

Associated Communications & Research Services

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Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D. C. 20554

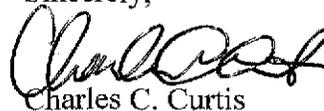
RE: Notice of Ex Parte Comments:
Inter Carrier Compensation – Docket CC 01-92
Petition for Declaratory Ruling – DA 02-2436

Madam Secretary:

With regards to the specific above mentioned docket and proceeding, we submit comments stating that with regards to LEC-CMRS intra-MTA traffic, the FCC has already ruled in the matter which is consistent with the position held by the Oklahoma Rural Telephone Companies. In MO&O FCC 00-194, *TSR Wireless, LLC, et al, versus US West Communications, Inc., et al*, the RBOC LATA restrictions require intra-MTA calls that cross LATA boundaries to be routed to the IXC for termination to the wireless network, governed by intrastate access charge rules rather than reciprocal compensation. Similar restrictions apply to Oklahoma access providers for all inter-exchange traffic, whether it is within or between LATA boundaries. In such cases, the traffic is governed by access charge rules, rather than local interconnection. This is specifically noted in the above referenced proceeding in paragraph 31.

The FCC has already recognized that the RBOC has no responsibility for reciprocal compensation when the same RBOC is not the toll provider due to LATA restrictions. Such a ruling reflects the obvious distinction and restrictions between an access provider and a toll provider, with regards to the exchange of intra-MTA traffic with inter-connecting carriers. The Oklahoma Rural Telephone Companies who provide access rather than toll services are, likewise, also restricted from both providing inter-LATA toll services and intra-LATA inter-exchange toll services. In conclusion, the Commission should reject the CMRS petitioners' requests and conclude that reciprocal compensation does not apply to access providers who route calls to an IXC, for inter-exchange traffic. In accordance with FCC rules, these comments are being filed electronically.

Sincerely,



Charles C. Curtis

Vice President – Strategic Planning

LETTER WITH EXHIBIT