

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C 20554

In the Matter of)
)
Developing a Unified Inter-carrier)
compensation Regime)
)
Sorint Comoration Petition for Declaratorv)
Ruling Regarding the Routing and Rating of)
Traffic by ILECs)

CC Docket 01-92 RECEIVED

AUG 19 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS OF THE RURAL CELLULAR ASSOCIATION

The Rural Cellular Association ("RCA")¹ submits reply comments in response to the petition of Sprint Corporation ("Sprint") for declaratory ruling seeking confirmation that an incumbent local exchange carrier ("ILEC") may not refuse to load telephone numbering resources of an interconnecting carrier, and may not refuse to honor the routing and rating points designated by that interconnecting carrier.²

In its Notice, the Commission requests comment on practices and issues raised in Sprint's petition and BellSouth Telecommunications, Inc. ("BellSouth's") opposition, "including the appropriate intercarrier compensation" applicable to the telecommunications traffic that is at issue in this dispute.³ The traffic at issue is routed through tandem switching facilities, rather

¹ RCA is an association representing the interests of small and rural wireless licensees providing commercial services to subscribers throughout the nation. Its member companies provide service in more than 135 rural and small metropolitan markets where approximately 14.6 million people reside. RCA was formed in 1993 to address the distinctive issues facing rural wireless service providers.

² *Comment Sought on Sprint Petition for Declaratory Ruling Regarding the Routing and Rating of Traffic by ILECs: Public Notice*, CC Docket No. 01-92, DA 02-1740 (rel. July 18, 2002) ("Notice").

³ *Id.* at 3.

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than through direct interconnection facilities.⁴

As previously demonstrated by RCA, the adoption of a “bill and keep” mechanism **as** the governing principle guiding the interconnection relationship between CMRS providers and ILECs would serve the public interest by providing cost savings and administrative simplicity.⁵ As one commenter now observes in the context of the Sprint/BellSouth dispute, adoption of a “bill and keep” regime would also serve the public interest in that it would lower costs for service by eliminating the ILEC’s ability “to charge CMRS carriers unreasonable and excessive rates for intra-MTA traffic that transits the ILEC’s network and terminates on a CMRS carrier’s network.”“

⁴ *Id.* at 1.

See Reply Comments of RCA in CC Docket No. 01-92, filed November 5,2001 at 4,
Comments of Nextel Communications at **9**

Accordingly, for the benefit of the public interest, the Commission must hasten its migration to a "bill and keep" compensation regime to govern the relationship between CMRS providers and ILECs.

Respectfully submitted,

RURAL CELLULAR ASSOCIATION

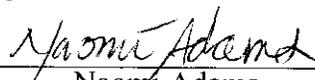
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August 19, 2002

CERTIFICATE OF SERVICE

I, Naomi Adams do hereby certify that a copy of the foregoing "Reply Comments of the Rural Cellular Association" was served on this 19th day of August 2002, via hand delivery or first class U.S. Mail, postage prepaid to the following parties:


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