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April 24, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Ex Parte Filing
ET Docket No. 95-183, RM 8553
IB Docket No. 97-95, RM 8811
✓ CS Docket 97-151

Dear Ms. Salas:

On April 23, 1998, representatives of WinStar Communications, Inc. met with Ari Fitzgerald, Legal Advisor to Chairman Kennard and Peter Tenhula, Legal Advisor to Commissioner Powell to discuss WinStar's positions on sharing with satellite services in the 38.6-40.0 GHz band. Representatives of WinStar included Joseph Sandri, Jr., Barry Ohlson, Phil Verveer, and the undersigned.

During the meeting, WinStar circulated and discussed the points contained in the attached handout. It also reiterated its comments from ET Docket 95-183 and IB Docket 97-95 that sharing between terrestrial fixed wireless operations and satellite providers is infeasible in the 38.6-40.0 GHz band. With Mr. Fitzgerald, WinStar additionally discussed its pleadings from CS Docket 97-151 concerning rooftop access.

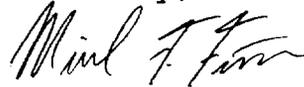
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1155 21st Street, NW
Washington, DC 20036-3384
202 328 8000

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Ms. Magalie Roman Salas
April 24, 1998
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Pursuant to the Commission's rules, six copies of this document are being filed with your office. Should you or the Commission staff require further information concerning the attached documents, please feel free to contact Michael Finn at (202) 429-4786.

Sincerely,

A handwritten signature in cursive script that reads "Michael F. Finn".

Michael F. Finn

Enclosure

cc wo/enclosure: Ari Fitzgerald
Peter Tenhula

WINSTAR[®]

Building A National Local Communications Company

CAPACITY	CONNECTIVITY	CONTENT
<ul style="list-style-type: none">● Fixed Wireless Broadband circuits for CLEC business● Wholesale to other carriers	<ul style="list-style-type: none">● Facilities-based CLEC; local, long distance, Internet and information services● Broadband data services, including: LAN/WAN connections; video; ISP Network Backbone; VAR/System Integration	<ul style="list-style-type: none">● Customized information and programs delivered over the internet to business and education markets

WINSTARO

Telecommunications Environment Rich in Opportunities for WinStar

Competitive Landscape Undergoing Fundamental Change:

- Monopolies under attack by regulators and competitors
- RBOCS poorly positioned to defend market share
- Large population of small and medium-sized businesses seeking alternative providers

Increasing Gap Between Computing Power and Delivery Systems:

- Critical shortage of high-speed broadband circuits
- On and off ramps needed for Information Superhighway

The WinStar Advantages

- **Unequaled expertise in using millimeter microwave technology to provide broadband telecommunications services**
- **Nationwide voice and data network serving 21 largest U.S. markets... 30 markets by year-end**
- **Unencumbered by legacy systems**
- **Managerial expertise in attacking monopolies**

WINSTAR®

38 GHz Licenses are a Unique Strategic Asset

- **WinStar has largest bandwidth / population coverage in U.S.**
- **Licenses in more than 125 cities with population over 100,000, including top 50 U.S. markets**
- **Unmatched speed-to-market**
- **Favorable cost structure**
- **WinStar uniquely positioned to enable local market access on a national basis**

Extensive Bandwidth Supporting Voice and Data Services to all Major Markets

Channel capacity by market

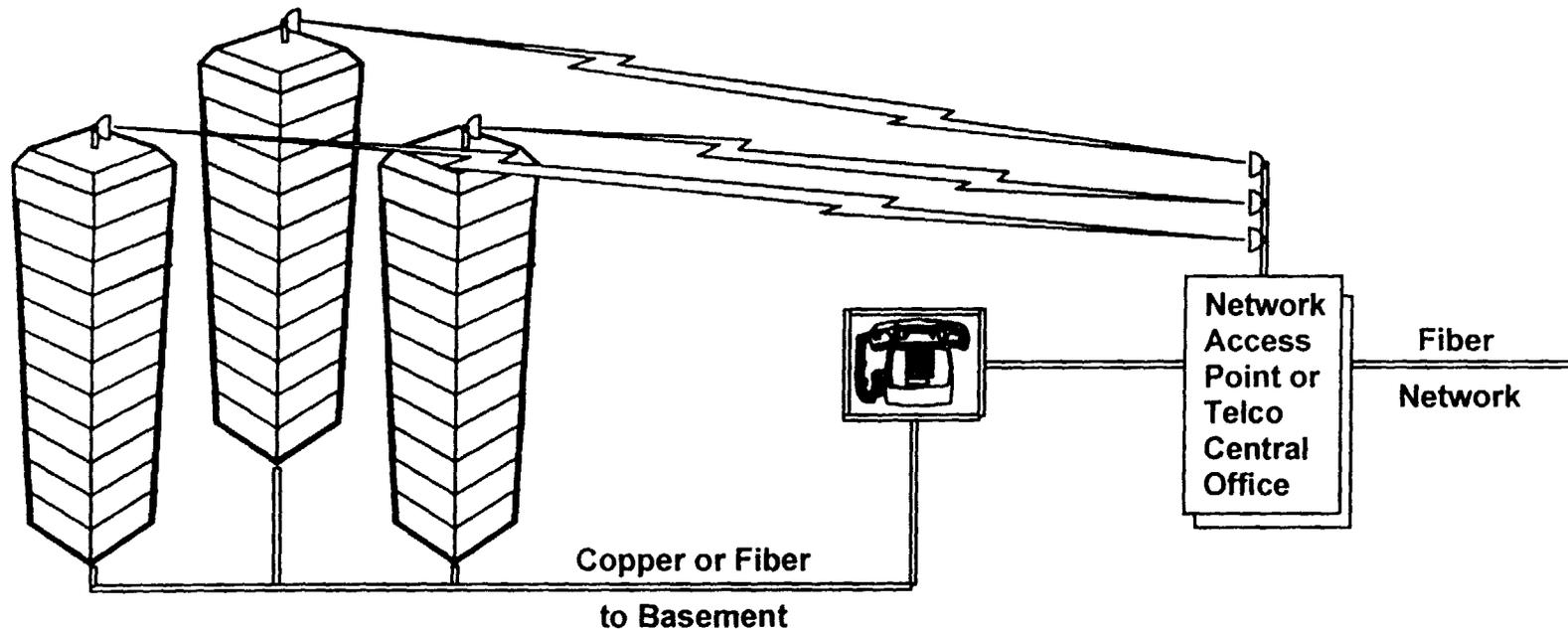
More than 1,000 MHz	10 channels (1,000 MHz)	9 channels (900 MHz)	8 channels (800 MHz)	7 channels (700 MHz)	6 channels (600 MHz)	5 channels (500 MHz)
Fresno Greensboro Modesto New Orleans Norfolk Oakland Orlando Provo San Francisco San Jose Salt Lake City	Ft Lauderdale Miami Tampa	Atlanta Cincinnati Fort Worth Houston New York Spokane St. Louis	Buffalo Dallas Seattle	Chicago Denver Minneapolis Phoenix	Baltimore Bergen-Passaic Boston Detroit Kansas City Los Angeles Memphis Milwaukee Newark Orange County Philadelphia Pittsburgh San Juan, PR Trenton	Cleveland Indianapolis Las Vegas Louisville Riverside Tacoma Washington, DC

- Bandwidth averages more than 750 MHz in top 30 markets...
approximately 740 MHz in top 50 markets

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How Point-To-Point Wireless Fiber Service Works

Functional Equivalent of Fiber but Faster and Lower Cost to Install



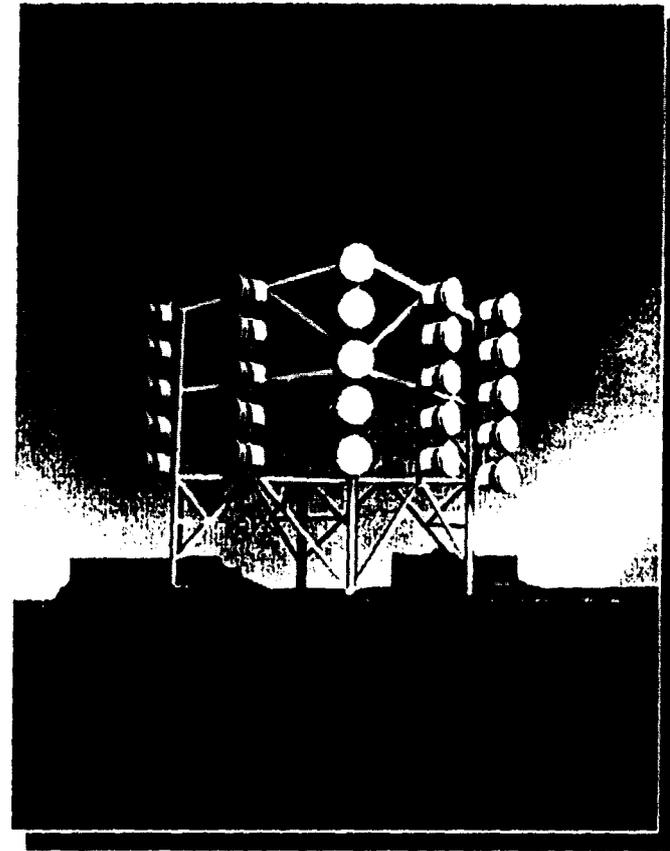
99.999% reliability ("five nines")

10^{-13} bit error rate

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125 Hubs To Be Completed by Year End

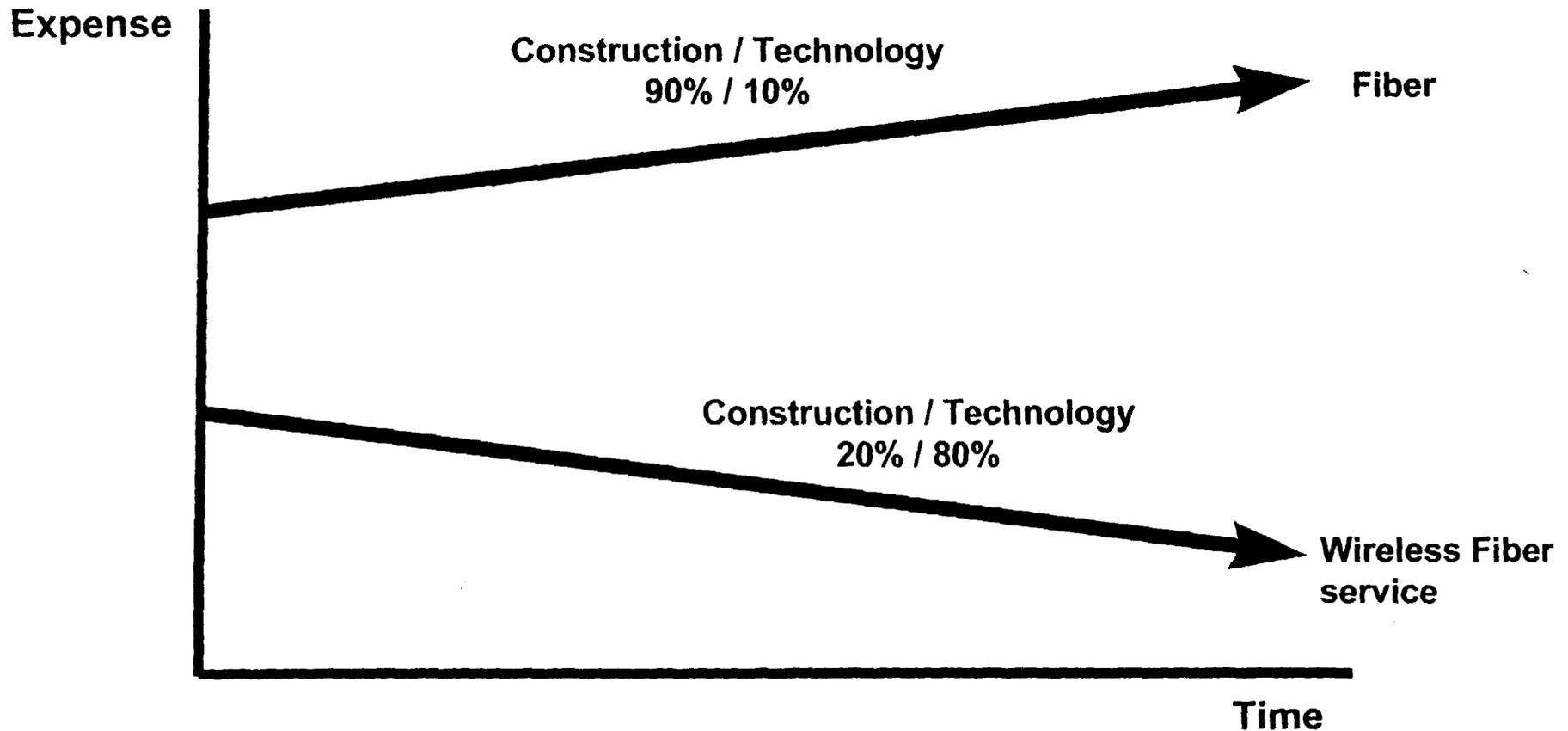
- **Point-to-Point Hubs address up to 50 remote radios**
- **Point-to-Multipoint technology can be implemented with existing hubs**



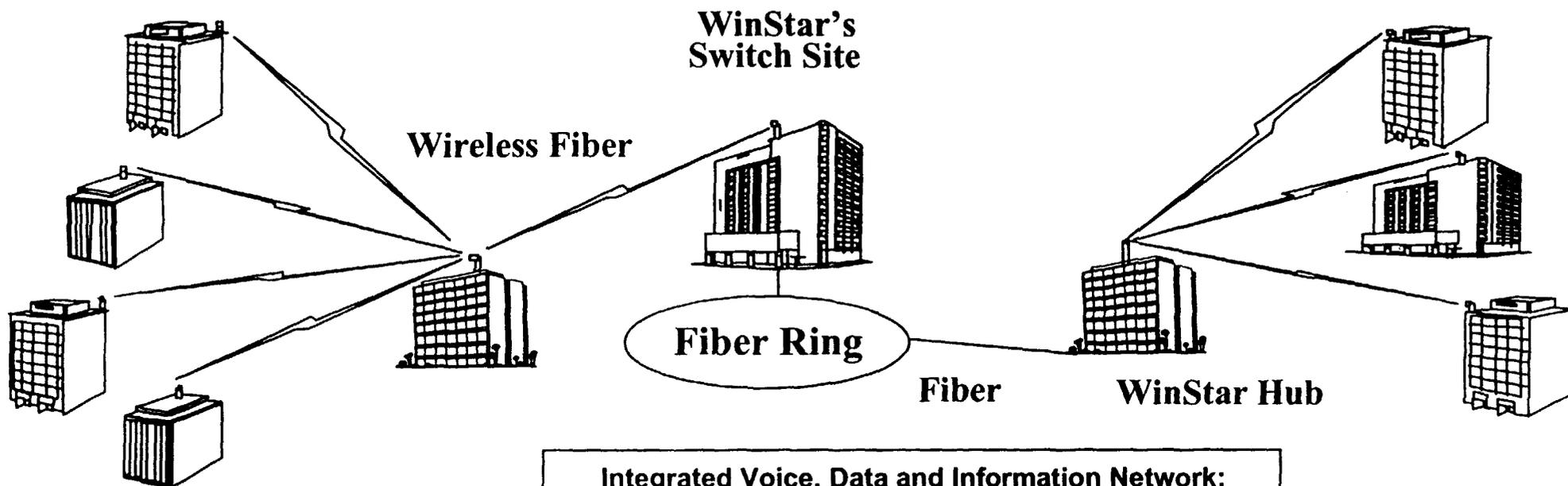
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WinStar's Cost Advantage

Cost to Build New Capacity: Fiber vs. Wireless Fiber Service



How Multipoint Technology Works



Integrated Voice, Data and Information Network: Services Provided

- Voice Telephone
- Fax and modem
- High-speed Internet
- Fixed or Variable-Rate Data Communications
- Native LAN to LAN
- Video Conferencing
- Information Services

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Benefits to Multipoint Network Architecture

- **More efficient use of spectrum**
- **Lower network build-out and operating costs**
- **Bandwidth on demand**
- **Significantly expands addressable market**
- **Integrates voice/video/data network**

Favorable Economics of Wireless Fiber Circuits

Cost per installed T-1

Radios	1995	1996/97	1998/99	Beyond 1999
<i>4x</i>	<i>\$3,500</i>			
<i>DS-3</i>		<i>\$800</i>		
<i>OC-3</i>			<i>\$400</i>	
<i>Multiple point-to-point</i>				<i>\$200</i>

Building the WinStar Brand

- Media Advertising
- “Building-centric” marketing
 - owners and managers
 - tenants

What You Need From Your Phone Company
Isn't A Dial Tone, But A Pulse.



There's more to a phone line than a dial tone. There's a pulse. A pulse that means you're connected to a service that can help you get the most out of your phone. A pulse that means you're connected to a service that can help you get the most out of your phone. A pulse that means you're connected to a service that can help you get the most out of your phone.

WinStar is WinStar. A phone company that makes it our business to make sure you get the most out of your phone. A phone company that makes it our business to make sure you get the most out of your phone. A phone company that makes it our business to make sure you get the most out of your phone.

WINSTAR
The New Phone Company

WINSTAR

New Media Supports CLEC Growth

- **Differentiates WinStar's CLEC Services**
- **Drives Usage of Network**
- **Reduces Customer Churn**

Broadband Data Services

- **Enormous Revenue Opportunity**
 - **\$10 Billion Market**
 - **Completes bundled Service Offering**
- **Expanded services offering enables WinStar to target large businesses**
- **ATM, IP, frame relay data transport over national backbone**
- **LAN/WAN Professional Services**
- **Equipment Vendor/Channel Partnerships**

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“Building-centric” Marketing

Initial Target Buildings

- **>8,000 Buildings**
 - ◆ **>2.1 billion square feet**
 - ◆ **>9.7 million workers**
 - ◆ **>4 million voice lines**

Multipoint Target Buildings

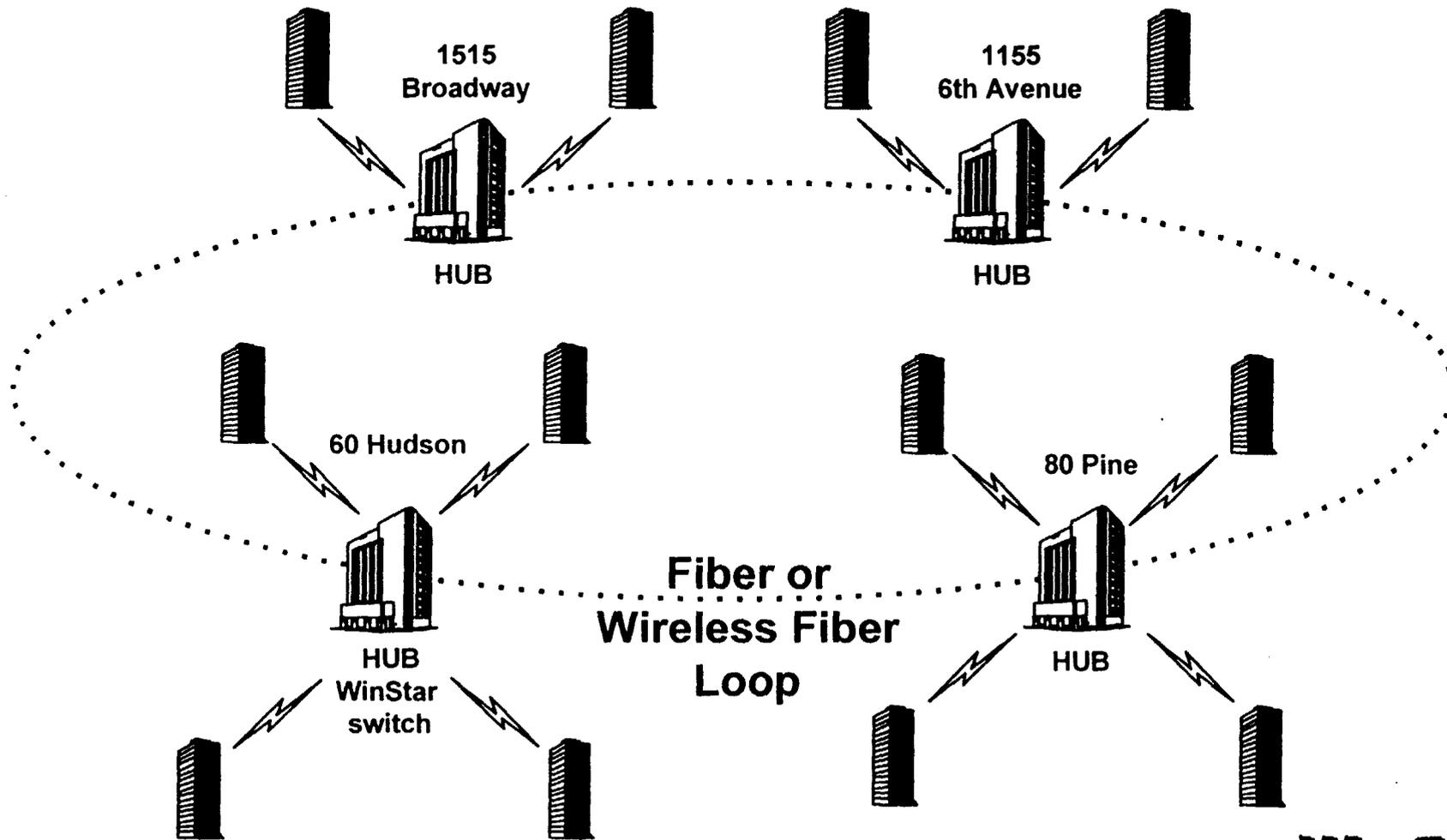
- **Market expands to >30,000 buildings**
 - ◆ **\$47 billion Market**
- **More than 75% of Target Buildings Have No Competitive Fiber**

New York City Business Model

- 1) Identified target buildings**
- 2) Parallel activities:**
 - installed switch**
 - resold NYNEX**
 - acquired roof rights**
 - built hub sites**
- 3) Customers put on WinStar switch**
- 4) Resold NYNEX lines replaced by Wireless Fiber circuits ... customer put “on net”**

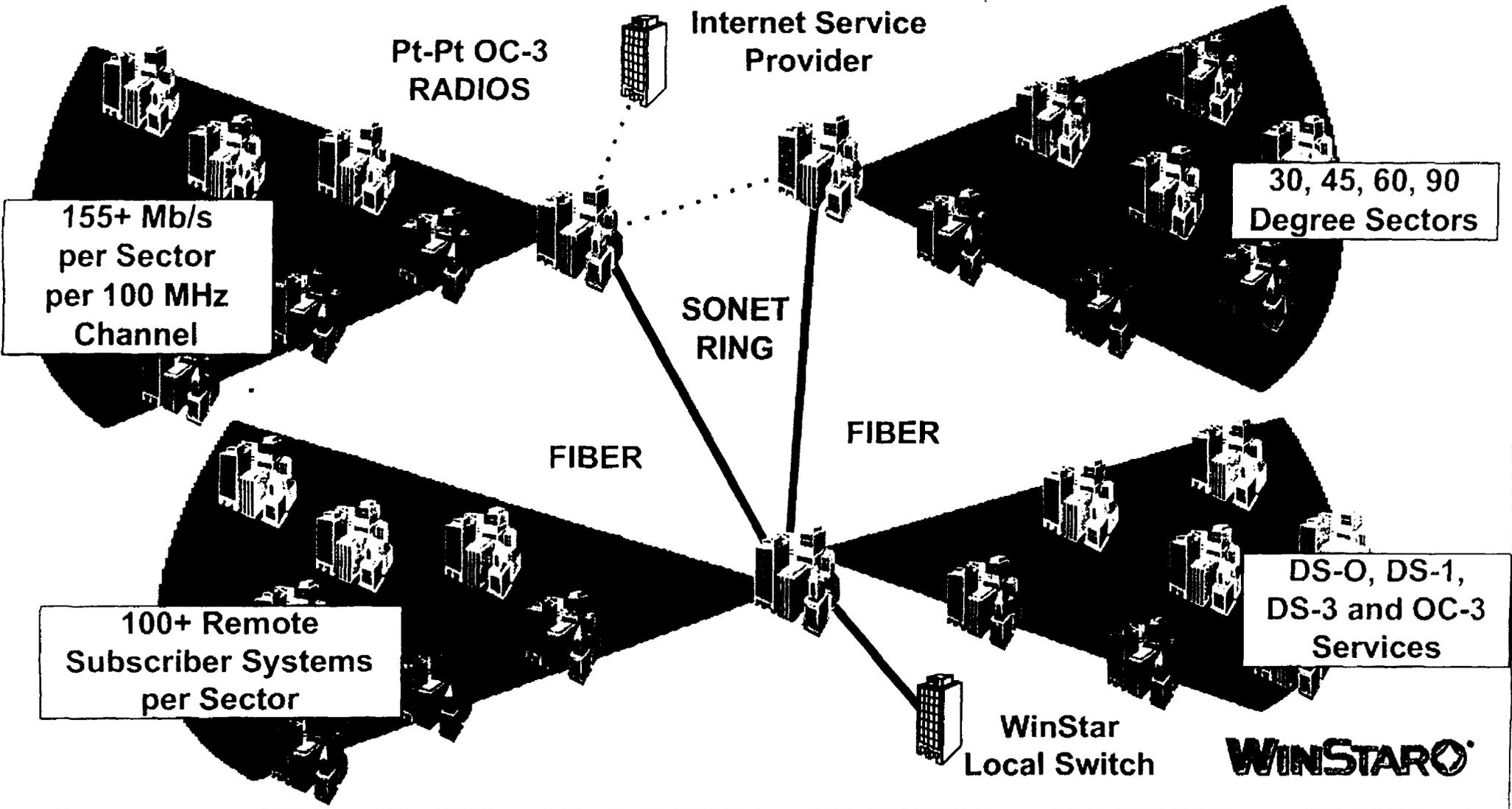
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New York City Network



WINSTAR

WinStar Point to Multipoint Metropolitan Area Network



Expanding Network of Switched Cities

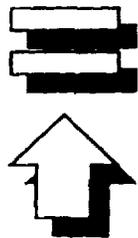
● Lucent Class 5 ESS-2000 Switches

Switched Services Available May 1998			1998 Year End
New York	Dallas	Tampa	Milwaukee
Chicago	Denver	Philadelphia	Stamford
Los Angeles	Minneapolis	Kansas City	Miami
Boston	Fort Worth	Baltimore	Detroit
San Diego	Atlanta	Columbus	St. Louis
Newark	Houston	Seattle	Cleveland
Washington, DC	San Francisco	Phoenix	Oakland
			Orange County, CA
			Oak Brook, IL

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Economics of 38 GHz On/Net Strategy

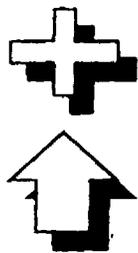
Highest Telephony Margins Possible



Gross Margin
60-70%

- Switched local services
- Long distance
- Internet serving
- Other info services

Nationwide Infrastructure



Gross Margin
25-30%

- Local switched services resale
- Long distance
- Internet services

38 GHz Spectrum Covering 190 Million POPs

Gross Margin
15-20%

- Long distance
- Internet services

Highest Gross Margins
in CLEC Business

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Important Measurements of Progress

An Expanding National Presence

	July 1996	Current	Projected
<i>Major Markets with CLEC Sales Offices</i>	<i>1</i>	<i>21</i>	<i>30+</i>
<i>CLEC Field Sales Personnel</i>	<i>35</i>	<i>400</i>	<i>600</i>
<i>Major Markets Covered by Interconnect Agreements</i>	<i>1</i>	<i>44</i>	<i>50+</i>
<i>Major Markets with CLEC Authorizations</i>	<i>11</i>	<i>48</i>	<i>50+</i>

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