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FAX COVER PAGE

Subject : Metro Telecom, Inc. (File No. 0008-EX-P/L-1998)

Comments:

Doug,

Attached please find a letter summarizing and confirming the information I conveyed to you in our telephone conversation yesterday. Please note that I have also included a signed verification of this letter from the applicant. The facsimile copy of the applicant's verification is being tendered, and the original signature will be supplied upon receipt. As with the amendment, the original and requisite copies of this item are being filed through the Office of the Secretary. This fax is a courtesy copy for your convenience.

As always, don't hesitate to call me if you have any more questions or require any additional information or assistance.

Bob

To: Doug Young

From : Bob Keller

Fax Number : 1-202-418-1918

Pages including cover page: 4

Date : 3/26/99

Time : 6:27:58 AM

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March 25, 1999

Mr. Douglas Young
Allocations and Standards Division
Office of Engineering and Technology
Federal Communications Commission
Washington, D.C. 20554

RECEIVED
MAR 26 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re: Metro Telecom, Inc. (FCC File No. 0008-EX-P/L-1998)

Dear Mr. Young:

This is in response to your request for additional information regarding the reference in the application to limited market testing.

Out of an abundance of caution, the applicant seeks authority for limited market studies, pursuant to Section 5.93 of the Commission's Rules and Regulations, 47 C.F.R. § 5.93, even though that terminology and that rule section may not be strictly applicable. Applicant already provides equipment and/or service to users under regular (i.e., non-experimental) facilities authorized by the Commission. While the experimental program proposed in the above-referenced application will involve some of these customers, the customers will not be provided with any additional equipment and will not be charged any additional fees.

As explained in the application, the experimental transmissions on the splits between the air-ground mobile channels will be from applicant's base stations. Accordingly, the customers' mobile units will not transmit on the experimental frequencies. Applicant will program the customers' mobile units so that they will be able to *receive* base-to-mobile transmissions on the experimental frequencies, but no change will be made to customers' mobile equipment insofar as mobile-to-base *transmissions* are concerned. The modified base station equipment will be owned by the applicant. Ownership of the customers' mobile equipment will not change from what it currently is. Customers will be informed that they are participating in an experimental program; no additional fees will be charged to customer in connection with the experimental program; and customers' will have the right to decline or terminate participation in the experimental program at any time. Finally, the scope of the experimental program is limited. While applicant intends, if this test proves successful, to seek rule changes necessary to regularize this approach at airports (and other possible RF-intensive campus environments) throughout the nation, the application seeks authority limited to the three airports in the New York City area.

ORIGINAL

Mr. Douglas Young
March 25, 1999
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For the reasons set forth in the preceding paragraph it is respectfully submitted that the requirements of Section 5.93 of the Commission's Rules and Regulations, if it is even applicable, are fully satisfied by the program and procedures proposed by applicant. It is therefore respectfully requested that you process and grant this application as expeditiously as possible.

Kindly direct any questions or correspondence concerning this matter to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert J. Keller", with a stylized flourish at the end.

Robert J. Keller
Counsel for Metro Telecom, Inc.

Verification

I, Gary G. Schumacher, President of Metro Telecom, Inc., hereby verify that the information set forth in the above letter from legal counsel to Mr. Douglas Young is true and accurate and is offered in good faith.

Gary G. Schumacher

Date

Mr. Douglas Young
March 25, 1999
Page 2

For the reasons set forth in the preceding paragraph it is respectfully submitted that the requirements of Section 5.93 of the Commission's Rules and Regulations, if it is even applicable, are fully satisfied by the program and procedures proposed by applicant. It is therefore respectfully requested that you process and grant this application as expeditiously as possible.

Kindly direct any questions or correspondence concerning this matter to the undersigned.

Very truly yours,



Robert J. Keller
Counsel for Metro Telecom, Inc.

Verification

I, Gary G. Schumacher, President of Metro Telecom, Inc., hereby verify that the information set forth in the above letter from legal counsel to Mr. Douglas Young is true and accurate and is offered in good faith.


Gary G. Schumacher

3/25/99
Date