

WirelessCo, LP

11/7/96

Mod. to add frequencies 1850-1910, 1930-1990

~~(Need special condition for coord w/ microwave users)~~

EXHIBIT 1

WirelessCo, L.P. is the permittee of the below-listed experimental authorizations. This application seeks to modify all of the below-listed authorizations as described in Exhibit 2.

CALL SIGN	FCC FILE NO.	NEW FILE NO.	AREA OF OPERATION
WA2XBQ	5272-EX-PL-96	5551-EX-ML-96	Birmingham MTA
WA2XCG	5288-EX-PL-96	5552-EX-ML-96	Boston-Providence MTA
WA2XCQ	5298-EX-PL-96	5553-EX-ML-96	Buffalo-Rochester MTA
WA2XCF	5287-EX-PL-96	5554-EX-ML-96	Dallas-Ft. Worth MTA
WA2XBZ	5281-EX-PL-96	5555-EX-ML-96	Denver MTA
WA2XCN	5295-EX-PL-96	5556-EX-ML-96	Des Moines-Quad Cities MTA
WA2XCE	5286-EX-PL-96	5557-EX-ML-96	Detroit MTA
WA2XBS	5274-EX-PL-96	5558-EX-ML-96	Indianapolis MTA
WA2XCP	5297-EX-PL-96	5559-EX-ML-96	Kansas City MTA
WA2XCK	5292-EX-PL-96	5560-EX-ML-96	Little Rock MTA
WA2XCB	5283-EX-PL-96	5561-EX-ML-96	Louisville-Lexington-Evansville MTA
WA2XBU	5276-EX-PL-96	5562-EX-ML-96	Miami-Ft. Lauderdale MTA
WA2XBX	5279-EX-PL-96	5563-EX-ML-96	Milwaukee MTA
WA2XBT	5275-EX-PL-96	5564-EX-ML-96	Minneapolis-St. Paul MTA
WA2XCH	5289-EX-PL-96	5565-EX-ML-96	Nashville MTA
WA2XBV	5277-EX-PL-96	5566-EX-ML-96	New Orleans-Baton Rouge MTA
WA2XCC	5284-EX-PL-96	5567-EX-ML-96	New York MTA
WA2XCL	5293-EX-PL-96	5568-EX-ML-96	Oklahoma City MTA
WA2XBY	5280-EX-PL-96	5569-EX-ML-96	Pittsburgh MTA
WA2XBP	5271-EX-PL-96	5570-EX-ML-96	Phoenix MTA
WA2XBR	5273-EX-PL-96	5571-EX-ML-96	Portland MTA

CALL SIGN	FCC FILE NO.	NEW FILE NO.	AREA OF OPERATION
WA2XBW	5278-EX-PL-96	5572-EX-ML-96	St. Louis MTA
WA2XCR	5299-EX-PL-96	5573-EX-ML-96	Salt Lake City MTA
WA2XCO	5296-EX-PL-96	5574-EX-ML-96	San Antonio MTA
WA2XCD	5285-EX-PL-96	5575-EX-ML-96	San Francisco-Oakland-San Jose MTA
WA2XCA	5282-EX-PL-96	5576-EX-ML-96	Seattle MTA
WA2XCM	5294-EX-PL-96	5577-EX-ML-96	Spokane-Billings MTA
WA2XCJ	5291-EX-PL-96	5578-EX-ML-96	Tulsa MTA
WA2XCI	5290-EX-PL-96	5579-EX-ML-96	Wichita MTA

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EXHIBIT NO. 2
FCC Form 442
Items 4, 10, 13 and 15

WirelessCo, L.P. ("WirelessCo"), licensee of the personal communications services ("PCS") stations and experimental authorizations set forth on Exhibit 1 (the "Authorizations"), hereby requests that the Authorizations be modified as discussed in this Exhibit. The proposed modification concerns only one element of the Authorizations: the proposed frequencies. In all other particulars, the Authorizations would not be modified at all.^{1/}

In granting each of the Authorizations, the Commission specified as frequencies for the Authorizations the same frequencies that WirelessCo already was authorized to utilize pursuant to its PCS licenses (either Block A or Block B, as the case may be in each major trading area). Although this grant has permitted WirelessCo to accomplish some of the planning that accompanies construction of PCS systems, it has not permitted WirelessCo to plan its spectrum use in areas where its commercially licensed spectrum is consumed by microwave interference. WirelessCo initially had sought authority to utilize for its experimental operations all the frequencies in the licensed PCS band in each market (coordinating, of course, with incumbent microwave users and other PCS licensees). In this application, WirelessCo makes a further showing of need for the frequencies it requested initially and agrees to accept a condition requiring additional frequency coordination.

WirelessCo requests the ability to utilize frequencies from 1850-1910 MHz and 1910-1990 MHz for experimental purposes to permit it to plan system build-out in areas where the frequencies in the spectrum block for which it holds a commercial PCS license is blocked by microwave congestion. WirelessCo plans, of

^{1/} In response to Items 13 and 15 of FCC Form 442, WirelessCo proposes no change in the transmitting equipment to be utilized under each of the Authorizations. A sample copy of one of WirelessCo's original experimental applications is attached for the convenience of the staff.

course, primarily to utilize for planning purposes the spectrum for which WirelessCo holds a commercial license and for which the Commission already has granted the Authorizations. But it is crucial that WirelessCo have access to frequencies in the licensed PCS band for which it does not hold a commercial license for temporary planning purposes in cases where microwave congestion prevents it from using the frequencies for which it holds a commercial license. Otherwise, microwave relocation might delay system planning and, in turn, delay the provision of highly demanded PCS services to the public. WirelessCo anticipates that its use of frequencies outside the block for which it holds a commercial license in each market will be sparing, but the use of such spectrum would be absolutely necessary in those cases where microwave congestion blocks WirelessCo from testing with its commercially licensed frequencies.

WirelessCo would utilize frequencies outside its commercially licensed block only on a temporary basis and only after coordinating with the PCS licensee that holds a license for the spectrum to be temporarily utilized. That spectrum would not be used to construct experimental facilities, but rather to project temporary test signals and measure signal propagation using portable testing equipment. Accordingly, WirelessCo agrees to accept an additional condition suggested by the staff that WirelessCo be required to coordinate operations with microwave users and PCS service providers to avoid interferences.

The grant of this modification application will serve the public interest by furthering the Commission's goal of implementing competitive PCS as expeditiously as possible by permitting WirelessCo to effectively plan and construct its PCS systems. A vitally important part of the process of planning and constructing the PCS system is a determination of the optimum location and tower height for PCS base stations. In areas where WirelessCo's commercially licensed spectrum is blocked by microwave interference and the incumbents causing such interference have not yet been relocated, WirelessCo must temporarily utilize frequencies in the licensed PCS spectrum that are outside of its licensed frequencies. Modifying the Authorizations to permit WirelessCo

to use these frequencies will speed the provision of PCS service to the public and thus serve the public interest.

Expedited Treatment Requested. WirelessCo intends to provide service to a substantial portion of the population in its service area before the end of 1996. This goal cannot be accomplished unless WirelessCo can move quickly and efficiently in its planning and construction processes. The grant of this request will permit WirelessCo to move quickly toward providing a highly demanded competitive service in its service areas. Because early accomplishment of these efforts is in the public interest and is necessary to the achievement of WirelessCo's service goals, we respectfully request that the Commission expedite the consideration of this request.