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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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April 24, 1998

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.

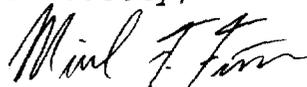
*Handwritten signature and initials*  
\_\_\_\_\_  
ONE

Three Lafayette Centre      Tele: RCA 229800  
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202 328 8000

Ms. Magalie Roman Salas  
April 24, 1998  
Page 2

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<sup>®</sup>**

# Building A National Local Communications Company

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

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# **Telecommunications Environment Rich in Opportunities for WinStar**

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## **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**

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# **The WinStar Advantages**

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- **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**

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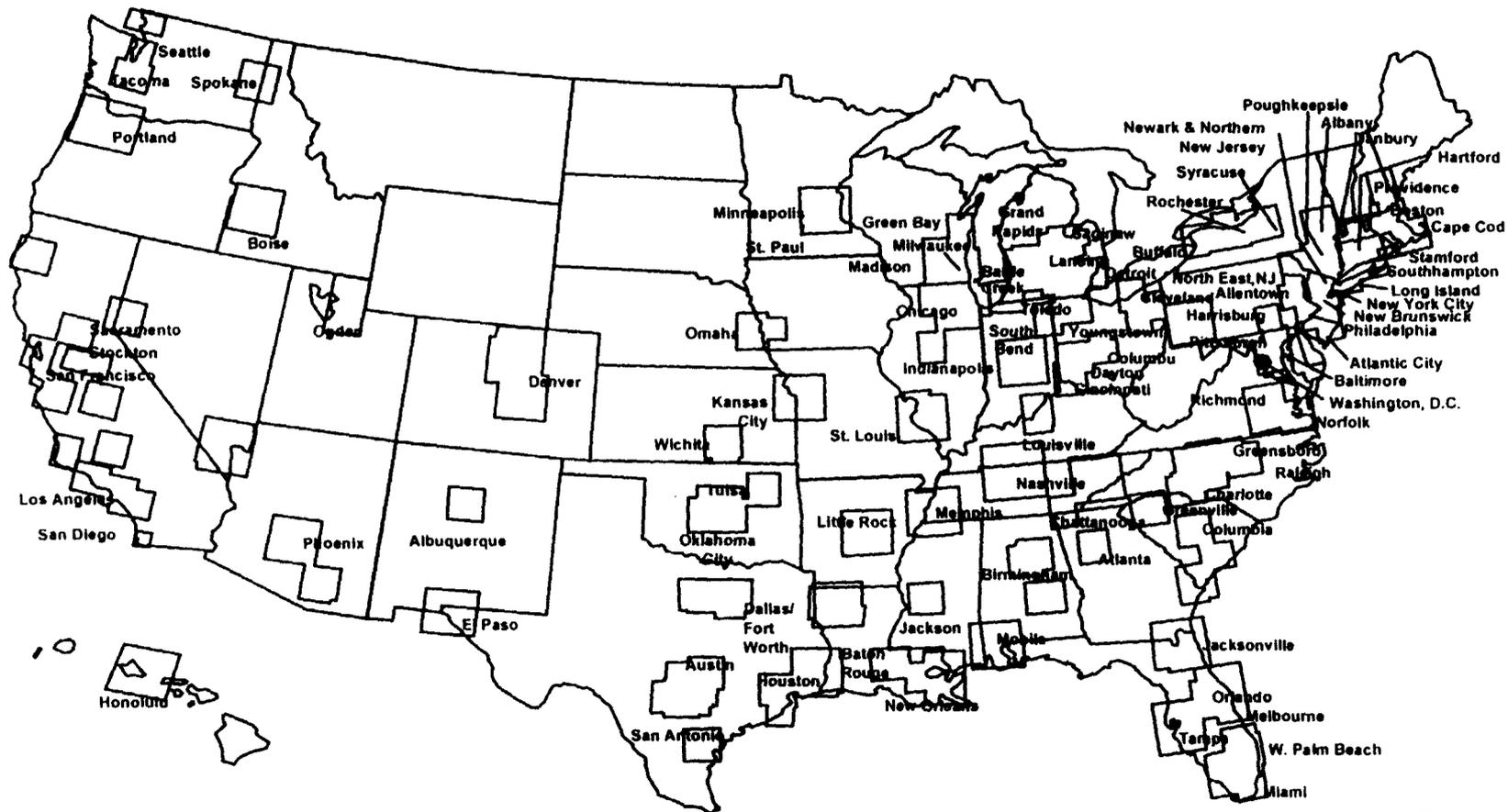
# **38 GHz Licenses are a Unique Strategic Asset**

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- **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**

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# WinStar is Largest Holder of Spectrum in U.S.



- Licenses cover population of almost 190 million
- One billion channel POPs

San Juan  
Puerto Rico

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# Extensive Bandwidth Supporting Voice and Data Services to all Major Markets

## Channel capacity by market

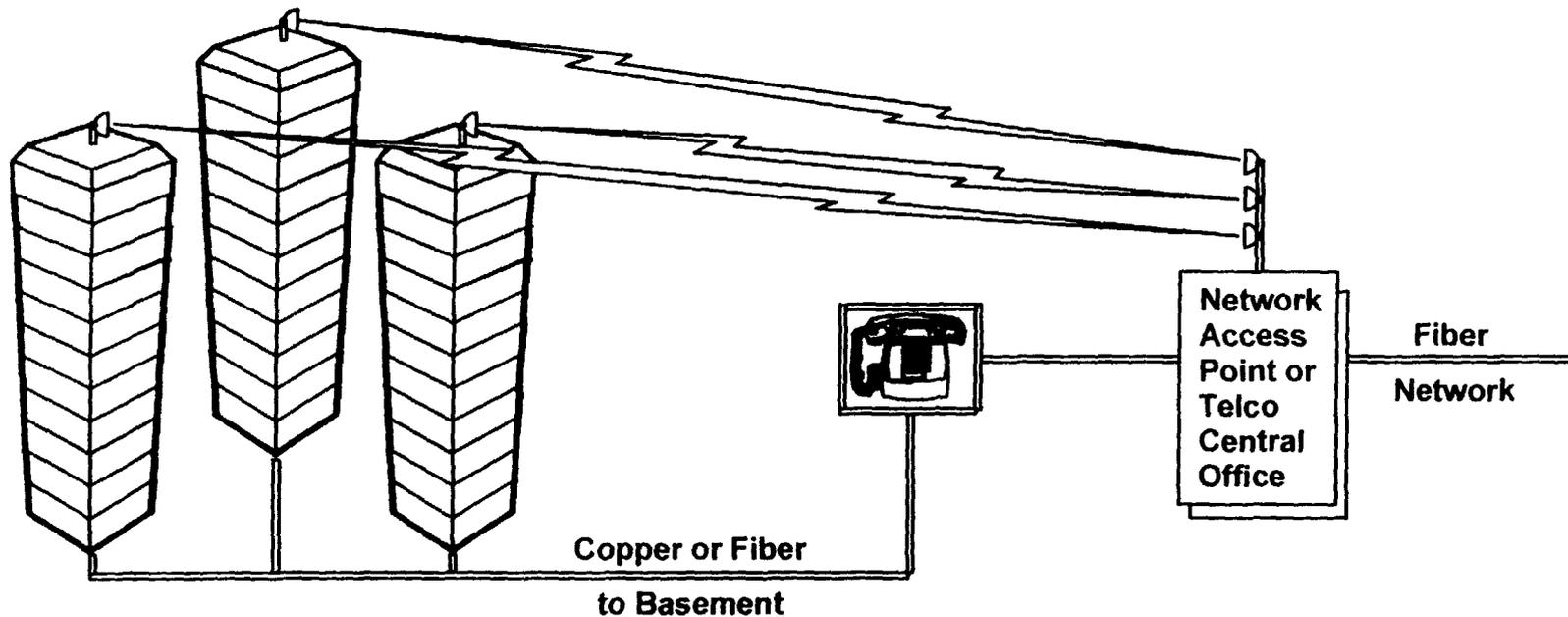
More than 1,000 MHz	10 channels (1,000 MHz)	9 channels (900 MHz)	8 channels (800 MHz)	7 channels (700 MHz)	6 channels (600 MHz)	5 channels (500 MHz)
Fresno Greensboro Modesto New Orleans Norfolk Oakland Orlando Provo San Francisco San Jose Salt Lake City	Ft Lauderdale Miami Tampa	Atlanta Cincinnati Fort 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")**

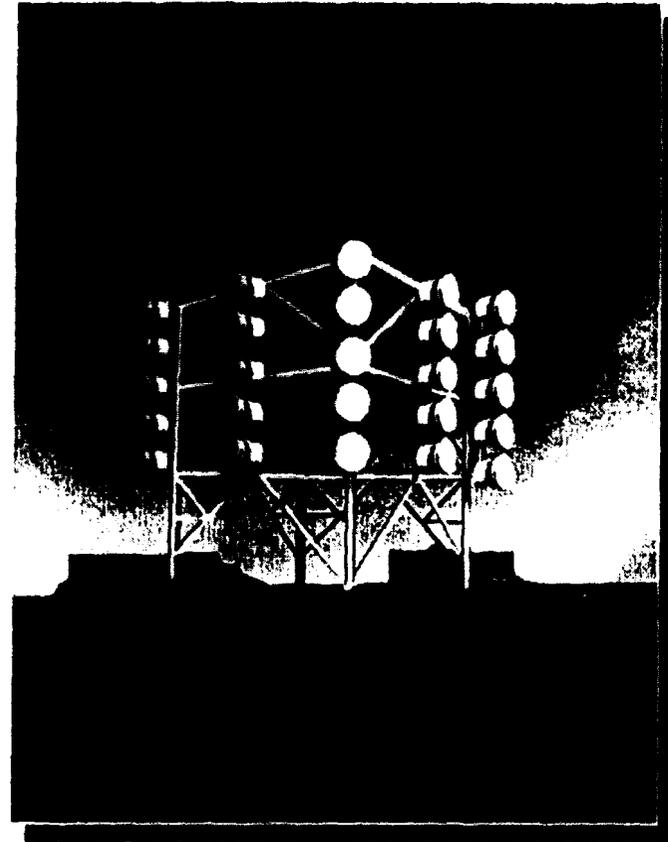
**$10^{-13}$  bit error rate**

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# **125 Hubs To Be Completed by Year End**

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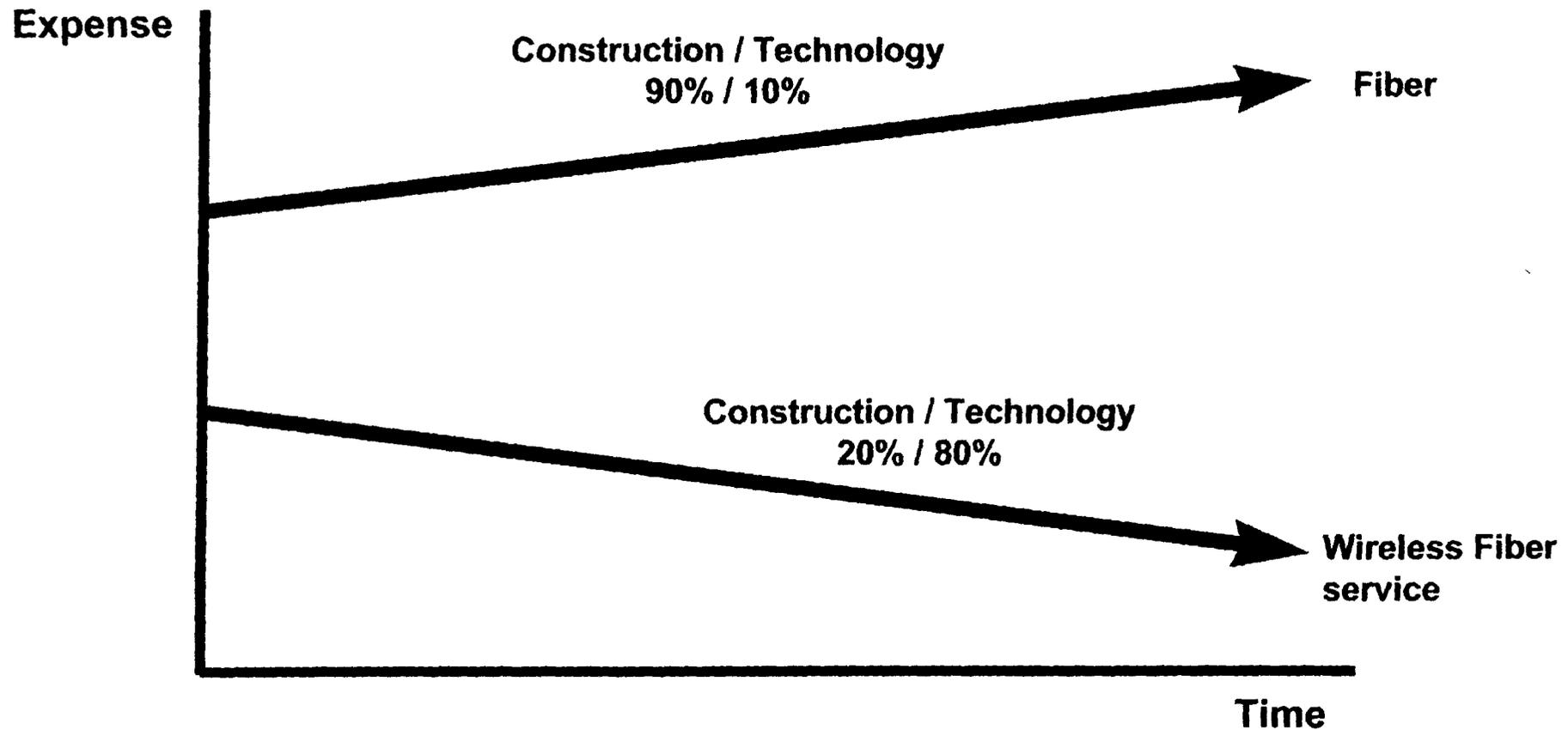
- **Point-to-Point Hubs address up to 50 remote radios**
- **Point-to-Multipoint technology can be implemented with existing hubs**



**WINSTARO**

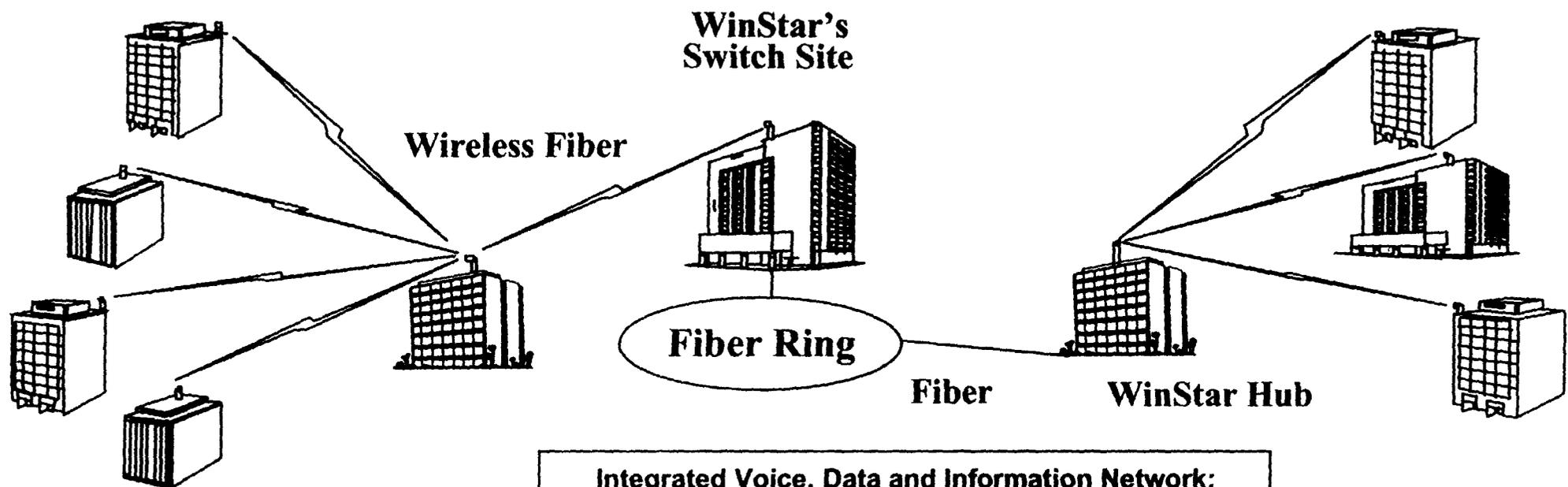
# WinStar's Cost Advantage

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



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# 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**

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- **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
4x	\$3,500			
DS-3		\$800		
OC-3			\$400	
Multiple point-to-point				\$200

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# 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.



Most people think of a dial tone. But for those who understand business, the tone isn't the answer. It's the pulse that counts. The pulse that connects you to the people who matter. The pulse that makes your business work.

WinStar is WinStar. A pulse company. Our pulse is our business. We provide the pulse that makes your business work. We provide the pulse that makes your business work. We provide the pulse that makes your business work.

**WINSTAR**  
The New Phone Company

**WINSTAR**

# **New Media Supports CLEC Growth**

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

# **Broadband Data Services**

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- **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**

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## ***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**

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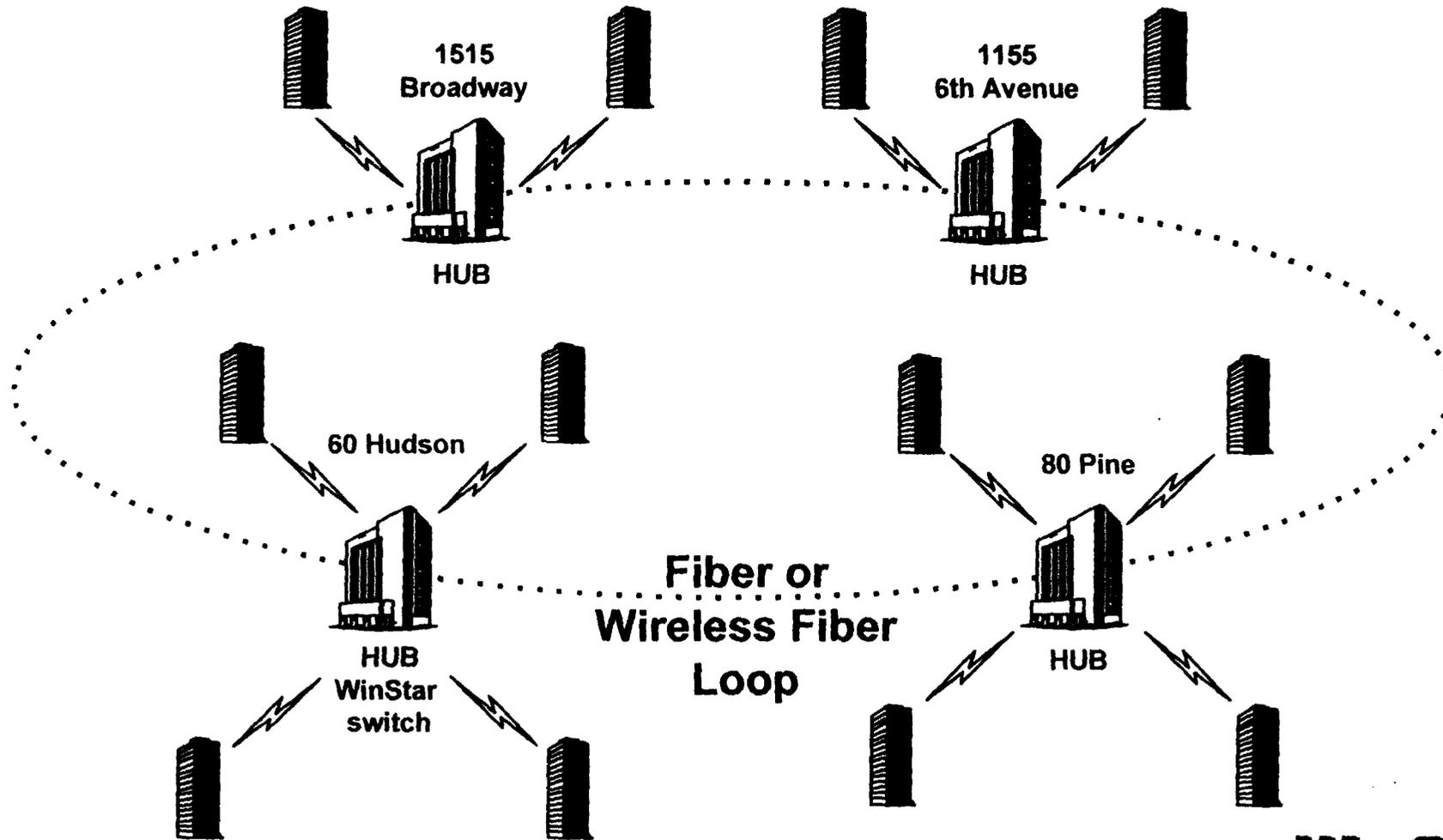
# **New York City Business Model**

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- 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”**

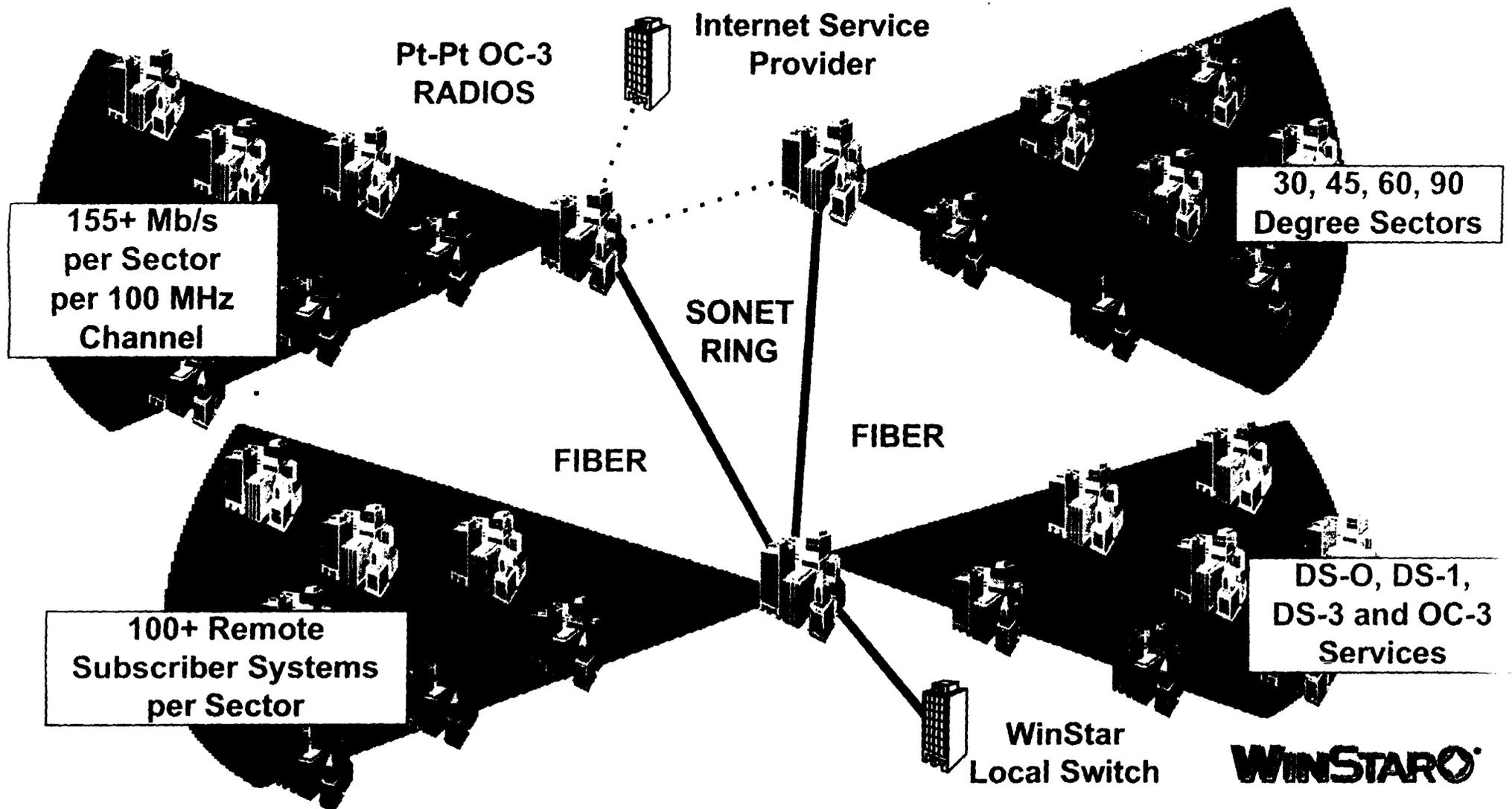
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# New York City Network



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# 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

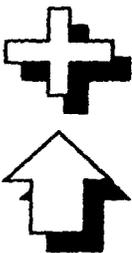
Highest Telephony Margins Possible



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**

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## ***An Expanding National Presence***

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

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