

DOCKET FILE COPY ORIGINAL

EX PARTE OR LATE FILED



Building The  
Wireless Future™

July 2, 1996

CTIA

Cellular  
Telecommunications  
Industry Association  
1250 Connecticut  
Avenue, N.W.  
Suite 200  
Washington, D.C. 20036  
202-785-0081 Telephone  
202-785-0721 Fax

RECEIVED

JUL 2 1996

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: **Ex Parte Presentation**  
**CC Docket No. 95-185 (Interconnection Between Local**  
**Exchange Carriers and Commercial Mobile Radio**  
**Service Providers) and CC Docket No. 96-98** ✓  
**(Implementation of the Local Competition Provisions in**  
**the Telecommunications Act of 1996)**

Dear Mr. Caton:

On Tuesday, July 2, 1996, the original of the attached letter and related summaries of interconnection agreements, were delivered to Michele Farquhar, Chief, Wireless Telecommunications Bureau. On the same day, copies of the information were delivered to FCC Chairman Reed E. Hundt, Commissioner James H. Quello, Commissioner Susan Ness, Commissioner Rachelle B. Chong and the Commission employees listed below:

Rosalind Allen  
Lauren Belvin  
James Casserly  
James Coltharp  
David Furth  
Daniel Grosh  
William Kennard  
Kathleen Levitz  
Elliot Maxwell  
Ruth Milkman  
Dan Phythyon  
David Solomon  
Suzanne Toller  
Stanley Wiggins

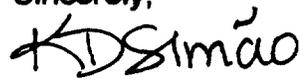
Laurence Atlas  
Nancy Boocker  
Jackie Chorney  
David Ellen  
Donald Gips  
Michael Hamra  
Linda Kinney  
Jane Mago  
Pamela Megna  
John Nakahata  
Gregory Rosston  
D'Wana Speight  
Michael Wack  
Christopher Wright

Rudolfo Baca  
Karen Brinkmann  
John Cimko  
Joseph Farrell  
Pamela Greer  
Regina Keeney  
Blair Levin  
Jay Markley  
Richard Metzger  
Robert Pepper  
David Siddall  
Peter Tenhula  
Jennifer Warren

No. of Copies rec'd  
List ABOVE

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and the attachment are being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "KDSimao". The letters are stylized and connected.

Karen Denise Simao

Attachment

EX-104 12:00 PM LATE FILED



*Building The  
Wireless Future..*

## CTIA

Cellular  
Telecommunications  
Industry Association  
1250 Connecticut  
Avenue, N.W.  
Suite 200  
Washington, D.C. 20036  
202-785-0081 Telephone  
202-785-8203 Fax  
202-736-3256 Direct Dial

**Randall S. Coleman**  
Vice President for  
Regulatory Policy and Law

July 2, 1996

RECEIVED

JUL 2 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Ms. Michele Farquhar  
Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, NW, Room 5002  
Washington, DC 20554

**Re: CC Docket No. 95-185 (Interconnection Between Local  
Exchange Carriers and Commercial Mobile Radio  
Service Providers) and CC Docket No. 96-98  
(Implementation of the Local Competition Provisions in  
the Telecommunications Act of 1996)**

Dear Michele:

Per your request, I have attached two CTIA documents which summarize recently concluded interconnection agreements and the current or proposed state policies with respect to such agreements. With one exception, the agreement between Ameritech and Southwestern Bell Mobile Systems, the summarized interconnection agreements are between local exchange carriers (LECs) and competitive LECs (or CLECs).<sup>1</sup> The one-page document lists the states and their current or proposed approach to interconnection. The three-page document provides another perspective on the same information, summarizing the terms of specific LEC interconnection agreements. The attached information shows that:

1. Some states have sanctioned "bill and keep;"
2. Other states have proposed "bill and keep;"
3. Some states have approved or proposed "reciprocal compensation;"
4. Some states have not reviewed interconnection agreements; and
5. The listed interconnection rates are all substantially lower than previous rates.

---

<sup>1</sup> The one LEC-CMRS agreement (between Ameritech and Southwestern Bell Mobile Systems) that has been reviewed by state authorities was discussed in the June 7, 1996 letter of Thomas E. Wheeler, CTIA, to Chairman Hundt, FCC.



Significant variation exists among the states which have addressed interconnection, and so far only one state has addressed interconnection between a LEC and a wireless carrier. In fact, Connecticut and New York have advised CMRS carriers that they must submit themselves to state authority over CMRS pricing and entry as a *quid pro quo* for receiving interconnection rates equal to those granted to CLECs.

Because of the multistate character of wireless service areas, by design in the case of PCS and in response to consumer needs in the case of cellular, a uniform, national policy with respect to LEC-CMRS interconnection is needed. To surrender this important matter to state authority will only invite state interest in regulating CMRS rates and entry and result in conflicting state policies which will impede the ability of wireless carriers to compete with the local telephone monopoly.

Please contact me if you have any questions regarding the attached information.

Sincerely,

Randall S. Coleman

**Attachments**

**STATES CURRENTLY SANCTIONING "BILL AND KEEP"**

OREGON

CALIFORNIA

MICHIGAN

**STATES PROPOSING "BILL AND KEEP"**

WYOMING

ARIZONA

COLORADO

OHIO

OREGON

VIRGINIA

TEXAS

WASHINGTON

**STATES CURRENTLY SANCTIONING  
RECIPROCAL COMPENSATION**

MARYLAND

CALIFORNIA

OHIO

VIRGINIA

KENTUCKY

TENNESSEE

MISSISSIPPI

LOUISIANA

ALABAMA

GEORGIA

NORTH CAROLINA

SOUTH CAROLINA

FLORIDA

ILLINOIS

**STATES PROPOSING RECIPROCAL COMPENSATION**

OKLAHOMA

## Interconnection Agreements

Local Exchange Carrier(LEC)	Commercial Mobile Radio Service(CMRS) Provider	Terms	States Covered	Rate (per minute)
Ameritech	Southwestern Bell Mobile Systems dba Cellular One	<ul style="list-style-type: none"> <li>Reciprocal Compensation</li> </ul>	<ul style="list-style-type: none"> <li>Illinois</li> </ul>	0.5¢ after a 3 year transition, but rate is available immediately for CLEC's.

Local Exchange Carrier(LEC)	Competitive Local Exchange Carrier(CLEC)	Terms	States Covered	Rate (per minute)
U S WEST	Electric Lightwave Inc. (ELI)	<ul style="list-style-type: none"> <li>"Bill and Keep" for 24 months per Oregon PUC decision</li> </ul>	<ul style="list-style-type: none"> <li>Oregon (Portland)</li> </ul>	"Bill and Keep"
Pacific Bell	ICG Access Services, Inc.	<ul style="list-style-type: none"> <li>"Bill and Keep" per California PUC decision</li> </ul>	<ul style="list-style-type: none"> <li>California</li> </ul>	"Bill and Keep"
GTE	Teleport Communications Group, Inc. (TCG)	<ul style="list-style-type: none"> <li>"Bill and Keep" per California PUC decision</li> </ul>	<ul style="list-style-type: none"> <li>California</li> </ul>	"Bill and Keep"
Ameritech	City Signal, Inc.	<ul style="list-style-type: none"> <li>"Bill and Keep" unless there is a traffic imbalance greater than 5% per Michigan PSC decision</li> </ul>	<ul style="list-style-type: none"> <li>Michigan</li> </ul>	"Bill and Keep"

Local Exchange Carrier(LEC)	Competitive Local Exchange Carrier(CLEC)	Terms	States Covered	Rate (per minute)
Bell Atlantic - MD	Metropolitan Fiber Systems (MFS), Inc. - MD	<ul style="list-style-type: none"> <li>• Reciprocal Compensation</li> </ul>	<ul style="list-style-type: none"> <li>• Maryland</li> </ul>	BA-MD pays: <ul style="list-style-type: none"> <li>• 0.3¢</li> </ul> MFSI-MD pays: <ul style="list-style-type: none"> <li>• 0.3¢ at BA-MD's end offices</li> <li>• 0.5¢ at BA-MD's tandems</li> </ul>
Pacific Bell	MFS Intelenet	<ul style="list-style-type: none"> <li>• Reciprocal Compensation</li> <li>• Unbundled access to Bell loops</li> <li>• Interim numbering portability</li> </ul>	<ul style="list-style-type: none"> <li>• California</li> </ul>	0.75¢
Ameritech	ICG Telecom Group (subsidiary of IntelCom Group)	<ul style="list-style-type: none"> <li>• Reciprocal Compensation</li> <li>• ICG allowed to buy unbundled local loop services from Ameritech</li> <li>• ICG access to Ameritech's poles and operator services</li> </ul>	<ul style="list-style-type: none"> <li>• Ohio</li> </ul>	0.9¢
Bell Atlantic	Jones Intercable, Inc.	<ul style="list-style-type: none"> <li>• Calls exchanged directly between networks</li> <li>• Higher charge if either company must transport the call</li> <li>• Number portability for \$3 per month</li> </ul>	<ul style="list-style-type: none"> <li>• Virginia</li> </ul>	<ul style="list-style-type: none"> <li>• 0.7¢ for calls directly exchanged</li> <li>• 0.9¢ if either company must transport call</li> </ul>

Local Exchange Carrier(LEC)	Competitive Local Exchange Carrier(CLEC)	Terms	States Covered	Rate (per minute)
Ameritech	MFS Communications	<ul style="list-style-type: none"> <li>• Reciprocal Local Call Termination</li> <li>• Physical interconnection at any “technically feasible point”</li> <li>• MFS access to Ameritech poles, ducts, and rights-of-way</li> <li>• MFS customers access to “911”, and operator services (including Ameritech white pages listing)</li> </ul>	<ul style="list-style-type: none"> <li>• Illinois</li> <li>• Michigan</li> <li>• Wisconsin</li> <li>• Indiana</li> <li>• Ohio</li> </ul>	0.9¢
BellSouth	Time Warner Communications	<ul style="list-style-type: none"> <li>• Reciprocal Compensation</li> <li>• Deal caps compensation at 5% of the traffic differential to prevent either company from severe financial exposure</li> <li>• Non-discriminatory rates, terms and conditions for local interconnection</li> <li>• Interim number portability</li> <li>• Access to unbundled network elements</li> </ul>	<ul style="list-style-type: none"> <li>• Kentucky</li> <li>• Tennessee</li> <li>• Mississippi</li> <li>• Louisiana</li> <li>• Alabama</li> <li>• Georgia</li> <li>• North Carolina</li> <li>• South Carolina</li> <li>• Florida</li> </ul>	1¢
BellSouth	MCImetro	<ul style="list-style-type: none"> <li>• Terminating Compensation</li> <li>• Interim number portability</li> <li>• “911” Access</li> <li>• Directory listings</li> <li>• Exchange of “800” traffic</li> </ul>	<ul style="list-style-type: none"> <li>• Georgia</li> <li>• Alabama</li> <li>• Florida</li> <li>• North Carolina</li> <li>• Tennessee</li> </ul>	GA: 1¢ AL: 1¢ FL: 1.1¢ NC: 1.3¢ TN: 1.9¢

Local Exchange Carrier(LEC)	Competitive Local Exchange Carrier(CLEC)	Terms	States Covered	Rate (per minute)
BellSouth	<ul style="list-style-type: none"> <li>• Sprint Metro</li> <li>• Continental</li> <li>• Intermedia</li> <li>• Teleport</li> </ul>	<ul style="list-style-type: none"> <li>• Reciprocal Compensaton</li> <li>• Deal caps compensation at 5% of the traffic differential to prevent either company from severe financial exposure</li> <li>• Interim Number Portability</li> </ul>	<ul style="list-style-type: none"> <li>• Florida</li> </ul>	1.052 ¢
GTE	Intermedia	<ul style="list-style-type: none"> <li>• Reciprocal Compensation</li> <li>• Interim Number Portability</li> </ul>	<ul style="list-style-type: none"> <li>• Florida</li> </ul>	1.11136¢