

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Applications for A and B Block Broadband) File Nos. 00001-CW-L-95
PCS Licenses) through 00099-CW-L-95;
) Call Signs KNLF 204 through KNLF 302

ORDER

Adopted: June 23, 1995

Released: June 23, 1995

By the Chief, Wireless Telecommunications Bureau:

I. INTRODUCTION

1. In a Petition to Deny and Request for Stay, filed on May 12, 1995, the National Association of Black Owned Broadcasters ("NABOB"), Percy E. Sutton ("Sutton"), and the Washington Bureau of the National Association for the Advancement of Colored People ("NAACP") (collectively, "Petitioners") jointly request that the Commission deny the applications of all the winners of the Commission's auction of 99 broadband PCS licenses for the A and B block MTA frequencies. In the alternative, Petitioners seek to stay licensing of the A and B block winning bidders until the Commission is ready to license the eventual winning bidders of the PCS C block auction.¹ Petitioners also have filed an Application for Review and Request for Stay of the April 12, 1995 *Order* by the Chief, Wireless Telecommunications Bureau, denying a previously filed motion by Communications One, Inc. to defer A and B block licensing.²

2. In this Order, we deal exclusively with the Petition to Deny filed by Petitioners against the A and B block auction winners. We conclude that the Petition should be denied and order

¹ Petition at 9-10, 14-18. Petitioners' stay request violates Section 1.44(e) of the Commission's rules, 47 CFR § 1.44(e), which requires that a request for stay of any decision or order of the Commission must be filed as a separate pleading or it will not be considered. Accordingly, we dismiss this portion of the Petition as procedurally defective. In any event, the arguments in favor of a stay raised in the Petition are duplicated in Petitioners' separately filed Application for Review and Request for Stay, and are therefore fully addressed by our separate Order denying that application.

² Application for Review and Request for Stay, filed May 12, 1995. See *Deferral of Licensing of MTA Commercial Broadband PCS, Order*, PP Docket No. 93-253, DA 95-806 (Wireless Telecom. Bur., released April 12, 1995).

that the applications be granted.³ In a separate order adopted today, we deny Petitioners' Application for Review and Request for Stay, as well as a similar petition for reconsideration and stay of A and B block licensing filed jointly by Communications One, Inc. and GO Communications Corporation.⁴

II. CONTENTIONS OF THE PARTIES

3. NABOB states that it is a national trade organization "representing the interests of current FCC licensees . . . and prospective minority applicants in the PCS auctions," and contends that it is a party in interest to the A and B block applications on this basis.⁵ Sutton claims to be a potential bidder in the C block auction. NAACP claims to represent both the interests of minority entrepreneurs who plan to bid in the C block auction and the interests of the public, which NAACP claims will be harmed "if the PCS industry does not develop into an open competitive industry."⁶

4. In support of their petition, Petitioners contend that the Commission violated Section 309(j) of the Communications Act by failing to provide adequate opportunities for minorities to acquire PCS licenses in the A and B blocks.⁷ Petitioners further assert that this failure to provide incentives has allowed a few dominant carriers to divide A and B block PCS licenses in an unlawful territorial allocation in violation of the antitrust laws.⁸ Petitioners contend that the distribution of licenses in the top markets indicates a pattern of collusion by these carriers to

³ A list of the granted licenses is set forth in Appendix A. In separate Orders adopted today, we also deny the following petitions to deny filed against individual A and B block auction winners: (1) Petition of WirelessCo, L.P. to Deny or Condition License Grant, filed May 12, 1995 against Pacific Telesis Mobile Services for the San Francisco B block MTA (File No. 0006-CW-L-95); (2) Petition of Cox Enterprises, Inc. to Deny or Condition License Grant, filed May 12, 1995 against Pacific Telesis Mobile Services for the Los Angeles B block MTA (File No. 0002-CW-L-95); and (3) four Joint Petitions to Dismiss or Deny, Without Prejudice, or, in the Alternative, to Defer, filed May 12, 1995, by Advanced MobileComm Technologies, Inc. and Digital Spread Spectrum Technologies, Inc. against (a) WirelessCo for the San Francisco A Block MTA (File No. 0005-CW-L-95), (b) Pacific Telesis Mobile Services for the San Francisco B block MTA (File No. 0006-CW-L-95); (c) AT&T Wireless PCS for the Boston A Block MTA (File No. 0013-CW-L-95), and (d) WirelessCo for the Boston B block MTA (File No. 0014-CW-L-95). See *Order*, DA 95-1412 (Wireless Telecom. Bur., released June 23, 1995) (AMT/DSST Petition); *Order*, DA 95-1413 (Wireless Telecom. Bur., released June 23, 1995) (Cox Petition); *Order*, DA 95-1414 (Wireless Telecom. Bur., released June 23, 1995) (WirelessCo Petition). We incorporate these Orders herein by reference.

⁴ Deferral of Licensing of MTA Commercial Broadband PCS, *Order*, DA 95-1410 (Wireless Telecom. Bur., released June 23, 1995).

⁵ Petition at 2.

⁶ *Id.*

⁷ *Id.* at 9-10.

⁸ *Id.* at 10-12.

"dominate the wireless telephone industry, both PCS and cellular." Petitioners further note that "several of the companies engaged in these partnerships are not new to U.S. Justice Department antitrust inquiry."⁹

5. Virtually all of the winning A and B block bidders have filed oppositions to the Petition to Deny.¹⁰ Opponents present three main arguments: (1) petitioners are not parties in interest and therefore lack standing to file the Petition¹¹; (2) the Petition is an untimely attempt to seek further reconsideration of the Commission's PCS auction rules¹²; (3) Petitioners' allegations of collusion among the major A and B block auction winners are vague, unsupported by any factual showing, and do not even purport to apply to most of the auction winners.¹³

6. In their reply to the oppositions, Petitioners argue that they have demonstrated the existence of sufficient circumstantial evidence of anticompetitive conduct by A and B block auction winners to warrant an investigation of the winners' conduct by the Commission before licenses are granted. Petitioners state that they cannot be expected to produce a "smoking gun" without compulsory process.¹⁴ Petitioners' reply does not address opponents' arguments that Petitioners lack standing or that their allegations of territorial allocation do not pertain to all of the winning bidders.

III. DISCUSSION

7. After review of Petitioners' contentions and the other pleadings in this matter, we dismiss the Petition to Deny. First, we conclude that Petitioners have failed to demonstrate

⁹ *Id.* at 12-13.

¹⁰ Oppositions were filed by American Portable Telecommunications, Ameritech Wireless Communications, AT&T Wireless PCS, BellSouth Personal Communications, Centennial Cellular Corporation, Communications International Corporation, Cox Communications, GCI Communications Corporation, GTE Macro Corporation, Pacific Telesis Mobile Services, PCS Primeco, PhillieCo (jointly with WirelessCo), Powertel PCS Partners, South Seas Satellite Communications Corporation, Western PCS Corporation, and WirelessCo (jointly with PhillieCo).

¹¹ *See, e.g.*, BellSouth Opposition at 2-3, Centennial Cellular Opposition at 2-3, Communications International Opposition at 2, Powertel PCS Opposition at 4, PCS Primeco Opposition at 3-7, WirelessCo Opposition at 4-6.

¹² *See, e.g.*, Ameritech Wireless Opposition at 4-5, AT&T Wireless Opposition at 8, Cox Opposition at 3-6, GCI Opposition at 6, Powertel PCS Opposition at 5, Western PCS Opposition at 6-7, WirelessCo Opposition at 6-13.

¹³ *See, e.g.*, Ameritech Wireless Opposition at 6, Centennial Cellular Opposition at 4-6, Communications International Opposition at 5-6, GTE Macro Opposition at 4-7, Pacific Telesis Opposition at 9, PCS Primeco Opposition at 7, 15-19, South Seas Opposition at 2, WirelessCo Opposition at 13-15.

¹⁴ Petitioners' Reply at 6.

standing to challenge all of the A and B block applicants. Second, even assuming Petitioners have standing, we conclude that they have failed to demonstrate that grant of the A and B block licenses would be inconsistent with the public interest.

A. Standing

8. To establish standing to file a petition to deny, the petitioner must allege sufficient facts to demonstrate that a grant of the subject application would cause the petitioner to suffer a direct injury.¹⁵ The petition must further demonstrate a causal link between the claimed injury and the challenged action by establishing that (1) the injury "fairly can be traced" to the challenged action, and (2) the injury would be prevented or redressed by the relief requested.¹⁶ Petitioner Sutton claims standing to petition against the A and B block applicants based on his status as a potential C block bidder. Petitioners NABOB and NAACP claim to represent the interests of members who are potential PCS bidders as well as the interests of the public.

9. We conclude that Petitioners have failed to allege facts sufficient to establish standing to challenge all of the A and B block applicants on a blanket basis, as they seek to do here. The premise of Petitioners' standing argument is that the award of licenses to the A and B block applicants threatens Petitioners' interests (or those of their members) as potential C block licensees as well as the interests of the public. We find these allegations to be too contingent and speculative to support the required finding of a direct injury causally linked to the challenged action. First, there is no certainty that Petitioners or any of their members will in fact participate in the C block auction, or that they will win licenses if they do bid, both of which must occur in order for the claimed injury even to be possible. The Commission has previously found that the mere fact that a petitioner has *applied* to be a competing licensee of the applicant does not confer standing.¹⁷ In this instance, Petitioners have not yet even applied for licenses, much less obtained them. We also find Petitioners' claims to represent the "public" to be far too vague and conclusory to establish standing.

10. Even if we assume that possible competition between the Petitioners and A and B block applicants would be sufficient to establish standing, Petitioners have not provided specific factual allegations to establish a causal link between their prospective injuries and the grant of

¹⁵ *AmericaTel Corporation*, 9 FCC Rcd 3993, 3995 (1994) (citing *Sierra Club v. Morton*, 405 U.S. 727, 733 (1972)).

¹⁶ *Id.* (citing *Duke Power Co. v. Carolina Environmental Study Group, Inc.*, 428 U.S. 59, 74, 81 (1978)).

¹⁷ See *Pittsburgh Partners, L.P.*, 10 FCC Rcd 2715 (1994), para. 4 (mere status as applicant in one proceeding does not confer standing as a party in interest in another proceeding); *WIBF Broadcasting*, 17 F.C.C. 2d 876, 877 (1969) (same).

each A and B block application. In order to challenge the A and B block auction winners in every MTA, Petitioners must at the very least allege facts showing how each and every grant would result in some demonstrable injury to them. The broad and conclusory affidavits provided by Petitioners fail to meet this standard: petitioner Sutton states only that he intends to bid in the C block auction, without specifying any market, while petitioners NABOB and NAACP fail to identify or provide affidavits from even a single member of their organizations who intends to bid.¹⁸ Thus, Petitioners have alleged no causal link between any prospective C block bidder and granting the application of any particular A or B block auction winner. For these reasons, we conclude that Petitioners have not established standing to file the Petition against all A and B block licensees.¹⁹ We will, however, consider the Petition as an informal objection to the applications.

B. Public Interest Analysis

11. Aside from the issue of standing, we conclude that Petitioners have failed to demonstrate that grant of the A and B block applications would be inconsistent with the public interest. Under Section 309(d)(1) of the Communications Act, parties filing a petition to deny must make specific allegations of fact sufficient to show that a grant of the application would be *prima facie* inconsistent with the public interest, convenience, and necessity.²⁰ Except where official notice may be taken, such allegations must be supported by affidavits of persons with personal knowledge of the facts alleged.²¹ Section 309(d)(2) states that if the pleadings and affidavits fail to raise substantial and material questions of fact and the Commission concludes that grant of the application would be in the public interest, the Commission shall deny the petition.²² Based on the pleadings and supporting materials before us, we find that Petitioners have failed to raise substantial and material questions of fact under this standard.

12. Petitioners' primary argument in support of denial of the A and B block licenses is that the Commission did not adopt specific provisions for minorities to bid for PCS licenses in

¹⁸ Petition, Declarations of Percy E. Sutton, James L. Winston, and Wade J. Henderson.

¹⁹ While we conclude that Petitioners have failed to allege sufficient facts to establish standing, we do not rule out the possibility that a potential PCS bidder could allege facts sufficient to establish standing to challenge another PCS application.

²⁰ *Astroline Comm. Co. L.P. v. FCC*, 857, F.2d 1556, 1561 (D. C. Cir. (1988), quoting 47 U.S.C. § 309(d)(1).

²¹ 47 U.S.C. § 309(d)(1).

²² *Id.*, § 309(d)(2).

the A and B blocks, which Petitioners contend violates Section 309(j) of the Act.²³ Opponents argue that this argument constitutes an untimely petition for reconsideration of the Commission's broadband PCS auction rules rather than a valid basis for a petition to deny.²⁴ We agree. The purpose of the petition to deny process is to assess challenges to applicants' qualifications to be Commission licensees. Petitioners' statutory argument does not address licensee qualifications, however, but challenges the structure of the A and B block auction itself. This is not grounds for a petition to deny, but is a belated attempt to revisit the Commission's auction rules for licensing of the A and B blocks. In the *Fifth Report and Order* in Docket 93-253, the Commission decided against making special provisions for designated entities on the A and B blocks. Instead, the Commission determined that a more meaningful way to create opportunities for designated entities was by designating the C and F blocks as "entrepreneurs' blocks."²⁵ The Commission determined that this approach fully complied with Section 309(j), and affirmed this conclusion on reconsideration more than eight months ago.²⁶ Petitioners' attempt to challenge the rules again through the petition to deny process is therefore untimely and procedurally improper.

13. The only other argument offered by Petitioners is that some A and B block applicants may have engaged in an illegal "territorial allocation" of licenses.²⁷ In support of this claim, Petitioners note that the three winners of the largest numbers of A and B block licenses -- AT&T Wireless PCS, PCS Primeco, and WirelessCo -- are newly merged entities or joint ventures of established communications companies. Petitioners suggest that the formation of these ventures and the pattern of bidding provide "circumstantial evidence" that these entities colluded to divide up the PCS market by refraining from bidding in markets where their bidding partners had existing communications interests.²⁸ Petitioners also allege that RBOC-affiliated bidders deliberately avoided bidding against one another in the auction.²⁹

²³ Petition at 9-10.

²⁴ See, e.g., Cox Opposition at 3.

²⁵ Implementation of Section 309(j) of the Communications Act, Competitive Bidding, *Fifth Report and Order*, PP Docket No. 93-253, 9 FCC Rcd 5532, 5584-5588 (1994), paras. 118-127.

²⁶ Implementation of Section 309(j) of the Communications Act, Competitive Bidding, *Fifth Memorandum Opinion and Order*, PP Docket No. 93-253, 10 FCC Rcd 403, 412-414 (1994), paras. 10-16.

²⁷ Petition at 10-13.

²⁸ *Id.*; Petitioners' Reply at 6.

²⁹ Petition at 12.

14. We find that Petitioners have failed to raise a substantial or material question of fact based on these allegations. First, Petitioners offer no grounds whatsoever for denying the applications of the fifteen auction winners *other* than AT&T, PCS Primeco, and WirelessCo. Second, with respect to these latter three applicants, Petitioners fail to provide any factual evidence of collusion. While we agree with Petitioners that a "smoking gun" is not required to support a petition to deny, this does not excuse Petitioners from the requirement to provide some modicum of a factual showing that collusion occurred -- particularly in an auction that lasted over three months and resulted in aggregate winning bids of nearly \$8 billion. In this respect, we find Petitioners' conclusory allegations to be wholly inadequate. Petitioners raise no factual issue that AT&T, PCS Primeco, WirelessCo, or any other A or B block winner has violated *any* of the Commission's rules, including the collusion rules or the rules regarding aggregation of PCS spectrum. Indeed, as PCS Primeco points out, much of the bidding behavior alluded to by Petitioners was *required* by the Commission's cellular cross-ownership rules, which prohibited bidders with cellular interests from bidding for PCS licenses in those markets.³⁰

15. Finally, we are unpersuaded by Petitioners' argument that the Petition should be granted on the ground that some of the entities who formed AT&T Wireless, PCS Primeco, and WirelessCo have been subject to past Department of Justice antitrust inquiry.³¹ Petitioners have failed to show that the creation of any of these entities is in any way illegal or contrary to the public interest. In fact, both the Department of Justice and the Commission approved the AT&T/McCaw merger, as Petitioners acknowledge.³² The formation of PCS Primeco and WirelessCo also complied with Commission rules, and the Department of Justice has not lodged an objection to either transaction. Because Petitioners have failed to allege, much less provide evidence of, any facts that raise an issue in this regard, we conclude that Petitioners' have failed to present a substantial or material question of fact in support of their Petition.

IV. CONCLUSION

16. Having reviewed the applications and the pleadings filed in this matter, we conclude that grant of the subject applications will serve the public interest, convenience, and necessity, and that Petitioners have not sufficiently alleged facts establishing that grant of the application would be inconsistent with the public interest, convenience, and necessity.

³⁰ Primeco Opposition at 17. See 47 C.F.R. §24.204(a).

³¹ Petition at 13-14.

³² Applications of Craig O. McCaw and American Telephone & Telegraph Company for Consent to the Transfer of Control of McCaw Cellular Communications, Inc. and its Subsidiaries, 9 FCC Rcd 5836 (1994).

V. ORDERING CLAUSES

17. Accordingly, pursuant to Section 309(d) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(d), IT IS ORDERED that the Petition to Deny and Request for Stay filed by the National Association of Black Owned Broadcasters, Percy E. Sutton, and the Washington Bureau of the National Association for the Advancement of Colored People IS DENIED.

18. IT IS FURTHER ORDERED that, pursuant to Section 309(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(a), the applications for Broadband Personal Communications Services MTA Licenses listed in Appendix A are GRANTED, effective the date of this Order.

FEDERAL COMMUNICATIONS COMMISSION

Regina M. Keeney
Chief, Wireless Telecommunications Bureau

APPENDIX A

MARKET	FILE NUMBER	APPLICANT	CALL SIGN
M001	00001-CW-L-95	WIRELESSCO, L.P.	KNLF204
M002	00002-CW-L-95	PACIFIC TELESIS MOBILE SERVICES	KNLF205
M003	00004-CW-L-95	PCS PRIMECO, L.P.	KNLF207
M003	00003-CW-L-95	AT&T WIRELESS PCS INC.	KNLF206
M004	00005-CW-L-95	WIRELESSCO, L.P.	KNLF208
M004	00006-CW-L-95	PACIFIC TELESIS MOBILE SERVICES	KNLF209
M005	00008-CW-L-95	WIRELESSCO, L.P.	KNLF211
M005	00007-CW-L-95	AT&T WIRELESS PCS INC.	KNLF210
M006	00009-CW-L-95	AT&T WIRELESS PCS INC.	KNLF212
M006	00010-CW-L-95	BELLSOUTH PERSONAL COMMUNICATIONS, INC.	KNLF213
M007	00011-CW-L-95	PCS PRIMECO, L.P.	KNLF214
M007	00012-CW-L-95	WIRELESSCO, L.P.	KNLF215
M008	00013-CW-L-95	AT&T WIRELESS PCS INC.	KNLF216
M008	00014-CW-L-95	WIRELESSCO, L.P.	KNLF217
M009	00016-CW-L-95	PHILLIECO, L.P.	KNLF219
M009	00015-CW-L-95	AT&T WIRELESS PCS INC.	KNLF218
M010	00017-CW-L-95	AT&T WIRELESS PCS INC.	KNLF220
M011	00018-CW-L-95	AT&T WIRELESS PCS INC.	KNLF221
M011	00019-CW-L-95	GTE MACRO COMMUNICATIONS CORPORATION	KNLF222
M012	00021-CW-L-95	APT MINNEAPOLIS, INC.	KNLF224
M012	00020-CW-L-95	WIRELESSCO, L.P.	KNLF223
M013	00022-CW-L-95	APT TAMPA/ORLANDO, INC.	KNLF225
M013	00023-CW-L-95	PCS PRIMECO, L.P.	KNLF226
M014	00025-CW-L-95	PCS PRIMECO, L.P.	KNLF228
M014	00024-CW-L-95	APT HOUSTON, INC.	KNLF227
M015	00026-CW-L-95	WIRELESSCO, L.P.	KNLF229
M015	00027-CW-L-95	PCS PRIMECO, L.P.	KNLF230
M016	00028-CW-L-95	AMERITECH WIRELESS COMMUNICATIONS, INC.	KNLF231
M016	00029-CW-L-95	AT&T WIRELESS PCS INC.	KNLF232
M017	00031-CW-L-95	PCS PRIMECO, L.P.	KNLF234
M017	00030-CW-L-95	WIRELESSCO, L.P.	KNLF233
M018	00032-CW-L-95	AT&T WIRELESS PCS INC.	KNLF235
M018	00033-CW-L-95	GTE MACRO COMMUNICATIONS CORPORATION	KNLF236
M019	00034-CW-L-95	AT&T WIRELESS PCS INC.	KNLF237
M019	00035-CW-L-95	WIRELESSCO, L.P.	KNLF238
M020	00037-CW-L-95	PCS PRIMECO, L.P.	KNLF240
M020	00036-CW-L-95	WIRELESSCO, L.P.	KNLF239
M021	00038-CW-L-95	WIRELESSCO, L.P.	KNLF241
M021	00039-CW-L-95	AMERICAN PORTABLE TELECOMMUNICATIONS, INC.	KNLF242
M022	00040-CW-L-95	WIRELESSCO, L.P.	KNLF243
M022	00041-CW-L-95	GTE MACRO COMMUNICATIONS CORPORATION	KNLF244
M023	00043-CW-L-95	PCS PRIMECO, L.P.	KNLF246
M023	00042-CW-L-95	AT&T WIRELESS PCS INC.	KNLF245
M024	00045-CW-L-95	WIRELESSCO, L.P.	KNLF248
M024	00044-CW-L-95	GTE MACRO COMMUNICATIONS CORPORATION	KNLF247
M025	00046-CW-L-95	AT&T WIRELESS PCS INC.	KNLF249
M025	00047-CW-L-95	CENTENNIAL CELLULAR CORP.	KNLF250
M026	00048-CW-L-95	AT&T WIRELESS PCS INC.	KNLF251

APPENDIX A

MARKET	FILE NUMBER	APPLICANT	CALL SIGN
M026	00049-CW-L-95	WIRELESSCO, L.P.	KNLF252
M027	00050-CW-L-95	AT&T WIRELESS PCS INC.	KNLF253
M027	00051-CW-L-95	WIRELESSCO, L.P.	KNLF254
M028	00052-CW-L-95	POWERTEL PCS PARTNERS, L.P.	KNLF255
M028	00053-CW-L-95	SOUTHWESTERN BELL MOBILE SYSTEM, INC.	KNLF256
M029	00054-CW-L-95	WIRELESSCO, L.P.	KNLF257
M029	00055-CW-L-95	POWERTEL PCS PARTNERS, L.P.	KNLF258
M030	00057-CW-L-95	WIRELESSCO, L.P.	KNLF260
M030	00056-CW-L-95	WESTERN PCS I CORPORATION	KNLF259
M031	00058-CW-L-95	WIRELESSCO, L.P.	KNLF261
M031	00059-CW-L-95	AMERITECH WIRELESS COMMUNICATIONS, INC.	KNLF262
M032	00061-CW-L-95	WIRELESSCO, L.P.	KNLF264
M032	00060-CW-L-95	WESTERN PCS I CORPORATION	KNLF263
M033	00063-CW-L-95	PCS PRIMECO, L.P.	KNLF266
M033	00062-CW-L-95	WIRELESSCO, L.P.	KNLF265
M034	00064-CW-L-95	WIRELESSCO, L.P.	KNLF267
M034	00065-CW-L-95	APT KANSAS CITY, INC.	KNLF268
M035	00067-CW-L-95	AT&T WIRELESS PCS INC.	KNLF270
M035	00066-CW-L-95	WIRELESSCO, L.P.	KNLF269
M036	00069-CW-L-95	WIRELESSCO, L.P.	KNLF272
M036	00068-CW-L-95	WESTERN PCS II CORPORATION	KNLF271
M037	00071-CW-L-95	PCS PRIMECO, L.P.	KNLF274
M037	00070-CW-L-95	POWERTEL PCS PARTNERS, L.P.	KNLF273
M038	00073-CW-L-95	APT COLUMBUS, INC.	KNLF276
M038	00072-CW-L-95	AT&T WIRELESS PCS INC.	KNLF275
M039	00074-CW-L-95	WESTERN PCS II CORPORATION	KNLF277
M039	00075-CW-L-95	AT&T WIRELESS PCS INC.	KNLF278
M040	00077-CW-L-95	WIRELESSCO, L.P.	KNLF280
M040	00076-CW-L-95	SOUTHWESTERN BELL MOBILE SYSTEM, INC.	KNLF279
M041	00079-CW-L-95	WIRELESSCO, L.P.	KNLF282
M041	00078-CW-L-95	WESTERN PCS I CORPORATION	KNLF281
M042	00081-CW-L-95	WIRELESSCO, L.P.	KNLF284
M042	00080-CW-L-95	POKA LAMBRO TELEPHONE COOPERATIVE, INC.	KNLF283
M043	00082-CW-L-95	WIRELESSCO, L.P.	KNLF285
M043	00083-CW-L-95	AT&T WIRELESS PCS INC.	KNLF286
M044	00084-CW-L-95	AT&T WIRELESS PCS INC.	KNLF287
M044	00085-CW-L-95	BELLSOUTH PERSONAL COMMUNICATIONS, INC.	KNLF288
M045	00087-CW-L-95	COX COMMUNICATIONS, INC.	KNLF290
M045	00086-CW-L-95	AT&T WIRELESS PCS INC.	KNLF289
M046	00089-CW-L-95	WIRELESSCO, L.P.	KNLF292
M046	00088-CW-L-95	AT&T WIRELESS PCS INC.	KNLF291
M047	00090-CW-L-95	WESTERN PCS II CORPORATION	KNLF293
M047	00091-CW-L-95	PCS PRIMECO, L.P.	KNLF294
M048	00093-CW-L-95	WIRELESSCO, L.P.	KNLF296
M048	00092-CW-L-95	SOUTHWESTERN BELL MOBILE SYSTEM, INC.	KNLF295
M049	00095-CW-L-95	GCI COMMUNICATION CORPORATION	KNLF298
M049	00094-CW-L-95	APT ALASKA, INC.	KNLF297
M050	00096-CW-L-95	POKA LAMBRO TELEPHONE COOPERATIVE, INC.	KNLF299

APPENDIX A

MARKET	FILE NUMBER	APPLICANT	CALL SIGN
M050	00097-CW-L-95	APT GUAM, INC.	KNLF300
M051	00099-CW-L-95	COMMUNICATIONS INTERNATIONAL CORPORATION	KNLF302
M051	00098-CW-L-95	SOUTH SEAS SATELLITE COMMUNICATIONS CORP.	KNLF301
File numbers 00056-CW-L-95, 00060-CW-L-95 and 00078-CW-L-95 have changed their name from Western PCS Corporation to Western PCS I Corporation.			
File numbers 00068-CW-L-95, 00074-CW-L-95 and 00090-CW-L-95 have changed their name from Western PCS Corporation to Western PCS II Corporation.			
File number 00021-CW-L-95 has changed its name from American Portable Telecommunications, Inc. to APT Minneapolis, Inc.			
File number 00022-CW-L-95 has changed its name from American Portable Telecommunications, Inc. to APT Tampa/Orlando, Inc.			
File number 00024-CW-L-95 has changed its name from American Portable Telecommunications, Inc. to APT Houston, Inc.			
File number 00065-CW-L-95 has changed its name from American Portable Telecommunications, Inc. to APT Kansas City, Inc.			
File number 00073-CW-L-95 has changed its name from American Portable Telecommunications, Inc. to APT Columbus, Inc.			
File number 00094-CW-L-95 has changed its name from American Portable Telecommunications, Inc. to APT Alaska, Inc.			
File number 00097-CW-L-95 has changed its name from American Portable Telecommunications, Inc. to APT Guam, Inc.			