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March 23, 1998

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VIA HAND DELIVERY

John P. Wong, Chief
Engineering and Technical Services Division
Cable Services Bureau
Federal Communications Commission
2033 M Street, N.W.
Washington, D.C. 20554

Cable Services Bureau

MAR 24 1998

Received

Re: GTE Media Ventures Incorporated
CAR Station WLY-476
FCC File No. CAR-47999-02 (as amended)
Response to Time Warner's Objection

Dear Mr. Wong:

This letter, transmitted on behalf of GTE Media Ventures Incorporated ("GTE"), is in response to Time Warner Entertainment Company, L.P., dba Oceanic Cablevision's ("Time Warner") March 16, 1998 objection to the above-captioned application. As set forth herein, this is a case of the filing party not having all of the pertinent facts and, therefore, a case where the objection can and should be denied immediately. More importantly, the FCC should continue to process and grant the pending application as expeditiously as possible in light of GTE's imminent digital launch.

Time Warner's objection alleges that GTE has operated the applied for modification prior to receiving FCC authority. What Time Warner did not know, however, is that GTE has conducted experiments/testing on the CARS equipment pursuant to the authority of a valid experimental license issued to GTE's equipment vendor, Cable AML. Attached hereto as Exhibits 1 and 2 respectively is a declaration from Cable AML's co-founder and Vice President, Norman Woods, and a copy of the experimental license granted to Cable AML. Mr. Woods makes it clear that it is not unusual for customers to rely on Cable AML's experimental license and, in fact, that is why Cable AML has the license.

GTE has not operated the CARS station or the equipment on a commercial basis. Moreover, no party has complained of any interference since the time GTE (with

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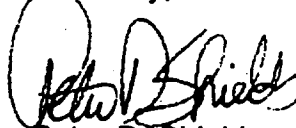
Cable AML's consent) began its experiments on the equipment. Attached hereto as Exhibit 3 is a Declaration of William Biagini, a GTE engineer with GTE Laboratories, attesting to GTE's use of the experimental license and explaining the testing that has occurred to date.

GTE acquired its wireless cable assets from the previous operator in Honolulu, Hawaii last May. Even prior to the closing of the transaction, GTE was doing preliminary work to prepare for a conversion of the system from analog to digital transmission technology. Not surprisingly, the only incumbent cable company is seeking to delay GTE's launch and slow the arrival of competition in Hawaii by bringing what it views as a "smoking gun" to the FCC's attention. As demonstrated, however, there is no fire in this case, but rather a case of one party not being privy to all the relevant facts.

GTE respectfully requests the FCC to deny the objection and continue processing the pending application to grant as expeditiously as possible. GTE has gone to great lengths to comply with the FCC's rules and policies as you are aware based on our meetings on this proposed digital launch.

If you have any questions regarding this matter, please contact the undersigned counsel for GTE.

Sincerely,



Peter D. Shields

Enclosure

cc: Sunil Daluvoy, Esq.
Michael Lance, Esq.
John Wilner, Esq.

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