F B 4
Baltimore, MD	IG	JENNEY, MARSHALL W	FB4
Baltimore, MD	IG	JOHNS LABOR GROUP INC	FB4
Baltimore, MD	IG	L C HOHNE CONTRACTORS INC	FB4
Baltimore, MD	IG	L H STEWART INC	FB4
Baltimore, MD	IG	MASTER SECURITY INC	FB4
Baltimore, MD	IG	MC CRORY CORPORATION	FB4
Baltimore, MD	IG	MODERN EQUIPMENT RENTALS	FB4
Baltimore, MD	IG	'MULLIGAN & GRIFFIN PROPERTY MANAGERS INC	'FB4
Baltimore, MD	IG	MUMMERT, RICHARD C	F B 4
Baltimore, MD	IG	NEWTON ASPHALT CO INC OF VA	FB4
Baltimore, MD	IG	OVERHEAD DOOR COMPANY OF WASHINGTON DC	FB4
Baltimore, MD	IG	'OVERLOOKEN MEADOWS FARM COMPANY INC	FB4
Baltimore, MD	IG	OWINGS & SONS INC	FB4
Baltimore, MD	IG	PAULS, JAMES E	FB4
'Baltimore, MD	IG	PIKEWAY TOWING	FB4
Baltimore, MD	IG	R E SANDERS PLUMBING HEATING PUMPS INC	FB4
Baltimore, MD	IG	RENTAL TOOLS INC	FB4
Baltimore, MD	IG	RITCHEY, COOLIDGE	FB4
Baltimore, MD	IG	'SERVICE FEED AND SUPPLY INC	FB4
Baltimore, MD	IG	'SOUTHERN STATES	FB4
Baltimore, MD	IG	VOGT, R K	FB4
'Baltimore, MD	IG	'W&W ELECTRIC CO INC	'FB4
Baltimore, MD	IG	W F LEE INC	FB4
Baltimore, MD	IG	WASHINGTON WOODWORKING CO INC	'FB4
Baltimore ,MD	IG	WESTLEY, D O N A L D M	F B 4
Baltimore, MD	IG	WOODWARD, WALLACE D	FB4
Buffalo, NY	IG	ALUMINUM GUTTERS INC	FB4
Buffalo, NY	IG	ATTICA PACKAGE CO INC	FB4
Buffalo, NY	IG	CONGDON &WELLER WHOLESALE NURSERY INC	FB4
'Buffalo, NY	IG	EASTERN SUMMIT DEVELOPMENT INC	FB4
Buffalo, NY	IG	GALANTE CONCRETE CONSTRUCTION	FB4
Buffalo, NY	IG	HAMLIN JR, DAVID	FB4
Buffalo, NY	IG	HASELEY TRUCKING CO INC	FB4

Buffalo, NY	IG	HUMANE SOCIETY OF ROCHESTER AND MONROE COUNTY	FB4
Buffalo, NY	IG	HUNT JR, CLIFFORD J	FB4
Buffalo, NY	IG	JOHN SIXT & SON INC	FB4
Buffalo, NY	IG	MAC DONALD, ROBERT DBA MAC DONALD ELECTRIC	FB4
Buffalo, NY	IG	MICHAEL C SERAFINI INC	FB4
Buffalo, NY	IG	SANDY KNOLL FARMS INC --	FB4
Buffalo, NY	IG	SKY HARBOR SALES INC	F B 4
Buffalo, NY	IG	STEINBERG, LEAH B	FB4
Buffalo, NY	IG	TWIN LAKES CONSTRUCTION CO	FB4
Buffalo, NY	IG	WC ROBERSON PLUMBING & CONSTRUCTION	FB4
Buffalo, NY	IG	WINDYMERE MARINE INC	FB4
Charlotte, NC	IG	BELK STORES SERVICES INC	FB4
Charlotte, NC	IG	CAPE FEAR TRUCKING OF DALLAS INC	FB4
Charlotte, NC	IG	CONTRACT HAULING	FB4
Charlotte, NC	IG	D & D ASPHALT PAVING &TRUCKING INC	FB4
Charlotte, NC	IG	DEEP CREEK FARMS	FB4
Charlotte, NC	IG	GAGLE, ROBERT:RITCHIE, JOHN DBA GREENTHUMB NURSERY	FB4
Charlotte, NC	IG	GASTONIA SHEET METAL WORKS INC	FB4
Charlotte, N C	I G	GOSSETTS LANDSCAPE NURSERY INC	FB4
Charlotte, NC	IG	GUILFORD SECURITY AGENCY INC	FB4
Charlotte, NC	IG	KIKERS PLUMBING SERVICE INC	FB4
Charlotte, NC	IG	M L WINCHESTER GRADING	FB4
Charlotte, NC	IG	MC WHIRTER GRADING CO INC	FB4
Charlotte, NC	IG	MOORE TOM 0	FB4
Charlotte, N C	I G	NORTH-CAROLINA MOTOR SPEEDWAY INC	FB4
Charlotte, NC	IG	NORTHWESTERN ELECTRONICS	FB4
Charlotte, NC	IG	S&W CHEMICALS INC	FB4
Charlotte, NC	IG	STANDARD HEATING &A/C CO INC	FB4
Charlotte, NC	IG	THOMAS PETROLEUM CO INC	FB4
Chicago, IL	IG	ALS SERVICE CENTER INC	FB4
Chicago, IL	IG	ARROW MESSENGER SERVICE	FB4
Chicago, IL	IG	BERNHARD, LEO	FB4
Chicago, IL	IG	BROWNING FERRIS	FB4
Chicago, IL	IG	BRUMMEL, RICHARD A	FB4
Chicago, IL	IG	CANNONBALL INC	FB4
Chicago, IL	IG	COMO INN	FB4
Chicago, IL	IG	FERRI, -DAN DBA DANS TV	FB4
Chicago, IL	IG	FRIEDERS, GENE	F B 4
Chicago, IL	IG	HERBERT & HELEN MYERS FARMS INC	FB4
Chicago, IL	IG	HINSDALE NURSERIES INC	FB4
Chicago, IL	IG	HUNT WESSON INC	FB4
Chicago, IL	IG	J B COMMUNICATIONS INC	FB4
Chicago, IL	IG	LOWE EXCAVATING -CO INC	FB4
Chicago, IL	IG	MEADOWS MENNONITE RETIREMENT COMMUNITY	FB4
Chicago, IL	IG	PFEIFER, ALLEN	FB4
Chicago, IL	IG	PINKERTON	FB4

Chicago, IL	IG	RADIO TOWER REPEATER OF DUPAGE INC	FB6
Chicago, IL	IG	VHF COMMUNICATIONS INC	FB4
Chicago, IL	IG	WERNER CO	FB4
Cleveland, OH	IG	BAK, VINCENT	FB6
Cleveland, OH	IG	CLEMENTE, DONALD M	FB4
Cleveland, OH	IK	COMMUNICATION LEASING INC	FB6C
Cleveland, OH	IG	COMMUNICATION LEASING INC	F B 4
Cleveland, OH	IG	FIRIS, PAMELA S	FB6
Cleveland, OH	IG	FIRIS, PAMELA S	FB4
Cleveland, OH	IG	FITZGERALD TELECOMMUNICATIONS INC	FB4
Cleveland, OH	YK	LUXENBERG, FRED	FB8C
Cleveland, OH	IG	OLMSTED COMMUNICATIONS	FB6
Cleveland, OH	IG	PARKER BROS WELL DRILLING INC	FB4
Cleveland, OH	IG	RADIO LINK COMMUNICATIONS INC	FB4
Cleveland, OH	IG	RJ HEATING & COOLING SERVICE	FB4
Columbus, OH	IG	BEACHY, NELSON:BEACHY, SANFORD DBA NELSON AND SANFORD BEACHY	FB4
Columbus, OH	IG	BIG O REFUSE	FB4
Columbus, OH	IG	FAIRBORN PLUMBING & HEATING CO	F B 4
Columbus, OH	IG	HOLIDAY INN COLUMBUS NORTHWEST	FB4
Columbus, OH	IG	KIRK, ROGER	FB4
Columbus, OH	IG	KNOWLTON CONSTRUCTION COMPANY	FB4
Columbus, OH	IK	LEE, JOHN C	FB6C
Columbus, OH	IG	MASTER APPLIANCE	FB4
Columbus, OH	YG	P&R COMMUNICATION SERVICE INC	FB8
Columbus, OH	YG	P&R COMMUNICATION SERVICE INC	FX1
Columbus, OH	IG	PICA CORPORATION INC	FB4
Columbus, OH	IG	REICHERT FARM DRAINAGE INC	FB4
Columbus, OH	IG	RHODES FURNITURE CO	FB4
Columbus, OH	IG	RINKER, RICHARD:RINKER, ROBERT DBA RINKER BROTHERS	FB4
Columbus, OH	IG	ROGER THOMPSON FARMS	FB4
Columbus, OH	YG	STALEY COMMUNICATIONS INC	FB8
Columbus, OH	IG	TIME WARNER ENTERTAINMENT COMPANY L P	FB4
Columbus, OH	IG	WEDDING BROTHERS CORPORATION	FB4
Dallas, TX	IG	A QUALITY POOLS INC	FB4
Dallas, TX	IG	BECO SERVICE INC	FB4
Dallas, TX	IG	C & B ASSOCIATES INC	FB4
Dallas, TX	IK	CSSI	FB6C
Dallas, TX	IG	IBE, RAYMOND	FB4
Dallas, TX	IG	KUBAN, JIM	FB4
Dallas, TX	IG	WOODIE WOODS PLUMBING & HARDWARE INC	FB4
Dallas, TX	IG	WYNNEWOOD VILLAGE SHOPPING CENTER	FB4
Detroit, MI	IG	ALDINGBROOK APARTMENTS	FB4
Detroit, MI	IG	BARTHEL CONTRACTING	FB4
Detroit, MI	IG	BLUE CROSS AND BLUE SHIELD OF MICHIGAN	FB4
Detroit, MI	IG	E S WAGNER COMPANY	FB4
Detroit, MI	IG	FAIRLANE FORD SALES INC	FB4

Detroit, MI	IG	GAGLIANOS TOWING INC	FB4
Detroit, MI	IG	GENERAL MOBILE RADIO SERVICES INC	FB4
Detroit, MI	IG	HEATH JR, ALBERT TED	FB4
Detroit, MI	IG	INTERNATIONAL INDUSTRIAL CONTRACTING CORPORATION	FB4
Detroit, MI	IG	INTERSTATE HEATING & COOLING	FB4
Detroit, MI	IG	LACOURE BROTHERS INC	FB4
Detroit, MI	IG	MILLER, W GORDON	FB4
Detroit, MI	IG	MONROE DOOR SALES & SERVICE INC	FB4
Detroit, MI	IG	ORCHARD HILTZ & MC CLIMENT INC	FB4
Detroit, MI	IG	PRICE FUNERAL HOME INC	FB4
Detroit, MI	IG	RADIO LINK COMMUNICATIONS INC	FB4
Detroit, MI	IG	REGULATED RESOURCE RECOVERY INC	FB4
Detroit, MI	IG	SEAWAY SAND & STONE CORP	FB4
Detroit, MI	IG	SHAFER, TERRY	FB4
Detroit, MI	IG	TRI COUNTY SECURITY	FB4
Detroit, MI	IG	TROY ELECTRIC INC	FB4
Detroit, MI	IG	UNI DIG INC	FB4
Detroit, MI	IG	WALSH COLLEGE	FB4
Detroit, MI	IG	WAYNE DISPOSAL INC	FB4
Detroit, MI	IG	WELLING, GARY I	FB4
Detroit, MI	IG	ZIMMERMAN, DAVE	FB4
Houston, TX	IG	AERO AG SERVICES INC	FB4
Houston, TX	IG	FAST COURIER SERVICE INC	FB4
Houston, TX	IG	HILDEBRANDTS WATER WELLS & REPAIR SERVICE	FB4
Houston, TX	IK	INTERCONNECT TELE COMMUNICATIONS CORP	FB6C
Houston, TX	IG	LUMBERTON TOWER SERVICE	FB4
Houston, TX	IG	MUNDY INDUSTRIAL MAINTENANCE	FB4
Houston, TX	IG	PLANK COMPANY	FB4
Houston, TX	IG	SANJAC SECURITY SPECIALISTS INC	FB4
Houston, TX	IG	SECURITYLINK FROM AMERITECH INC	FB4
Houston, TX	IG	SOUTHWEST UTILITIES CORPORATION	FB4
Houston, TX	IG	TAYLOR, WALTER A:GARZA, WILLIE DBA W & W LEASING	FB4
Houston, TX	IG	VALLEN INC DBA VALLEN SAFETY SUPPLY CO	FB4
Los Angeles, CA	IG	AAA ASPHALT PAVING INC	FB4
Los Angeles, CA	IG	ANAHEIM MARRIOTT HOTEL	FB4
Los Angeles, CA	IG	AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA	FB4
Los Angeles, CA	IG	CALIFORNIA COMMERCE CLUB	FB4
Los Angeles, CA	IK	CARRIER COMMUNICATIONS	FB6
Los Angeles, CA	IG	CONNOLLY, FORREST	FB4
Los Angeles, CA	IG	COUFAL, DONALD:ISLEY, KENNETH DBA COUFAL ISLEY SOUND	FB6
Los Angeles, CA	IG	COYAL & SON	FB4
Los Angeles, CA	IG	CRAWFORD, JAMES L	FB6
Los Angeles, CA	IG	ECHO COMMUNICATIONS	FB4
Los Angeles, CA	IG	ELSINORE READY MIX COMPANY	FB4
Los Angeles, CA	IG	EVERGREEN LANDSCAPE MANAGEMENT	FB4
Los Angeles, CA	IG	EXCEL SECURITY SERVICES INC	FB4

Los Angeles, CA IG	FOUNDATION PILE INC	FB4
Los Angeles, CA IG	HESLEP, TY DBA PJU TELECOMM	FB4
Los Angeles, CA IG	JLC COMMUNICATIONS SITES	FB6
Los Angeles, CA IG	JOHN A THOMAS CRANE & TRUCKING CO INC	FB4
Los Angeles, CA IG	K E CURTIS CONSTRUCTION COMPANY INC	Fi34
Los Angeles, CA IG	KASPER, L A R R Y	FB4
Los Angeles, CA IK	KAY JR, JAMES A	FB6C
Los Angeles, CA IG	LAIDLAW TRANSIT	FB4
Los Angeles, CA IG	MOBILE RELAY ASSOCIATES INC	FB6
Los Angeles, CA IG	NATIONAL SCIENCE AND TECHNOLOGY NETWORK INC	FB6
Los Angeles, CA IG	PAMS THE DELIVERY SERVICE	FB4
Los Angeles, CA IG	PEDUS SECURITY SERVICES INC	FB4
Los Angeles, CA IG	RURAL COMMUNICATIONS COMPANY	FB4
Los Angeles, CA IG	SALAS IRRIGATION INC	FB4
Los Angeles, CA IG	SCHAEFER AMBULANCE SERVICE INC	FB4
Los Angeles, CA IK	SOBEL, MARC	FB6C
Los Angeles, CA IG	URANGA LANDSCAPE SERVICE	FB4
Los Angeles, CA IG	VICTORVILLE DISPOSAL INC	FB4
Memphis, TN IG	BUGMOBILE OF ARKANSAS INC	FB4
Memphis, TN IG	CONDAIRE INC	FB4
Memphis, TN IG	DESOTO COUNTY CO OP	FB4
Memphis, TN IG	HENDERSON PEST CONTROL INC	FB4
Memphis, TN IG	MEMPHIS BRAKE SERVICE INC	F B 4
Memphis, T N I G	MORRISETT, CHARLES	FB4
Memphis, TN IG	POHLNER, ROGER	FB4
Memphis, TN IG	ROSE CONSTRUCTION INC	FB4
Memphis, TN IG	SANDERS, JOHN	FB4
Memphis, TN IG	SOUTHERN COMPANY INC	FB4
Memphis, TN IK	WOOD COMMUNICATIONS	FB6C
New York, NY IG	A & J INSTALLATION INC	FB4
New York, NY IG	A D ANGELO GLASS & MIRRORS INC	F B 4
New York, NY IG	A NARDOZZA JR TRUCKING INC	FB4
New York, NY IG	A R DEMARCO ENTERPRISES INC	FB4
New York, NY IG	ACCENT COMMUNICATIONS	FB4
New York, NY IG	AGWAY INC	FB4
New York, NY IG	AGWAY PETROLEUM CORP	FB4
New York, NY IG	AIRACOM SERVICES GROUP INC	FB4
New York, NY I G	AMERICAN BRIDGE CO	FB4
New York, NY IG	ANGELO VILLANI & SONS INC	FB4
New York, NY IG	ASTORIA RUBBISH REMOVAL CO INC	FB4
New York, NY IG	B PIETRINI & SONS INC	FB4
New York, NY IG	BAZLEN PLUMBING & HEATING INC	FB4
New York, NY IG	BRIGGS ELECTRIC INC	FB4
New York, NY IG	BROOKWOOD TOWING DBA BROOKWOOD BODY SHOP LTD	FB4
New York, NY IG	BUDGET FUEL CO INC	FB4
New York, NY IG	CMC EQUIPMENT RENTAL SERVICE INC	FB4

New York, NY	IG	COLONNADE APARTMENTS LTD	FB4
New York, NY	IG	CORBIN FARMS INC	FB4
New York, NY	IG	DANNER, ROY	FB4
New York, NY	IG	EASTERN STATES WELL DRILLERS INC	FB4
New York, NY	IG	EDGERTON INC	FB4
New York, NY	IG	EUGENE-T PARZYCH INC	FB4
New York, NY	IG	FLORES AIR CONDITIONING INC	FB4
New York, NY	IG	GIBERSON, DAN	FB4
New York, NY	IG	GREEN MEADOWS LANDSCAPING INC	FB4
New York, NY	IG	H EBERHARD NURSERIES	FB4
New York, NY	IG	HAINES AND HAINES'INC	FB4
New York, NY	IG	INTER COUNTY BUILDING MATERIALS CORP	FB4
New York, NY	IG	INTERBORO CAR SERVICE INC	FB4
New York, NY	IG	J & H SLATER CONSTRUCTION	FB4C
New York, NY	IG	J & H SLATER CONSTRUCTION	FB4
New York, NY	IG	JONACH ELECTRONICS INC	FB4
New York, NY	IG	JOSEPH CARDUCCI INC	FB4
New York, NY	IG	JULIO, MANUEL	FB4
New York, NY	IG	LIBERTY SOD FARMS	FB4
New York, NY	IG	LONERGAN, DON DBA LEHIGH VALLEY LANDSCAPE	FB4
New York, NY	IG	MAURER & SCOTT SALES INC	FB4
New York, NY	IG	MEREL, SAM	FB4
New York, NY	IG	METROCOM SERVICES INC	FB4
New York, NY	IG	PHILADELPHIA GERIATRIC CENTER	FB4
New York, NY	IG	PULLEN, DAVID	FB4
New York, NY	IG	R V YOUNG FUEL	FB4
New York, NY	IG	SEA CREST CONSTRUCTION CORP	FB4
New York, NY	IG	SEUGLING, CHRIS	FB4
New York, NY	IG	SHELTER SYSTEMS HOME BUILDERS	FB4
New York, NY	IG	SLATTERY SKANSKA INC	FB4
New York, NY	IG	TELMOBILE INC	FB6
Philadelphia, PA	IG	A & B GENERAL CONTRACTORS INC	FB4
Philadelphia, PA	IG	A NARDOZZA JR TRUCKING INC	FB4
Philadelphia, PA	IG	A R DEMARCO ENTERPRISES INC	FB4
Philadelphia, PA	IG	ACTIVE CRANE RENTAL INC	FB4
Philadelphia, PA	IG	AGWAY PETROLEUM CORP	FB4
Philadelphia, PA	IG	ANGELO VILLANI & SONS INC	FB4
Philadelphia, PA	IG	AUTOCON INC	FB4
Philadelphia, PA	IG	B PIETRINI & SONS INC	FB4
Philadelphia, PA	IG	BEATTY CONTRACTORS & WRECKERS LTD	FB4
Philadelphia, PA	IG	BOSTIC, RICHARD	FB4
Philadelphia, PA	IG	BRANDYWINE NURSERIES INC	F B 4
Philadelphia, PA	IG	BROOKWOOD TOWING DBA BROOKWOOD BODY'SHOP Lid	FB4
Philadelphia, PA	IG	BUDGET FUEL CO INC	FB4
Philadelphia, PA	IG	CMC EQUIPMENT RENTAL SERVICE INC	FB4
Philadelphia, PA	IG	COLONNADE APARTMENTS LTD	FB4

Philadelphia, PA	IG	D & D SERVICES INC F B 4
Philadelphia, PA	IG	DANNER, ROY FB4
Philadelphia, PA	IG	DELAWARE COUNTY TRANSPORTATION CONSORTIUM INC FB4
Philadelphia, PA	IG	DELAWARE ELECTRIC SIGNAL INC FB4
Philadelphia, PA	IG	DELCOLLO ELECTRIC FB4
Philadelphia, PA	IG	DOVER DOWNS INC FB6
Philadelphia, PA	IG	DOVER DOWNS INC FB4
Philadelphia, PA	IG	EAGLE NURSERY INC FB4
Philadelphia, PA	IG	EDGEWATER FARMS INC FB4
Philadelphia, PA	IG	EUGENE T PARZYCH INC FB4
Philadelphia, PA	IG	FEDIRKO, NICHOLAS FB6
Philadelphia, PA	IG	FIRST STATE COMMUNICATION SYSTEMS INC FB6
Philadelphia, PA	IG	FISHER, M S FB4
Philadelphia, PA	IG	FLORES AIR CONDITIONING INC FB4
Philadelphia, PA	IG	FOX POOL CORP FB4
Philadelphia, PA	IG	GARDEN SPOT ELECTRIC INC FB4
Philadelphia, PA	IG	GEORGES PLUMBING &HEATING FB4
Philadelphia, PA	IG	GIBERSON, DAN FB4
Philadelphia, PA	IG	HAINES AND HAINES INC FB4
Philadelphia, PA	IG	HANSEN, FREDERICK A FB4
Philadelphia, PA	IG	HEITZMAN EQUIPMENT INC FB4
Philadelphia, PA	IG	JEM COMMUNICATIONS CO FB4
Philadelphia, PA	IG	JENNEY, MARSHALL W FB4
Philadelphia, PA	IG	JONACH ELECTRONICS INC FB4
Philadelphia, PA	IG	'JULIO, MANUEL FB4
Philadelphia, PA	IG	LIBERTY SOD FARMS 'FB4
Philadelphia, PA	I G	LONERGAN, DON DBA LEHIGH VALLEY LANDSCAPE FB4
Philadelphia, PA	IG	MAURER & SCOTT SALES INC FB4
'Philadelphia, PA	IG	"MC CRORY CORPORATION FB4
Philadelphia, PA	IG	'MODERN EQUIPMENT RENTALS FB4
Philadelphia, PA	IG	OWINGS & SONS INC FB4
Philadelphia, PA	IG	PAULS, JAMES E FB4
Philadelphia, PA	IG	PENCOR SERVICES INC F B 4
Philadelphia, PA	IG	PHILADELPHIA GERIATRIC CENTER FB4
Philadelphia, PA	IG	PULLEN, DAVID FB4
Philadelphia, PA	IG	R V YOUNG FUEL FB4
Philadelphia, PA	IG	RONALD E KISTLER PLUMBING & HEATING INC FB4
Philadelphia, PA	IG	SERVICE FEED AND SUPPLY INC FB4
Philadelphia, PA	I G	SEUGLING, CHRIS FB4
Philadelphia, PA'	IG	SHELTER SYSTEMS HOME BUILDERS FB4
Philadelphia, PA	IG	SOUTHERN STATES FB4
Philadelphia, PA	IG	TU WAY MOBILE COMMUNICATIONS FB4
Philadelphia, PA	IG	VALLEY FORGE MED CENTER HOSPITAL FB4
'Philadelphia, PA	IG	VOGT, R K FB4
Philadelphia, P A	IG	WESTLEY, DONALD M FB4
Richmond, VA'	IG	A-i FRANK JR AND CO INC' FB4

Richmond, VA IG	AMERICAN APPLICATORS INC	FB4
Richmond, VA IG	BILL TALLEY FORD	FB4
Richmond, VA IG	BLUE RIBBON REALTY INC	FB4
Richmond, VA IG	BURGESS, JOHN J	FB4
Richmond, VA IG	CARDAN CONSTRUCTION	FB4
Richmond, VA IG	CARLS RADIATOR SERVICE INC	FB4
Richmond, VA IG	COLONIAL SECURITY SERVICE INC	FB4
Richmond, VA IG	COMMUNICATIONS FACILITIES	FB4
Richmond, VA IG	COMMUNICATIONS PLUS INC	FB4
Richmond, VA IG	COMPASS GROUP USA INC	FB4
Richmond, VA IG	CONTRACTING ENTERPRISES INC	FB4
Richmond, VA IG	FALCON CABLEVISION A CALIFORNIA LIMITED PARTNERSHIP	FB4
Richmond, VA IG	FELHC INC	F B 4
Richmond, VA IG	OVERHEAD DOOR COMPANY OF WASHINGTON DC	FB4
Richmond, VA IG	SW RAWLS INC	FB4
Richmond, VA IG	SCHINDLER ELEVATOR CORP DBA SCHINDLER ELEVATOR CORP	FB4
Richmond, VA IK	TELPAGE INC	FB6C
Richmond, VA IG	VIRGINIA SUBURBAN WATER SUPPLY	FB4
Richmond, VA IG	WC LANG & SON INC	FB4
Rochester, NY IG	ALUMINUM GUTTERS INC	FB4
Rochester, NY IG	ATTICA PACKAGE CO INC	FB4
Rochester, NY IG	BLEWETT TIRE SERVICE	FB4
Rochester, NY IG	CAMILUS RESIDENTIAL HEALTH CARE FACILITY INC	FB4
Rochester, NY IG	CHEMUNG COMMUNICATIONS CORP	FB4
Rochester; NY IG	EASTERN SUMMIT DEVELOPMENT INC	FB4
Rochester, NY IG	GALANTE CONCRETE CONSTRUCTION	FB4
Rochester, NY IG	HAMLIN JR, DAVID	FB4
Rochester, NY IG	HASELEY TRUCKING CO INC	FB4
Rochester, NY IG	HUMANE SOCIETY OF ROCHESTER AND MONROE COUNTY	FB4
Rochester, NY IG	HUNT JR, CLIFFORD J	FB4
Rochester, NY IG	JOHN SIXT & SON INC	FB4
Rochester, NY IG	MAC DONALD, ROBERT DBA MAC DONALD ELECTRIC	FB4
Rochester, NY IG	MICHAEL C SERAFINI INC	FB4
Rochester, NY IG	SANDY KNOLL FARMS INC	FB4
Rochester, NY IG	SKY HARBOR SALES INC	FB4
Rochester, NY IG	STEINBERG, LEAH B	FB4
Rochester, NY IG	TWIN LAKES CONSTRUCTION CO	FB4
Rochester, NY IG	w c ROBERSON PLUMBING & CONSTRUCTION	FB4
Rochester, NY IG	WINDYMERE MARINE INC	FB4
Salt Lake City, UT IG	ARNOLD COMMERCIAL PROPERTIES INC	FB4
Salt Lake City, UT IG	ASSOCIATED TITLE Oi= DAVIS COUNTY	FB4
Salt Lake City, UT IG	BARBIERI, ALLEN L:PRICE, KENT V DBA VALLEY SERVICE TOWING	FB4
Salt Lake City, UT IG	CET ENVIRONMENTAL	FB4

Salt Lake City, UT	IG	CHRISTENSEN & GRIFFITH	F B 4
Salt Lake City, UT	IG	EUGENE MORGAN & SON EXCAVATING INC	FB4
Salt Lake City, UT	IG	GLOBAL COATINGS INC	FB4
Salt Lake City, UT	IG	KIM JOHNSON EXCAVATING INC	FB4
Salt Lake City, UT	IG	ROBINSON FANS WEST	FB4
Salt Lake City, UT	IG	TRICOR AMERICA INC	FB4
San Diego, CA	IG	ANAHEIM MARRIOTT HOTEL	FB4
San Diego, CA	IG	ARMSTRONG FARMS INC	FB4
San Diego, CA	IG	AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA	FB4
San Diego, CA	IG	AUZA, MARTIN	FB4
San Diego, CA	IG	C&C GLASS COMPANY INC	FB4
San Diego, CA	IG	CLARKLIFT OF EL CENTRO	FB4
San Diego, CA	IG	COYAL & SON	F B 4
San Diego, CA	IG	DOOSE LANDSCAPE INC	F B 4
San Diego, CA	IG	DOUBLE AA PARKING & TRUCKING INC	F B 4
San Diego, CA	IG	DUGGINS CONSTRUCTION INC	FB4
San Diego, CA	IG	DUNE COMPANY IMPERIAL VALLEY	FB4
San Diego, CA	IG	ECHO COMMUNICATIONS	FB4
San Diego, CA	IG	ELSINORE READY MIX COMPANY	FB4
San Diego, CA	IG	EXCEL SECURITY SERVICES INC	FB4
San Diego, CA	IG	FOUNDATION PILE INC	FB4
San Diego, CA	IG	GROSSMONT HOSPITAL	FB4
San Diego, CA	IG	:HESLEP, TY DBA PJU TELECOMM	FB4
San Diego, CA	IG	'HUTCHINGS, JESS	F B 4
San Diego, CA	IG	JLC COMMUNICATIONS SITES	FB6
San Diego, CA	IG	'JOHN A THOMAS CRANE & TRUCKING CO INC	iFB4
San Diego, CA	IG	LAIDLAW TRANSIT	FB4
San Diego, CA	IG	M ARRIETA & SON INC	'FB4
'San Diego, CA	IG	OCEAN HILLS COUNTRY CLUB HOMEOWNERS ASSOCIATION	FB4
San Diego, CA	IG	UKEGAWA BROTHERS FARM	FB4
San Francisco, CA	IG	APEX WIRELESS INC	FB6
San Francisco, CA	IG	CABRILLO FARMS INC	FB4
San Francisco;*' CA	IG	CHARLES MARTIN & ASSOCIATES	FB6
'San Francisco, CA	IG	CNF TRANSPORTATION INC	FB4
San Francisco, CA	IG	CRANE OF UKIAH INC	FB4
,San Francisco, CA	IG	DRISCOLL, DONALD F	jFB4
San Francisco,.' 'CA	IG	E K EXCAVATING INC	FB4

San Francisco, CA	IG	F & S FARMS	FB4
San Francisco, CA	IG	F W RAYE CO INC	F B 4
San Francisco, CA	IG	FRANCISCAN VINEYARDS INC	FB4
San Francisco, CA	IG	GIBLIN, JERE A	FB4
San Francisco, CA	IG	GOLDEN STATE UTILITY CO	FB4
San Francisco, CA	IK	GRONEMEIER, JOHN H	FB6C
San Francisco, CA	IK	GRONEMEIER, JOHN H	FB6
San Francisco, CA	IG	GUENOC WINERY INC	FB4
San Francisco, CA	IG	HOMEWOOD SUITES	FB4
San Francisco, CA	IK	LUBRATICH, TOM	FB6
San Francisco, CA	IG	M L BRUNER CO	FB4
San Francisco, CA	IG	MERCK SHARP-& DOHME	FB4
San Francisco, CA	IK	METROCALL USA INC	FB6
San Francisco, CA	IG	MOBILE RADIO ENGINEERS LLC DBA DAY WIRELESS SYSTEMS	FB6
San Francisco, CA	IG	MULROONEY, ED	FB4
San Francisco, CA	IG	OGRADY PAVING INC	FB4
San Francisco, CA	IG	PATIN, MITCHELL	FB4
San Francisco, CA	IG	ROBERT YOUNG VINEYARDS INC	FB4
San Francisco, CA	IG	ROYAL VOLVO	FB4
San Francisco, CA	IG	TAL	FB4
San Francisco, CA	IG	WELBORN, ROBERT:WELBORN, WILLIAM DBA WELBORN BROS PLUMBING	FB4
Tampa, FL	IG	*ASHLEY, JOHN W	FB4
Tampa, FL	IG	BAY AREA A C & APPLIANCE INC	FB4
Tampa, FL	IG	COMMUNICATIONS GROUP INC	FB4
Tampa, FL	IG	CZM CORPORATION	FB4
Tampa, FL	IG	DANNENHOFFER, RAY	FB4
Tampa, FL	IG	FALKNER, JOHN	FB4
Tampa, FL	IG	FESTIVAL TOURS	FB4
Tampa, FL	IG	FX LIGHTING INC DBA FX SCENERY & DISPLAY INC	FB4
Tampa, FL	IG	GENERAL SECURITY AND INVESTIGATIONS	FB4
Tampa, FL	IG	HARRIS, VAN W	FB4

Tampa, FL	IG	HOUSING AUTHORITY OF ORLANDO	FB4
Tampa, FL	IG	STUBBS, JAMES E	FB6
Tampa, FL	IK	TRI CO COMMUNICATIONS INC	FB6C
Tampa, FL	IG	WESTERN SECURITY DBA 3 TS AUTOMOTIVE SERVICES	FB4
Washington, DC	IG	A & B GENERAL CONTRACTORS INC	FB4
Washington, DC	IG	ALL SEASONS HEATING AND AIR CONDITIONING INC	FB4
Washington, DC	IG	ALLEN PETROLEUM CORPORATION	FB4
Washington, DC	IG	ANTIETAM CONSTRUCTION INC	FB4
Washington, DC	IG	BAR VELL INC	FB4
Washington, DC	IG	BENFIELD ELECTRIC COMPANY INC	FB4
Washington, DC	IG	BOSTIC, RICHARD	FB4
Washington, DC	IG	BURNS ALUMINUM	F B 4
Washington, DC	IG	BURNS INTERNATIONAL SECURITY SERVICES	FB4
Washington, DC	IG	COMMUNICATIONS EXPRESS INC	F B 6
Washington, DC	IG	COMMUNICATIONS FACILITIES	F B 4
Washington, DC	IG	CONTRACTING ENTERPRISES INC	FB4
Washington, DC	IG	CULPEPER PETROLEUM COOPERATIVE INC	F B 4
Washington, DC	IG	D & D SERVICES INC	FB4
Washington, DC	IG	DELAWARE ELECTRIC SIGNAL INC	FB4
Washington, DC	IG	DICK CLOW GENERAL CONTRACTING INC	FB4
Washington, DC	IG	DOVER DOWNS INC	FB6
Washington, DC	IG	DOVER DOWNS INC	FB4
Washington, DC	IG	EARL W H MERCER &SONS INC	FB4
Washirigton, DC	IG	EDGEWATER FARMS INC	FB4
Washington, DC	IG	FEDIRKO, NICHOLAS	FB6
Washington, DC	IG	FIRST STATE COMMUNICATION SYSTEMS INC	FB6
Washington, DC	IG	FOX POOL CORP	FB4
Washington, DC	IG	GARDEN SPOT ELECTRIC INC	F B 4
Washington, DC	IG	GROFT, GEORGE	F B 4
Washington, DC	IG	HARLAND J SHOEMAKER & SON INC	FB4
Washington, DC	IG	HENDERSON WEBB INC	FB4
Washington, DC	IG	HENDRIX, BRYAN NICHOLAS	FB4
Washington, DC	IG	HYMAN ELECTRIC .	FB4
Washington, DC	IG	J MARION BRYAN & SONS INC	FB4
Washington, DC	IG	JOHNS LABOR GROUP INC	FB4
Washington, DC	IG	L C HOHNE CONTRACTORS INC	F B 4
Washington, DC	IG	L H STEWART INC	FB4
Washington, DC	IG	MASTER SECURITY INC	F B 4
Washington, DC	IG	MC CRORY CORPORATION	FB4
Washington, DC	IG	MULLIGAN & GRIFFIN PROPERTY MANAGERS INC	F B 4
Washington, DC	IG	MUMMERT, RICHARD C	FB4
Washington, DC	IG	NEWTON ASPHALT CO INC OF VA	FB4
Washington, DC	IG	OVERHEAD DOOR COMPANY OF WASHINGTON DC	FB4
Washington, DC	IG	OVERLOOKEN MEADOWS FARM COMPANY INC	FB4
Washington, DC	IG	OWINGS & S O N S I N C	FB4
Washington, DC	IG	PAULS, J A M E S E	FB4

Washington, DC	IG	PIKEWAY TOWING	FB4
Washington, DC	IG	R E SANDERS PLUMBING HEATING PUMPS INC	FB4
Washington, DC	IG	RENTAL TOOLS INC	FB4
Washington, DC	IG	SERVICE FEED AND SUPPLY INC	FB4
Washington, DC	IG	SOUTHERN STATES	FB4
Washington, DC	IG	VIRGINIA SUBURBAN WATER SUPPLY	FB4
Washington, DC	IG	W & W ELECTRIC CO INC	FB4
Washington, DC	IG	W F LEE INC	FB4
Washington, DC	IG	WASHINGTON WOODWORKING CO INC	FB4
Washington, DC	IG	WOODWARD, WALLACE D	FB4
Wichita, KS	IG	ANDALE FARMERS CO OP	FB4
Wichita, KS	IG	FARMERS COOP ASSOCIATION	FB4
Wichita, KS	IG	NOAHS BUILDING SERVICE INC	FB4
Wichita, KS	IG	SHOFFNER, DANNY	FB4
Wichita, KS	IG	SMITH, DWIGHT C	FB4

1/

RADIO SERVICE CODE

IG	**Industrial/Business Pool - Non-Commercial, Conventional**
IK	**Industrial/Business Pool - Commercial, Conventional**
YG	**Industrial/Business Pool - Non-Commercial,** Trunked
YK	**Industrial/Business Pool - Commercial,** Trunked

CLASS STATION CODE

FB4	**Community Repeater**
FB4C	**Community Repeater - Interconnect**
FB6	**Private Carrier (profit)**
FB6C	**Private Carrier (profit) - Interconnect**
FB8	**Private Carrier Centralized Trunking (profit)**
FB8C	**Private Carrier Centralized Trunking (profit) -** Interconnect
FX1	**Control**

PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION
445 12th Street, S.W., TW-A325
WASHINGTON, DC 20554

DA 01-467

News media information 202/418-0500 Fax-On Demand 2021418.2830 Internet: http://www.fcc.gov ftp.fcc.gov

Released: February 21, 2001

WIRELESS TELECOMMUNICATIONS BUREAU GRANTS REQUEST OF JOSEPH J. SIMONS, ESQ., TRUSTEE, TO EXTEND DIVESTITURE TRUST

Pursuant to sections 4(i) and 310(d) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 310(d), and sections 0.331 and 20.6 of the Commission's rules, 47 C.F.R. §§ 0.331, 20.6, the Wireless Telecommunications Bureau grants the request of Joseph J. Simons, Esq., Trustee, to extend for 180 days the duration of the wireless asset divestiture trusts involving PCS license WPQL237 held by Chicago 20 MHz, LLC, and PCS license KNLF236 held by GTE Wireless Cincinnati LLC. No comments were received in response to the public notice of this request. See Joseph J. Simons, Trustee, Seeks Extension of Wireless Assets Trust, *Public Notice*, DA 01-208 (WTB, rel. Jan. 26, 2001).

Pursuant to section 1.103 of the Commission's rules, 47 C.F.R. § 1.103, the consent granted herein is effective upon release of this Public Notice. Pursuant to sections 1.106(f) and 1.115(a) of the Commission's rules, 47 C.F.R. §§ 1.106(f), 1.115(a), petitions for reconsideration and applications for review may be filed within thirty days of the release of this public notice.

For further information, contact Lauren Kravetz or John Branscome, Wireless Telecommunications Bureau, Commercial Wireless Division, at (202) 41 8-7240.

-FCC-