

DESCRIPTION OF PROPOSED SERVICES AND PUBLIC INTEREST STATEMENT

Introduction

By this application, and pursuant to Part 5 of the Commission's rules, SkyTel Communications, Inc. ("SkyTel") requests grant of an Experimental Authorization to permit SkyTel to operate over a second 50 KHz 940 MHz channel in order to permit further testing and improvement of its Narrowband PCS service. The operations will be experimental in the truest sense in that the service will not be for hire and the goal of the tests will be to analyze the behavior of a frequency agile pager and/or messaging device. This request is necessitated only because SkyTel must use non-type accepted equipment.

SkyTel's Existing Operations

On July 13, 1994, SkyTel was granted a pioneer's preference authorization (Station KNKV 200) for 50 KHz of spectrum at 940.75-940.80 MHz.^{1/} On September 29, 1994, SkyTel, through its then subsidiary Destineer Corp., was granted two other Narrowband PCS authorizations by the Commission for Call Signs KNKV205 (File No. 28050-CN-P/L-94) and KNKV208 (File No. 28053-CN-P/L-94).^{2/} The frequency particulars associated with these authorizations are as follows:

Call Sign	Channel ID	Channel Bandwidth	Paired Channel Bandwidth
KNKV205	N-5	50 KHz (940.20-940.25 MHz)	50 KHz (901.20-901.25 MHz)
KNKV208	N-8	50 KHz (930.50-930.55 MHz)	12.5 KHz (901.7750-901.7875 MHz)

SkyTel is the only Narrowband PCS licensee providing advanced one-way and two-way messaging services on its network in any significant manner at this time. Indeed, SkyTel currently has over 350,000 customers on its advanced nationwide messaging network.

^{1/} SkyTel (then operating under the name Mobile Telecommunication Technologies, Inc., and through its subsidiary Destineer Corp.), paid to the federal government \$125,000,000.00 for this spectrum.

^{2/} Although other large messaging licensees advertise their offering of two-way and advanced messaging, in many instances they are merely reselling SkyTel service. With very limited exception, SkyTel is the only facilities based narrowband PCS provider.

SkyTel Proposed Testing

SkyTel, working in conjunction with two of its system vendors, Motorola, Inc. and Glenayre, Inc., to obtain a better understanding of how most efficiently to configure and operate a frequency agile pager which could switch from a large coverage area on frequency "X" to a smaller coverage area on frequency "Y". The use of frequency agile pagers is critical to the efficient build out of a second 940 MHz system in high usage pockets that are located in high usage systems while minimizing the number of second frequency transmitters necessary to absorb capacity demands. To illustrate, within the city limits of New York City there are certain areas of high usage that warrant operation of an additional frequency. The testing here at issue will facilitate SkyTel (and ultimately other carriers) being able to serve those areas efficiently and without needing to operate on a second frequency in other areas where demand does not call for it.

As SkyTel is currently experiencing very heavy usage on its existing system, SkyTel seeks to use on an experimental basis either of the two 50 KHz unpaired channels currently allocated on an MTA basis by Section 24.129(c)(3) of the Commission's rules. These frequencies are 940.90-940.95 MHz and 940.95-941.00 MHz. Neither is licensed to an entity, and the auction pursuant to which they will be licensed has not even been scheduled. SkyTel proposes to utilize these frequencies only in the vicinity in and around Jackson, Mississippi for a testing period to be the shorter of (a) 2 years, or (b) until any other entity is licensed and otherwise prepared to operate over the frequency at issue. The location of the base transmission site has not yet been determined as SkyTel is studying several different sites. However, each of the sites under consideration is located within a 20 mile radius of the city center of Jackson, Mississippi.

The paging equipment will be manufactured by one of SkyTel's vendors. SkyTel also requests a waiver of the station identification requirement found in the Commission's rules. The proposed particulars of technical operations are described below.

Frequency (MHz)	Class Stn	Emission Designator	Auth. Power (ERP)	Tolerance (+/-)	Modulating Signal	Trans- location
940.90	FX	50K0V2D	3.5 kW	0.005%	25.6 kb/s	

Public Interest Considerations

Grant of this application is in the public interest. It will allow SkyTel the necessary flexibility to conduct experiments for the continued efficient growth of its Narrowband PCS services. Specifically, the experiment at issue will permit SkyTel to most efficiently increase network capacity, where needed, and without the need to expend considerable monies expanding where such is not necessary. By allowing SkyTel to utilize non-type-accepted equipment, SkyTel will be able

to experiment with new solutions to engineering problems associated with the continuing build out of its nationwide system resulting in a faster deployment of enhanced services to the public.

Because neither of the requested frequencies is licensed, SkyTel will be the only entity operating on the frequency, thus assuring that the provision of service with the proposed operating parameters at these facilities will not cause interference or otherwise negatively affect the provision of any other telecommunications service. SkyTel will also make any required filings with the Federal Aviation Administration under the developmental authorization and ensure that any transmitters deployed under the developmental authorization will not constitute environmental actions necessitating an environmental impact statement under Section 1.1307 of the Commission's rules.

In view of the showings contained in this application, it is submitted that grant of this application would serve the public interest, convenience and necessity.