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July 14, 1995

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DOCKET FILE COPY ORIGINAL

Subject: Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services, CC Docket No. 94-54.

Dear Mr. Caton:

Enclosed please find the original and nine copies of the General Services Administration's Reply Comments for filing in the above-referenced proceeding. Copies of this filing have been served on all interested parties.

Sincerely,

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Enclosures

cc: International Transcription Service

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BEFORE THE
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WASHINGTON, D.C. 20554

In the Matter of Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services	CC Docket No. 94–54

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REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

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REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

SUMMARY

In these Reply Comments, GSA responds to the comments filed by parties addressing issues of interconnection and resale of Commercial Mobile Radio Services ("CMRS"). GSA rebuts the positions of parties who assert that interconnection and resale of these services is not required and that the requirements for resale to facilities–based carriers should sunset after they are established in the market.

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REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

I. INTRODUCTION

The General Services Administration ("GSA") submits these Reply Comments on behalf of the Federal Executive Agencies in response to the Commission's Second Notice of Proposed Rulemaking ("NPRM"), FCC 95–149, released April 20, 1995. In that Notice, the Commission requested comments and replies on the interconnection and resale obligations for Commercial Mobile Radio Services ("CMRS").

On June 14, 1995, GSA submitted Comments in this proceeding addressing several of the Commission's conclusions described in the NPRM. Specifically, GSA urged the Commission to adopt interconnection requirements for CMRS that mirror those employed for wireline services. Also, GSA recommended that the Commission adopt regulations requiring resale of CMRS and that such requirements continue without prescribed "sunset" provisions for resale of CMRS to facilities–based carriers.

In addition to Comments filed by GSA, approximately 50 other participants submitted comments concerning the Commission's findings contained in the NPRM:

- 18 firms providing cellular services, including affiliates of Regional Bell Holding Companies with cellular licenses,
- 6 associations of cellular voice or other mobile service providers,
- 7 cellular resellers,
- 2 associations of cellular resellers,
- 2 Personal Communications Service ("PCS") licensees,
- 4 Special Mobile Radio ("SMR") providers,
- a firm providing in–flight telephone services,
- a company providing marine radio telephone services,
- 2 firms providing paging services,
- 4 interexchange carriers, and
- an association of firms in the information technology field.

The comments by these parties expressed a wide range of opinions concerning the proposed rules.

Among the commentors, however, GSA was the only party responding from the prospective of an end user. Nearly every other party had some direct connection with a specific product line or service category. These parties have divergent views on some of the issues concerning CMRS interconnection and resale. From its unique vantage point, GSA remains convinced that the position set forth in its June 14 Comments will provide the best foundation for development of competition in the telecommunications industry.

II. CMRS–TO–CMRS INTERCONNECTION SHOULD BE REQUIRED.

In its NPRM, the Commission expressed its tentative conclusion that a requirement for direct CMRS–to–CMRS interconnection was not appropriate at the

present time. The Commission described a wide range of benefits from CMRS interconnection, including enhanced access to all networks, network redundancy, greater flexibility in communications, and better services for consumers.[1] However, the Commission stopped short of requiring all CMRS providers to interconnect, indicating that it would prefer to allow parties to negotiate interconnection agreements independently. The Commission said that it would take action on complaints of anti–competitive conduct from firms whose reasonable requests for interconnection were denied, and would consider factors such as the market power and the corporate affiliation of "denying" firms before deciding whether it should impose specific interconnection obligations in each case.[2]

In its June 14 Comments, GSA strongly urged the Commission to adopt rules requiring direct CMRS–to–CMRS interconnections. As GSA explained, widespread interconnection will accelerate the growth of diverse and competitive mobile services, and provide more opportunities for the Federal Government and other users to obtain telecommunications services through an active competitive bidding process.[3]

Very few parties supported interconnection requirements in their initial comments in response to the NPRM. American Personal Communications and the National Wireless Resellers Association were among the few parties in addition to GSA to broadly support CMRS–to–CMRS interconnection. The cellular carriers, the cellular associations, and even the interexchange carriers, assert that mandatory mobile system interconnection is not necessary at the present time.

Parties opposing mandatory interconnection advanced some common arguments. First, they argued that the industry is still in an early stage of development

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1 NPRM, page 16.

2 *Id.*

3 Comments of GSA, page 3.

and changing too rapidly to formulate and apply reasonable interconnection standards.[4] Second, they suggested that the CMRS markets are characterized by a great deal of competition. Since no firm exerts enough market power to take a leadership position in each market, it is not necessary to require all firms to interconnect.[5] Finally, even if there were such a "leader," firms providing wireless services are now required to interconnect with landline carriers (and vice versa), so that the effect of CMRS–to–CMRS interconnection can be achieved by using a Local Exchange Carrier ("LEC") as a link.[6]

GSA submits that these arguments lack merit. In almost all metropolitan areas, the "cellular market" has probably matured to the point where neither of the two licensed firms has a significant advantage caused by an earlier start or by "exogenous factors." Conversely, the new PCS licensees will be competing head–to–head with the well–established duopolists, and mandatory interconnection may be helpful to provide the newer companies with a more equal opportunity to compete.

In addition, interconnection through a LEC may frequently be inferior. As American Personal Communications ("APC") notes, use of the LEC network as a connecting "hub" may have serious impacts on the ability of the new PCS licensees to compete.[7] APC explains that transactions involving a total of three firms (two CMRS providers and the LEC) are likely to result in arrangements that are artificially more

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4 *See, e.g.*, Comments of Ameritech, page 2; Comments of BellSouth, page 2; and Comments of Bell Atlantic Mobile Systems, page 5.

5 *See, e.g.*, Comments of GTE, pages 5–6; and Comments of AT&T Corp., pages 14–15.

6 *See, e.g.*, Comments of Personal Communications Industry Association, page 5; and Comments of Nextel, page 3.

7 Comments of American Personal Communications, pages 2–3.

expensive for the new entrant, resulting in decreased competition and higher prices for consumers.[8]

GSA agrees with APC that "[i]nterconnection is fundamental to promoting a seamless national network,"[9] and GSA strongly urges the Commission to require interconnection as an additional step to help ensure viable competition for all telecommunications services.

III. THE COMMISSION SHOULD REQUIRE RESALE OF CMRS DESPITE REQUESTS BY PARTIES WITH LIMITED INTERESTS.

In its NPRM, the Commission expressed a tentative conclusion that resale of CMRS will serve the public interest.[10] GSA concurred with this conclusion in its Comments, and remains convinced that resale will promote competition among all telecommunications firms and contribute to the strength of all telecommunications markets.[11]

On balance, parties supported requirements for resale of CMRS. Bell Atlantic Mobile Systems expressed the position shared by other parties that the advantages of resale apply equally to all wireless carriers so that all CMRS providers should be required to resell their services.[12] With few exceptions, LECs and interexchange carriers also supported resale.

Opposition to resale requirements is generally confined to a distinct part of the total wireless market. For example, GTE Service Corporation ("GTE") generally supported resale requirements, but asserted that they should not apply to air–to–

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8 *Id.*, page 3.

9 *Id.*, page 1.

10 NPRM, page 49.

11 Comments of GSA, pages 6–7.

12 Comments of Bell Atlantic Mobile Systems, Inc., page 10.

ground service providers because technical issues prevent resale in this context and healthy competition already exists among firms to provide this service.[13] The Personal Communications Industry Association ("PCIA") asserted that there is no public interest rationale for imposing affirmative resale obligations on paging and narrowband PCS licensees.[14]

One of the few broad attacks on CMRS resale came from Nextel. In its comments, Nextel states that the Commission only mandated resale obligations in the past because of the presence of a bottleneck provider in the market or because of the need to eradicate the advantages of one of the duopoly licensees in the cellular market. Nextel claims that there is no need to continue this pattern for any of the PCS licensees, since none of them now have the advantage of a "headstart." Nextel also claims that resale reduces an existing CMRS carrier's ability to recover its investment, because other firms can be licensed simply to resell someone else's capacity without making any investment of their own.[15] This is particularly harmful to new providers in the implementation stage, claims Nextel, because the new providers must maintain control of their systems, especially when customers are migrating from analog services to wide–area digital systems.[16] Finally, resale raises technological and "proprietary" concerns for Nextel because their services are "unique" and therefore require customer education as well as training by the company's own personnel.[17]

GSA urges the Commission to require resale of all CMRS in spite of these assertions. Although more licensees will be providing wireless services of some type,

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13 Comments of GTE, pages 16–21.

14 Comments of PCIA, pages 10–15.

15 *Id.*, page 11.

16 *Id.*, page 13.

17 *Id.*, page 14.

it is likely that a small number of firms will continue to dominate almost every local market for some period of time. Even if it is not necessary to compensate for the leading position of other firms, resale is beneficial because resellers add value to telecommunications services. For example, a reseller may provide a customized billing service, or bundle mobile radio service with other services provided by wireline carriers. As GSA has indicated, resale should increase the overall demand for CMRS and increase overall traffic on telecommunications networks, permitting greater economies of scope and scale which ultimately benefit users and telecommunications firms alike.[18]

Nextel's claim that resale obligations reduce the opportunities for a CMRS carrier to recover its investment in plant, or the costs of specialized systems, education or training programs, also should not be used as a basis for not establishing resale requirements. Facilities–based carriers acquiring capacity from other firms are expected to compensate the firms providing plant. Rates and charges should be established so that the revenues obtained by providing facilities to these firms cover investment costs, operating and maintenance expenses, and any unique costs associated with "sale" of the capacity. Therefore, Nextel would be free to recover specialized education and training costs, as well as a reasonable return on any investment associated with the transaction.

Ameritech is correct in its observation that there are "no general, technical or economic issues which would preclude applying the resale requirement to all CMRS providers."[19] Ameritech notes that the objections to resale are largely "self–interested pleas" for special treatment.[20] GSA agrees with Ameritech and other parties that the

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18 Comments of GSA, page 6.

19 Comments of Ameritech, page 6.

20 *Id.*

Commission should ignore these pleas and adopt uniform requirements for resale for all CMRS at this time.

IV REQUIREMENTS TO RESELL CAPACITY TO FACILITIES–BASED CARRIERS SHOULD NOT SUNSET.

In its NPRM, the Commission tentatively concluded that the requirement for CMRS firms to continue to provide resale capacity to a facilities–based competitor should not continue indefinitely after the competitor has become established in the market.[21] This conclusion rests on the proposition that after a facilities–based carrier has been operating for some time, it is less important to recognize the advantages of older firms with more established positions providing the same or similar services. Indeed, continuation of resale requirements could conceivably chill development of competition, because newer firms could rely on the availability of facilities from other companies rather than building their own networks.

All parties except GSA that express a position on this issue agreed with the Commission's tentative conclusion. While most parties recognize the value of resale requirements at the offset, they asserted that a continuation of resale requirements would become counter–productive at some point in time.

The comments by NYNEX generally reflected the views of local exchange carriers, interexchange carriers, and other parties on this matter. NYNEX asserted that a policy that requires resale during the build–out period for PCS licensees would be beneficial because it would promote competition between CMRS providers.[22] However, the requirement for resale should not continue beyond the end of that period

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21 NPRM, page 49.

22 Comments of NYNEX, page 8.

because it "would tend to have the unintended consequence of minimizing any incentive a reseller would have to build its own network."[23]

The views of PCIA are similar to those expressed by NYNEX. PCIA maintained that a fully operational facilities–based carrier should not have "mandatory access to a competitor's capacity."[24] PCIA claimed that while a resale requirement initially encourages competition and consumer choice, it ultimately has the opposite effect because it "discourages construction of CMRS infrastructure."[25]

GSA agrees with the Commission that at some point it may no longer be necessary to compensate for the advantages that other firms may have in providing wireless services. However, GSA strongly disagrees that resale requirements should be removed when it is no longer necessary to recognize the "headstart."

As GSA pointed out in its June 14 Comments, resale capacity can be employed to synthesize new services and provide additional competitive options regardless of the relative size of the companies or the length of their active participation in the telecommunications markets.[26] A firm's ability to obtain supplemental facilities from other carriers to augment its own network may enable it to offer more services or different types of services to more consumers.

Even if a facilities–based carrier has been established in a geographical area for some period of time, population densities or other factors may make duplication of facilities economically inefficient in portions of that area. As a practical matter, even carriers with significant networks may require facilities from other firms for them to operate and provide more options for consumers in these places.

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23 *Id.*

24 Comments of PCIA, page 21.

25 *Id.*

26 Comments of GSA, page 8.

GSA urges the Commission to adopt policies that will promote the maximum number of alternatives for consumers. Predetermined sunset conditions will not meet this goal.

V. CONCLUSION

As the agency vested with the responsibility for acquiring telecommunications services on a competitive basis for use of the Federal Executive Agencies, GSA urges the Commission to establish interconnection requirements for CMRS that mirror those existing for wireline services, require resale of all CMRS, and continue obligations for resale to facilities–based carriers even after these carriers are established in the market.

Respectfully submitted,

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July 14, 1995

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