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February 14, 1995

EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: CC Docket No. 94-54; Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Service

Dear Mr. Caton:

On Monday, February 13, 1995, Jeff Chessher and I, on behalf of AirTouch Communications, met with Barbara Esbin and Judy Argentieri of the Wireless Bureau, Greg Rosston of the Office of Plans and Policy, and Kalpak Gude of the Common Carrier Bureau. We discussed the information in the attached material. Please associate this material with the above-referenced proceeding.

Two copies of this notice were submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me at 202-293-4960 should you have any questions or require additional information concerning this matter.

Sincerely,

Kathleen Q. Abernathy

Attachment

cc: Judy Argentieri
Barbara Esbin
Kalpak Gude
Greg Rosston

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Presentation to Federal Communications Commission

February 13, 1995

AirTouch Communications

Wireless to Wireless Interconnection

- Wireless to wireless interconnection can and is happening today.
 - Direct connection agreements are negotiated between cellular carriers where enough traffic is exchanged to cover costs of additional trunk groups.
 - No technical barriers exist as these are ordinary trunk groups designed by standards.
 - Agreements around the country will vary as market environments differ.
 - Considerations include assumption of risk for fraud, bad debt, billing errors and network failures.

Wireless to wireless interconnection (cont.)

- Industry and technology changing rapidly; Markets need flexibility to respond quickly to competitive and technology changes.
- Mandatory interconnection can create uneconomic results.
 - Inefficient utilization of facilities and investment.
 - Delays in the introduction of new technology.
- Bottom line is that wireless to wireless interconnection can and is happening today and is based on negotiated agreements. Further regulation is unnecessary.

PCS interconnection to existing wireless

- PCS licensees have same opportunities and abilities to negotiate direct interconnection to cellular.
 - All CMRS networks will interconnect through PSTN, the hub through which all callers have access.
 - As traffic exchanged between any two (or more) wireless networks builds to a given level, it will be in the best interest of the carriers to directly interconnect. The decision will be based on least cost routing concepts.
 - Absent a significant exchange of traffic, direct connection between wireless networks provides no value to either carrier.
 - In time, as wireless penetration increases bypass of LEC interconnection will become business as usual.

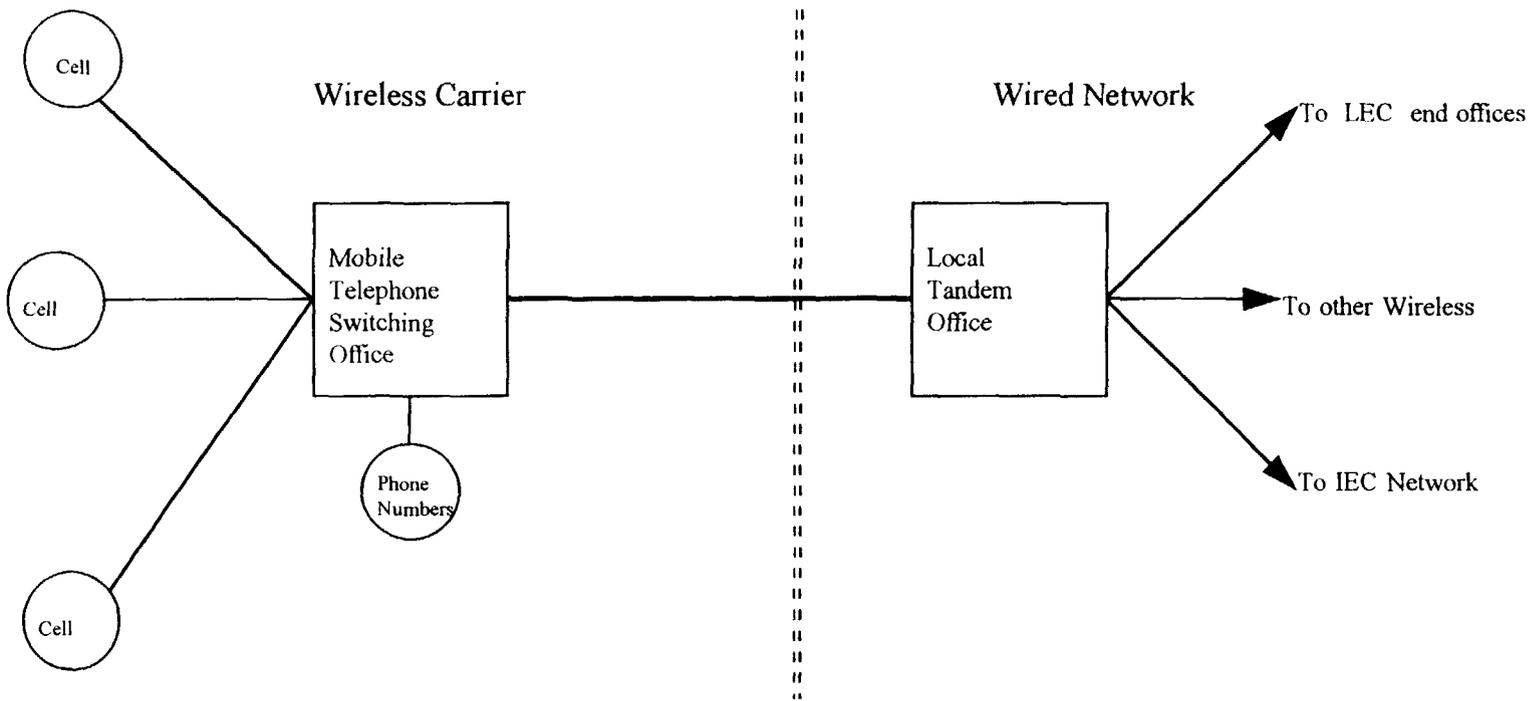
Non-facilities based resellers should not have interconnection rights

- Reseller switch concept provides duplicate and inefficient network elements.
 - Proposed efficiencies based on receiving “cost-based” elements (unbundling), inconsistent with competitive market driven concepts.
 - Unbundling of facilities based carriers networks destroy economies, creates additional costs and causes regulatory uncertainties.
 - Additional costs include software upgrades, increased processing of call validation functions, additional maintenance and forecasting, new data circuits and protocol converters.
 - No “savings” result from direct reseller interconnection to LEC these costs simply shift from cellular carriers to resellers.

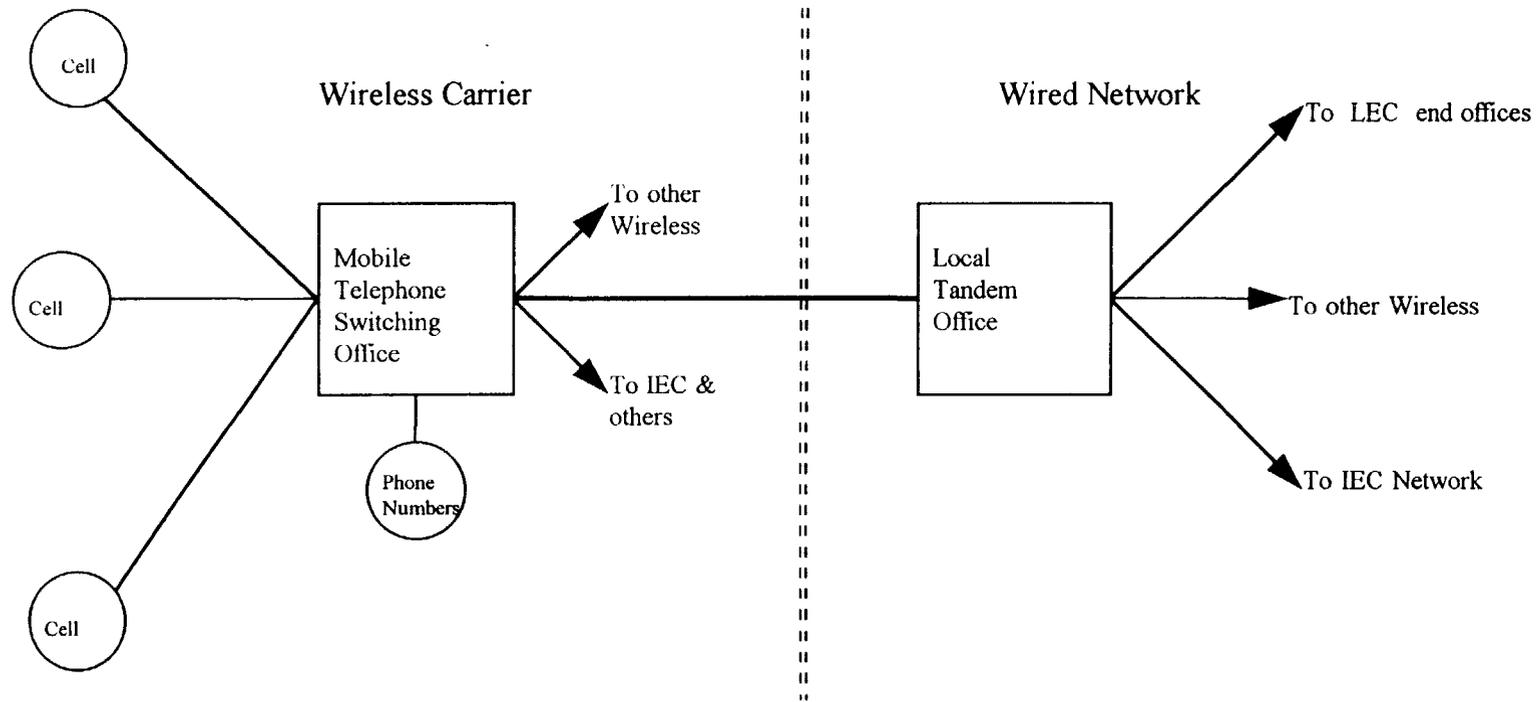
Non-facilities based resellers should not have interconnection rights (cont.)

- Reseller switch proposals lack technical specificity.
 - Interfaces must be standardized
 - Proposals must include reasonably accurate forecasts of demand.
 - Proposals must be well engineered and complete.
- Resellers will not be able to provide any features that the facility based carries cannot.
 - SS7 capabilities will enable facility based carries to offer all (and more) services proposed by resellers.
- Reseller switch can degrade service in the facilities based carriers system.
 - Unpredictable shifts in demand causing blockage.
 - Reduces voice quality; Less efficient use of network resources.

Traditional Wireless Network Connection to Local Network

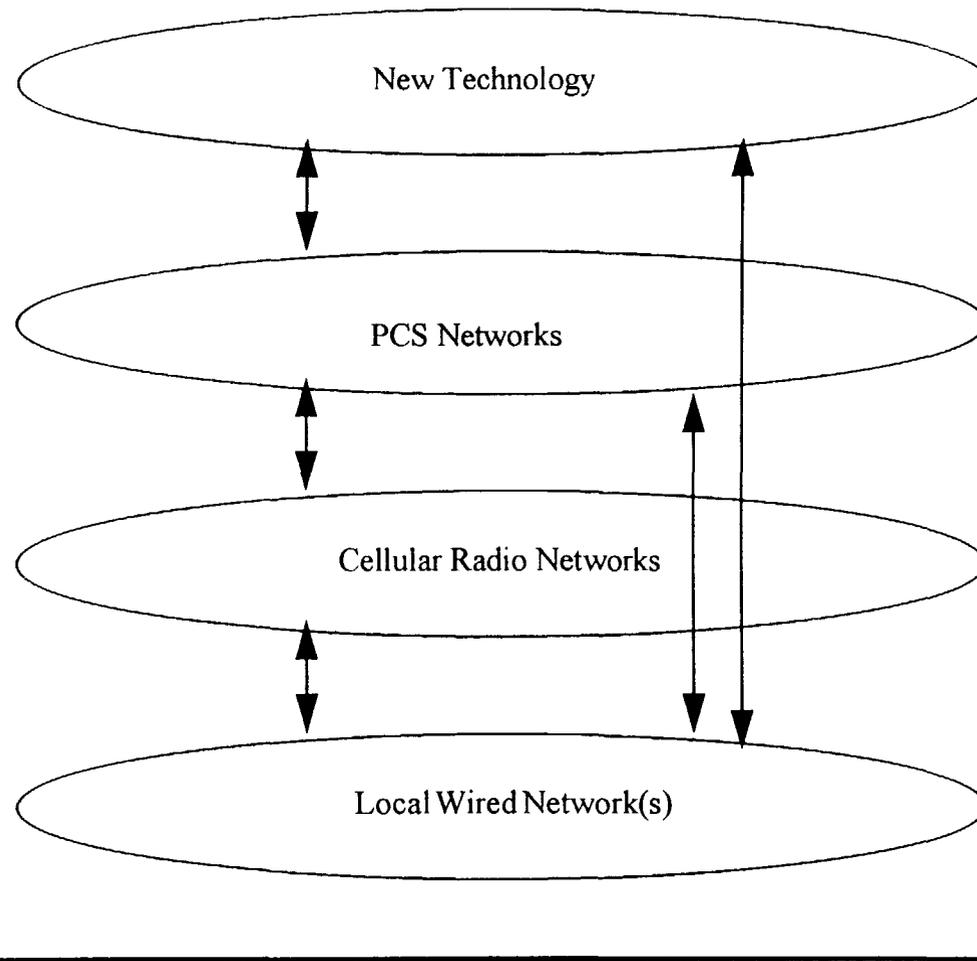


Wireless Network Connections To Any Demand Source



Layered Networks

Ubiquitous Interconnection



Reseller Switch Connection To Network

