

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)
)
Petition on Behalf of the)
Louisiana Public Service)
Commission for Authority to)
Retain Existing Jurisdiction over)
Commercial Mobile Radio Services)
Offered Within the State of)
Louisiana)

PR Docket No. 94-107
PR File No. 94-SP5

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To: The Commission

REPLY COMMENTS OF McCaw Cellular Communications, Inc.

McCaw Cellular Communications, Inc. ("McCaw"),^{1/} by its attorneys, hereby submits its Reply Comments in connection with the above-captioned petition.

INTRODUCTION AND SUMMARY

In the Second Report and Order,^{2/} the Commission established a sound regulatory foundation for the continued growth and development of commercial mobile radio services ("CMRS"). The Commission correctly concluded in that proceeding that existing market conditions, together with enforcement of other provisions of Title II, render tariffing and rate regulation unnecessary to ensure that CMRS prices are just and nondiscriminatory or to protect consumers. The Commission found that imposing these

^{1/} On September 19, 1994, McCaw merged with AT&T Corp.

^{2/} In the Matter of Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services, Second Report and Order, 9 FCC Rcd 1411 (1994) ("Second Report and Order").

requirements on cellular and other CMRS providers would not serve the public interest, and that forbearance from unnecessary regulation of CMRS providers would enhance competition in the mobile services market.^{3/} Finally, the Commission ensured that like mobile radio services would be subject to consistent regulatory treatment.

In its initial comments on the various state petitions to extend the rate regulation of CMRS, McCaw argued that the basic framework established by Section 332(c) and the Second Report and Order required three separate showings in support of continued regulation. First, the petitioning state must show that market conditions unique to that state are substantially less competitive and substantially more likely to cause harm to consumers than the market conditions that have been found generally to support the Commission's decision to forbear from rate and tariff regulation. Second, since the Commission expressly relied upon the continuing availability of federal remedies under the Communications Act, a petitioning state must demonstrate that whatever unique competitive problems it has identified cannot be adequately addressed through these remedies. Third, in the unlikely event that a state can make the showings described above, it must also show that any marginal benefits of the proposed state regulation outweigh the substantial costs associated with regulation.

Two parties with a vested interest in maintaining disparate and burdensome regulation of cellular carriers, the National

^{3/} Id. at 1467.

Cellular Resellers Association ("NCRA") and Nextel Communications, Inc. ("Nextel") have filed generic comments in support of the above-captioned petitions to retain or impose regulation of CMRS providers. Their comments read as if the Second Report and Order was never adopted. On the basis of general and unsubstantiated assertions with respect to the state of competition in cellular markets, both parties would have the Commission sanction the regulatory disparities that the amendment of Section 332(c) was intended to redress. Neither NCRA nor Nextel presents a scintilla of evidence that might be considered by the Commission in determining whether any of the states have met their statutory and regulatory burden of proof to justify continued rate regulation of CMRS. As such, these comments are simply irrelevant to the detailed showings required in this proceeding.

Nextel also attempts to resurrect arguments that it has previously made, which attempt to justify regulation of cellular carriers based on their supposed "dominant" status. Both Congress and the Commission have rejected differences in regulatory treatment based on dominant/non-dominant distinctions. Rather, Section 332 sets forth a clear standard that must be met by a state seeking to regulate CMRS providers in general or cellular carriers in particular, and this standard is not met simply by trumpeting the fact that the Commission has never explicitly found cellular licensees to be non-dominant carriers.

Aside from these general comments, one party, Radiofone, filed comments in support of the Louisiana Public Service Commission's

("LPSC's") petition to retain state authority. Radiofone, Inc. (Radiofone") agrees with McCaw that the CMRS market is competitive. It nonetheless suggests that the LPSC should be permitted to retain jurisdiction to entertain rate complaints. Radiofone provides no objective evidence that market conditions require the exercise of such jurisdiction, and makes no effort to present evidence that federal remedies retained by the Commission are inadequate to address any residual competitive problems. Rather, Radiofone's proposal seems to be based exclusively on its past success in using the LPSC as a forum for airing its corporate grievances. Its arguments are irrelevant to the showing required under Section 332.

I. NEITHER NCRA AND NEXTEL HAVE NOT PROVIDED ANY EVIDENCE IN SUPPORT OF ANY OF THE STATE PETITIONS

The comments of NCRA and Nextel argue in the most general terms that competitive conditions in cellular markets are such that the states should be permitted to regulate cellular rates. The time for general arguments is over. The Second Report and Order sets forth a clear analysis of general competitive conditions in cellular markets, and, as McCaw pointed out in its various initial comments in response to the above-captioned petitions, the Commission concluded that these conditions do not warrant tariff, rate or entry regulation.^{4/} In order to overcome this fundamental

^{4/} See Opposition of McCaw Cellular Communications, Inc. to the Petition of the People of the State of California and the Public Utilities Commission of the State of California, to retain regulatory authority over intrastate cellular service rates, PR Docket No. 94-105, at 12-13 (filed Sept. 19, 1994) ("McCaw California Opposition").

conclusion, the states and their supporters must provide specific proof of market conditions different from the general competitive conditions described by the Commission, as well as proof that federal remedies are inadequate, and that the benefits of any proposed state regulation outweigh the costs.^{5/} Neither Nextel nor NCRA has provided one shred of evidence on any of these issues.

Predictably, Nextel puts the main weight of its arguments against state regulation of the services which Nextel provides. Since McCaw believes that no case has been made that any CMRS provider should be subjected to state regulation, McCaw does not disagree with Nextel's self-interested concern. Nextel goes wrong, however, in its attempt to suggest that regulation of cellular carriers by the states is justifiable. In support of this proposition, Nextel merely proffers a series of general statements that cellular carriers exercise market power, and briefly alludes to the "documented lack of competition and evidence of dominant providers in some states."^{6/} It offers no economic or other evidence whatsoever. This is not proof of market conditions requiring state regulation.

In support of its arguments, NCRA cites eight different "federal documents" which allegedly contain conclusions that cellular markets are not competitive. One of these documents, oddly, is the Commission's Second Report and Order, where the Commission found that "there is no record evidence that indicates

^{5/} See, id. at 12-16.

^{6/} Nextel Comments at 13.

a need for full scale regulation of cellular or any other CMRS offerings."^{7/} Moreover, as McCaw has noted in its initial comments, the Commission expressly concluded that forbearance from regulation of cellular carriers is appropriate, notwithstanding its concerns over the level of competition in cellular markets.

Of the seven other federal reports, many "analyze" cellular competitiveness only to the extent that they assume certain outcomes are likely based on the apparent dual-competitor -- or duopoly -- structure of the cellular industry.^{8/} The reports generally predate the passage of spectrum auction legislation and do not seriously consider the competitive impact of CMRS or PCS. More importantly perhaps, all but one of them predates the Second Report and Order. McCaw submits that the Commission's analysis in the Second Report and Order is dispositive, particularly in light of the Commission's extensive analysis of the economic evidence in the record before it.

In any case, these "federal documents" are of no value in considering whether any particular state has met its burden of proof in justifying current or prospective regulation of cellular markets. NCRA cites no state-specific findings in any of these

^{7/} Second Report and Order at 1478.

^{8/} McCaw has also submitted detailed economic critiques of the conclusions contained in two of the analyses cited by NCRA. See Declaration of Bruce M. Owen on the California Petition, submitted with the McCaw California Opposition, at 31 (critiquing conclusions in National Telecommunications and Information Administration, U.S. Spectre Management Policy: An Agenda for the Future (1991)); id. at 39 (critiquing Congressional Budget Office, Auctioning Radio Spectrum Licenses (March 1992)).

studies. Nor do any of these studies address the adequacy of federal remedies retained by the Commission, or the costs and benefits of particular regulatory responses. In short, these studies simply do not address the ultimate question before the Commission: the appropriateness of specific state regulations.

II. THE COMMISSION SHOULD REJECT NEXTEL'S SUGGESTION THAT STATE REGULATION OF "DOMINANT" CARRIERS IS JUSTIFIED

Perhaps recognizing the weakness of its economic showing, Nextel also suggests that state regulation of cellular can be justified on the basis of cellular's "dominant" status.^{9/} Having rejected this argument in determining to forbear from federal regulation of CMRS, the Commission should likewise dismiss it in this context.

As Nextel is surely aware, neither Congress nor the FCC found the dominant/non-dominant distinction to be relevant in regulating CMRS. Section 332(c) does not require the Commission first to classify a commercial mobile service provider as "non-dominant" to justify forbearance. Congress was well aware of the dominant/non-dominant distinction when it enacted Section 332(c).^{10/} Nonetheless, when House-Senate conferees added the requirement that the Commission evaluate market conditions before it decided to

^{9/} Nextel Comments at 11-14.

^{10/} See, e.g., House Report at 260-61 (stating that the Committee was "aware" of the court decision voiding the "Commission's long-standing policy of permissive detariffing, applied to non-dominant carriers").

forbear,^{11/} they did not limit forbearance to carriers that had been declared "non-dominant." Rather, they required only that the Commission determine that forbearance will "promote competition among providers of commercial mobile services."^{12/} In the Second Report and Order, the Commission determined that cellular providers "face sufficient competition" to justify the relaxation of certain rules traditionally applied in non-competitive markets.^{13/}

The Commission's refusal to apply different regulation to cellular carriers is sound, and should apply equally to the pending state petitions. Distinctions between "dominant" and "non-dominant" providers are rooted in the wired marketplace, where entrenched monopolies control a dominant share of all potential customers in the market. Such distinctions are not applicable to the wireless industry, where nascent providers have single digit shares of potential customers. Landline local exchange carriers, for example, still command virtually 100 percent of exchange service in their regions with penetration levels of approximately 94 percent, and are rightly tagged with the "dominant" label. In contrast, McCaw, the country's largest cellular carrier, has never

^{11/} See 47 U.S.C. § 332(c)(1)(C).

^{12/} 47 U.S.C. § 332(c)(1)(C); see also Conference Report at 491.

^{13/} Second Report and Order at 1470 (citing Cellular CPE Bundling Order, 7 FCC Rcd at 4028-29). See also Policy and Rules Concerning Rates for Competitive Common Carrier Services and Facilities Authorizations Therefor (Fifth Report and Order), 98 FCC 2d 1191, 1204, n.41 (1984) (emphasizing that cellular carriers' "ability to engage in anticompetitive conduct or cost-shifting appears limited").

served more than five percent of the potential subscribers on average in any of its cellular markets.

In a further attempt to preserve existing regulatory advantages, Nextel also suggests that states should be permitted to impose additional regulations upon "established" mobile service providers.^{14/} Such a distinction would serve no useful purpose because no CMRS provider, "established" or otherwise, possesses market power or controls bottleneck facilities. Given the emerging nationwide competition among providers of wireless services, including Nextel, there is no need to handicap the market in favor of "new" entrants. In this regard, it is worth noting that Congress specifically considered and rejected a proposal to authorize the imposition of disparate regulatory requirements on existing providers and "new [market] entrants."^{15/} Likewise, in the Second Report and Order, the Commission itself considered and rejected the suggestion of Nextel and others to impose differential regulation based on a carrier's alleged market power.^{16/}

In light of the clear rejection of Nextel's proposed distinctions at the federal level, the Commission must also reject such distinctions in evaluating state regulation. The Commission has determined that dissimilar regulation of mobile service providers is inconsistent with the growth and nationwide

^{14/} See Nextel Comments at 12-13, 14-15.

^{15/} See Conference Report at 490-91.

^{16/} Second Report and Order at 1473-1474.

development of a competitive market for commercial mobile services.^{17/} The states should not be permitted to establish such dissimilar regulation under color of Section 332(c)(3). Such a result would effectively substitute a patchwork of state-imposed regulatory classifications of CMRS providers for the uniform federal CMRS regulatory framework adopted by Congress, thereby undermining fair competition and the growth and development of commercial mobile services.

III. RADIOFONE HAS NOT PROVIDED ANY SUPPORT FOR THE LOUISIANA PUBLIC SERVICE COMMISSION'S REGULATORY REGIME

Only one party has specifically supported any of the three state petitions which are the subject of these Reply Comments. Radiofone, a provider of paging and cellular services in Louisiana, opposes the proposal of the LPSC to impose rate of return regulation, but nonetheless supports giving the LPSC broad authority to entertain complaints with respect to cellular rates and the provision of cellular service. Radiofone's continued interest in rate regulation by the LPSC does not stem from a belief that market conditions in Louisiana are insufficient to protect consumers, but rather from a fear that without LPSC intervention, Radiofone will be subjected to unfair or discriminatory treatment by other carriers whose services it requires for roaming or for interconnection to the public switched network. Apparently, the

^{17/} Id. at 1420.

LPSC has been useful in helping the company resolve its disputes with competitors.

Radiofone's argument lends no support to the LPSC's petition, which must be evaluated under the test set forth in Section 332(c). The fact that LPSC may have proved to be a useful forum for Radiofone to pursue intercorporate battles with its competitors and connecting carriers does not establish that rate regulation by the LPSC is critical for the protection of consumers, as opposed to Radiofone itself, or that the Commission could not itself effectively resolve whatever carrier complaints Radiofone may have in the future.

In its initial comments on the LPSC petition, McCaw demonstrated that CMRS markets in Louisiana are competitive^{18/} and that the LPSC's petition provided no evidence which undermines this conclusion.^{19/} McCaw also demonstrated that federal remedies retained by the Commission were adequate to address any residual competitive concerns raised by the LPSC, and that the LPSC had not demonstrated that the residual benefits of state regulation outweigh the substantial costs associated with such regulation.^{20/} Significantly, Radiofone agrees with McCaw on the central issue

^{18/} Opposition of McCaw Cellular Communications, Inc. to Petition on Behalf of the Louisiana Public Service Commission for Authority to Retain Existing Jurisdiction Over Commercial Mobile Radio Services Offered Within the State of Louisiana at 20-23 (filed Sept. 19, 1994) ("McCaw Louisiana Opposition").

^{19/} Id. at 24-29.

^{20/} Id. 29-33.

before the Commission: that Louisiana CMRS markets are competitive^{21/} and that "there is no need to employ rate of return regulation as a surrogate for competition."^{22/}

Having recognized that the CMRS marketplace is competitive, Radiofone fatally undermines its case for rate regulation. Radiofone nonetheless argues that retention of authority by the LPSC is necessary to address "market anomalies."^{23/} The short answer to this contention is that competition, not government regulation, will address these anomalies. In any case, Radiofone has not proven the existence of the anomalies, other than to recite Radiofone's grievances at certain carrier practices. These grievances are not evidence.

Radiofone also loses sight of the fact that the sole issue before the Commission is whether LPSC can retain jurisdiction over CMRS rates. As McCaw pointed out in its comments, the LPSC can, without filing a petition, retain regulatory authority over intrastate local exchange carrier interconnection rates and other terms and conditions of cellular service, including consumer protection matters.^{24/} Radiofone provides no evidence for concluding that market conditions fail to ensure that CMRS rates remain just, reasonable, and not unreasonably discriminatory.

^{21/} Comments of Radiofone, Inc., PR Docket No. 94-107 at 6 (filed Sept. 19, 1994) (emphasis added) ("Radiofone Comments").

^{22/} Id. at 7 (citations omitted).

^{23/} Radiofone Comments at 3.

^{24/} McCaw Louisiana Opposition at 27.

Even if one accepted Radiofone's allegations of "anomalies," Radiofone would still not have justified state regulation. A petitioning state bears the burden of proving that the federal remedies retained by the Commission are inadequate to address residual competitive problems.^{25/} Radiofone's unsupported assertion that the LPSC responds "more quickly on a local basis" is not sufficient to provide such proof.

Finally, Radiofone has failed to establish that the benefits of permitting the LPSC to retain jurisdiction over complaints with respect to rate matters outweigh the substantial costs the Commission found to be associated with such regulation. In fact, what Radiofone proposes appears to be the worst of all possible worlds. Radiofone would have the LPSC regulate CMRS rates through sporadic ad hoc decisionmaking in response to customer and carrier complaints. In fact, even Radiofone expresses reservations with the LPSC's analysis of rate matters^{26/} as well as its handling of several complaints involving Radiofone.^{27/} Whatever favorable experiences Radiofone might have otherwise had with the LPSC, McCaw submits that such ad hoc decisionmaking is the antithesis of the "stable, predictable regulatory environment" which the Commission sought to foster in the Second Report and Order.^{28/}

^{25/} Id. at 13-14, 29-30.

^{26/} Radiofone Comments at 4-5.

^{27/} Id. 6 n.16. Perhaps Radiofone is suggesting that its proposed regulatory regime should apply to all carriers except itself.

^{28/} Second Report and Order at 1421.

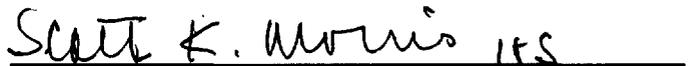
In short, Radiofone's case for state regulation boils down to Radiofone's desire to preserve the LPSC as a forum to which Radiofone can bring its business disputes with other CMRS providers. Its arguments are irrelevant to the showing required under Section 332. Radiofone's suggestion that the LPSC retain jurisdiction over complaints with respect to CMRS rates should be rejected.

CONCLUSION

None of the commenting parties supporting the state petitions provide any additional evidence upon which the Commission could find that the standard set forth in Section 332 has been met. For the reasons set forth above and in McCaw's initial comments, the above-captioned petitions should be denied.

Respectfully submitted,

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October 14, 1994

Certificate of Service

I, Kecia Boney, do hereby certify that a copy of the foregoing Reply Comments of McCaw Cellular Communications, Inc. was served on the following by hand delivery or first-class mail, postage prepaid, this 14th day of October, 1994.


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