Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Developing a Unified Intercarrier Compensation Regime	)	WCB Docket No. 01-92
	)	
	)	

REPLY COMMENTS OF LEAP WIRELESS INTERNATIONAL, INC.

Leap Wireless International, Inc., on behalf of itself and its affiliated entities (collectively, "Leap"), submits these reply comments in the above-captioned Further Notice of Proposed Rulemaking ("FNPRM").[1]

I. SUMMARY

A number of parties that have commented in this proceeding urge the Commission to implement bill and keep for all forms of traffic and to do so quickly. The longer that the Commission delays reform, the more intractable the current inefficiencies and inequities will become. Further, as Leap noted in its opening comments, the problems with the current system are even more pronounced for smaller wireless carriers like Leap that provide service in small to mid-sized markets. While there have been many proposals submitted to the Commission advocating various methods for intercarrier compensation reform, the CTIA Proposal is the only proposal that truly implements bill and keep in a timely manner while also accomplishing the Commission's other goals of promoting efficiency; eliminating arbitrary regulatory distinctions; and advancing competitive

[1] *Developing a Unified Intercarrier Compensation Regime*, FCC 05-33, CC Docket No. 01-92, Further Notice of Proposed Rulemaking ("IC FNPRM") (Mar. 3, 2005).

and technological neutrality. Moreover, to the extent that the Commission implements a transition to bill and keep, Leap agrees with MetroPCS that the Commission should adopt bill and keep on a "flash-cut" basis for wireline-wireless interconnection and exchange of traffic.

In addition to adopting bill and keep immediately, Leap and other parties demonstrate the urgent need for the Commission to reaffirm basic interconnection principles that some incumbent local exchange carriers ("ILECs") are attempting to circumvent or avoid, including their obligations: to permit carriers to interconnect at one point of interconnection within a local access and transport area ("LATA"); to provide competitive and wireless carriers the right to interconnect indirectly; and to provide transiting services at cost-based rates. Finally, Leap notes that the record reflects that the Commission should implement universal service reform based on forward-looking costs.

II. THE RECORD SUPPORTS AN IMMEDIATE TRANSITION TO BILL AND KEEP

Although rural carriers and state commissions favor retaining some level of intercarrier compensation, for the most part, the record reflects that carriers across all other sectors of the industry (wireless, large incumbent carriers, and competitive) support bill and keep[2] as the best method for achieving the Commission's goals of (i) competitive and technological neutrality; (ii) dismantling

[2] *See generally* Allied National Paging comments; Dobson Cellular comments; CTIA Proposal; ICF Proposal; MetroPCS comments; Leap comments; National Cable Television Association comments; Nextel comments; Qwest comments; SBC comments; Sprint comments; Time Warner Inc. comments; United States Cellular Corporation comments; Verisign comments.

arbitrary regulatory distinctions; and (iii) promoting efficiency and facilities-based competition. The record also demonstrates that concerns about bill and keep's impact on intercarrier revenues, facilities-based competition, and new arbitrage opportunities are unfounded and should be dismissed.

A. The Comments Illustrate That Bill and Keep Promotes Efficiency

In addition to Leap, a number of other parties note that the current calling party network pays ("CPNP") system results in a multitude of inefficiencies, including among other things, the shifting of carrier network costs and considerable regulatory and administrative costs.[3] Bill and keep eliminates these inefficiencies.

Specifically, by adopting bill and keep, the Commission will promote its goal of efficiency by ensuring that carriers operate their networks as efficiently as possible, and eliminating the tendency for terminating monopoly carriers to impose their costs onto other carriers. As the ICF noted, "aligning cost recovery with the party who has the ability to choose the provider… allows market forces to efficiently govern rates and drive them toward efficient levels."[4] Moreover, (as discussed below) bill and keep will help reduce opportunities and incentives for arbitrage. As T-Mobile notes, "[a]s long as carriers are permitted to impose costs on other carriers (and their customers) in the form of access charges and reciprocal compensation, they will have no incentive to operate efficiently to reduce those costs."[5] Ultimately,

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[3] *See, e.g.*, T-Mobile comments at 9; CTIA comments at 12-13; SBC comments at 34; ICF comments at 29.

[4] ICF comments at 29.

[5] T-Mobile comments at 9.

competition is the casualty under a system in which incumbent carriers can shift their inefficient costs onto competitors.[6] This in turn means higher costs for consumers, as well as a bloated universal service program.

In addition to eliminating inefficient network operations, many parties note that bill and keep eliminates administrative inefficiencies and the need for regulatory oversight.[7] Specifically, CTIA observes that the bill and keep system "will dramatically reduce the need for regulatory oversight of interstate or intrastate access or reciprocal compensation" and reduce the need to monitor end user rates.[8] Further, both the ICF and CTIA note that a default system of bill and keep will "eliminate the need for carriers to track, bill and collect charges for traffic exchanged with other carriers and related auditing activities, as well as disputes and litigation" and eliminate the "endless rate proceedings [associated with a CPNP model that]… create massive transaction costs and harmful uncertainty."[9] Indeed, Verizon Wireless points out that to the extent that carriers complain about administrative issues such as the difficulty of tracking "phantom traffic,"[10] the "best solution to these problems [of phantom traffic] is a system that depends as little as possible on the availability of such information."[11]

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[6] *See* T-Mobile comments at 9-10.

[7] *See, e.g.*, CTIA comments at 17-18; Qwest comments at 20-21; Nextel comments at 1; ICF comments at 15; SBC comments at 13.

[8] CTIA comments at 17.

[9] CTIA comments at 18; ICF comments at 15.

[10] *See, e.g.*, Rural Iowa Independent Telephone Association comments at 16.

[11] Verizon Wireless comments at 6-7.

Leap and MetroPCS also emphasize that the administrative inefficiencies of a CPNP system are particularly burdensome for smaller carriers. MetroPCS explains that certain Commission policies, including the decision to eliminate pick and choose under Section 252(i), have especially exacerbated costs for small carriers, because they are required now either to opt into an entire agreement that is not appropriate for their business, or spend considerable amounts of resources to negotiate a new interconnection agreement.[12] Similarly, Leap notes that it has been forced to spend an inordinate amount of resources on administrative expenses under the current CPNP regime, such as on monitoring traffic, establishing billing systems, and implementing bill payment and verification.[13] Under bill and keep, these administrative and transaction costs will be substantially reduced, if not eliminated.

Although some parties raise concerns that bill and keep will dampen facilities-based competition or not allow carriers to recover the costs of networks,[14] Leap believes that these concerns are unfounded. In fact, the migration to a bill and keep system may actually stimulate network investment in rural areas. In this regard, US Cellular Corporation notes that wireless carriers will only invest in "superior, state-of-the-art services in rural areas… with the aid of fair regulatory

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[12] MetroPCS comments at 6.

[13] Leap comments at 7.

[14] Rural Iowa Independent Telephone Association comments at 8; Iowa Telecommunications Association comments at 4.

policies that spur rational investment in technologies."[15] The National Cable Television Association further highlights that bill and keep will prevent legacy networks from impeding the growth of new competitive networks "by offloading their costs to their new rivals."[16]

In addition, T-Mobile points out that it is a fallacy that under bill and keep, carriers will be left with stranded costs that they cannot recover. Specifically, the implementation of a bill and keep system "does not mean that carriers must perform any and all services for other carriers at no cost;" carriers may continue to recover for services besides termination, such as transport and transit services.[17] Finally, the assertion that certain carriers will be overly burdened under bill and keep itself assumes that traffic is not in balance; however, the National Cable Television Association points out that bill and keep is economically rational and that traffic is roughly in balance, but even where it is not, "the cost of terminating traffic is very low."[18]

Contrary to the suggestion of some parties,[19] bill and keep will not necessarily result in higher costs for consumers. SBC notes that under a bill and keep system, consumers will merely "pay directly and efficiently the termination costs they now already pay indirectly and inefficiently (in the form of passed-

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[15] US Cellular comments at 2.

[16] NCTA comments at 6.

[17] T-Mobile comments at 11-12.

[18] NCTA comments at 7.

[19] *See, e.g.*, Iowa Telecommunications Association comments at 4-5.

through intercarrier compensation),"[20] leading to "lower charges for end users in the aggregate" due to the greater network efficiencies.[21] This should be the case for all customers – including rural carrier customers – who currently pay various forms of terminating charges.

Accordingly, the record provides considerable support for the Commission to implement a default system of bill and keep as it would advance its goals of efficiency and facilities-based competition, with minimal regulatory intervention and enforcement.

B. The Record Reflects That Bill and Keep is Technologically and Competitively Neutral

Many parties also echo Leap's comment that the current CPNP system is not competitively neutral, favors legacy wireline interests, and creates artificial arbitrage opportunities.[22] Once again, the record demonstrates that bill and keep is the best solution to these problems.

Specifically, commenters criticize the current system as skewed toward the wireline industry and based on arbitrary distinctions that ultimately disadvantage certain sectors or technologies – such as wireless. Even incumbent wireline carrier SBC acknowledges that the traditional system of reciprocal compensation for "local" calls and access charges for "long distance" calls make no sense in a world where

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[20] SBC comments at 12.

[21] SBC comments at 12.

[22] Comptel/ALTS comments at 3; T-Mobile comments at 3; US Cellular comments at 2-3; MetroPCS comments at 3; Verizon Wireless comments at 4; Time Warner comments at 8; Sprint comments at 5.

traffic is no longer segregable on a geographic basis. SBC notes that these "arbitrary regulatory distinctions" ultimately create costs for the industry in litigation and arbitrage, instead of promoting efficiency or enhancing value.[23] SBC notes that most of the reform proposals (other than the ICF- or bill and keep proposals) would retain these arbitrary regulatory distinctions that favor certain carriers over others.[24]

The access charge regime exemplifies the inequities in the CPNP system. For example, MetroPCS observes that Voice over Internet Protocol ("VoIP") providers do not pay access charges for long distance call termination while other carriers pay such charges.[25] In another example, interexchange carriers ("IXCs") do not pay terminating access to commercial mobile radio service ("CMRS") providers in the absence of an agreement between the CMRS carrier and IXC, while CMRS providers are required to pay terminating access charges to carriers.[26] The Commission should thus ensure that whatever intercarrier compensation reform it undertakes eradicates these arbitrary distinctions and inequities.[27]

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[23] SBC comments at 6-7.

[24] SBC comments at 7-8 (pointing out that the ARIC and CBICC proposals to have long distance carriers pay originating access to the calling party's carrier would perpetuate the distinction between local and long distance traffic). SBC notes that the ARIC plan would permit a rural carrier to pay less for termination on other carrier networks than it would charge for termination on its own network, due to the plan's allowance for different rate levels based on carriers' cost differences.

[25] MetroPCS comments at 4.

[26] MetroPCS comments at 7.

[27] For this reason, Leap particularly opposes suggestions that carriers may use tariffs for intercarrier compensation. *See, e.g.*, NECA comments at 18-20 (noting that tariffs allow flexibility in setting rates). Such a proposal would benefit terminating monopolies to the

Many carriers also point to the fact that the current regime's regulatory distinctions and inequities have created arbitrage opportunities for carriers. MetroPCS describes the current system as "creat[ing] an uneven playing field between all carriers and creat[ing] opportunities for arbitrage which serve to frustrate the development of efficient systems and cost-effective services that meet consumer needs."[28] Although some carriers argue that bill and keep creates its own set of arbitrage opportunities, Leap urges the Commission to reject such concerns. While a bill and keep system may create incentives for carriers to serve customers with a higher volume of outbound calls, this incentive does not inherently favor one particular segment or sector of the industry. In contrast, under the current CPNP system, certain carriers are placed at a disadvantage at the outset such as wireless carriers that pay access charges but cannot collect access payments. A bill and keep system eliminates this inherently inequitable treatment of technologies and services. Accordingly, there is ample support in the record for adopting bill and keep to promote the Commission's goals of competitive and technological neutrality.

C. Bill and Keep Must be Implemented Expeditiously

Given these persistent problems with the intercarrier compensation system, a number of parties have stressed the urgency for the Commission to implement intercarrier compensation reform immediately.[29] This proceeding has been pending

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detriment of other carriers. The Commission has already recognized that unilateral tariffs filed by LECs in states for termination of wireless-originated traffic is impermissible.

[28] MetroPCS comments at 4.

[29] CTIA comments at 43; Leap comments at 5; MetroPCS comments at 17; Rural Cellular

for four years without resolution and in that time, the Commission has also faced requests for clarification regarding a multitude of issues that are related to and may be resolved by reforming intercarrier compensation. These issues include among other things, the rating and routing of wireless traffic; the pricing for ILEC transit services; access charges for VoIP providers; and access charges for wireless carriers.[30] As discussed above, bill and keep best addresses and resolves these pending issues and should be implemented expeditiously, and no later than the three-year period proposed by CTIA.

As MetroPCS has noted, the Commission's failure to take action in this proceeding has been particularly detrimental for smaller carriers. Specifically, since the NPRM in this docket has been pending, carriers with limited resources have been unable or unwilling to expend the considerable amounts necessary to negotiate "forward-looking intercarrier compensation arrangements when the effort could be rendered worthless by an FCC decision implementing a different comprehensive compensation regime."[31] In addition, carriers have had limited opt-in opportunities with the Commission's elimination of "pick and choose" under Section 252(i) of the Act.

Even if the Commission adopts the CTIA proposal's three-year transition timeline, there will be a lag time in its implementation. For this reason, Leap also

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Association comments at 2; T-Mobile comments at 17; Time Warner comments at 10; US Cellular comments at 10; ICF comments at 6; Sprint comments at 23.

[30] *See* Sprint comments at 17-22.

[31] MetroPCS comments at 5.

supports MetroPCS' proposal that the Commission implement bill and keep immediately on a "flash-cut" basis for *wireline-wireless* intercarrier compensation. An immediate adoption of bill and keep for wireline-wireless calls makes sense for a number of reasons: (i) a transition for this traffic would not have major impacts on the rest of the industry; (ii) it will promote inter-modal competition and the convergence of wireless-wireline services; (iii) the continuing growth of wireless services means that the traffic balance between wireless and wireline carriers is in many cases, "roughly balanced;"[32] and (iv) wireless calls are often provided under one flat rate and not geographically segregable into "local" and "long distance" components, and therefore, are well-suited for simplified bill and keep treatment for all wireless-wireline traffic.

III. THE RECORD REFLECTS THAT THE COMMISSION SHOULD AFFIRM THE FOLLOWING INTERCONNECTION ISSUES

A. The Commission Should Reaffirm the One POI/LATA Rule

Several parties urged the Commission to affirm that carriers need only interconnect with the ILEC at one point of interconnection ("POI") per local access and transport area ("LATA").[33] Leap agrees that it is critical for the Commission, in order to advance its competition and technology-neutral goals, to re-affirm that

[32] MetroPCS comments at 17-18 (noting that this trend toward balanced traffic "will become more pronounced over time as subscribers become increasingly comfortable using their wireless telephones as their primary communications device.")

[33] *See, e.g.*, Comptel/ALTS comments at 9; KMC comments at 50; XO comments at 21; NASUCA comments at 28; Allied National Paging comments at2; Dobson Cellular comments at 3-4

carriers are not required to interconnect at more than one POI per LATA.[34] Any other requirement would impede the development of new technologies, services, and choices in providers. MetroPCS accurately highlights the fact that, absent the one POI per LATA rule, competitive and wireless carriers would have been subject to "costly and burdensome interconnection requirements" of interconnection in every local calling area.[35] Accordingly, Cricket urges the Commission to reaffirm that carriers need only interconnect with the ILEC at one POI per LATA.

Furthermore, Leap and other carriers *do not support* the interconnection rules proposed in the ICF plan, which are unduly complex and inequitable.[36] The ICF plan requires that carriers interconnect to *each* "edge" (or point of interconnection) designated by a terminating carrier, such that terminating ILECs may be able to force other carriers to interconnect at each access tandem within an ILEC's network. In addition, under the ICF plan, when a hierarchical network (such as an ILEC's network) interconnects with a non-hierarchical network (such as a wireless network), the non-hierarchical network bears the financial responsibility for delivering traffic to *and transporting traffic from* the hierarchical network's

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[34] *See* Comptel/ALTS comments at 7, noting that the Commission has already concluded that a competitive carrier may request a single POI per LATA. *See Application by SBC Communications, Inc.*, CC Docket No.00-65, Memorandum Opinion and Order, 15 FCC Rcd 18354, 18390, at para. 78 n. 174 (2000).

[35] MetroPCS comments at 19.

[36] *See also* T-Mobile comments at 19 (observing that a significant difference from the CTIA plan is the ICF Plan to require delivery of traffic to "each edge" designated by the terminating carrier).

edge.[37] Thus, the ICF plan would not be competitively neutral and instead would impose greater costs on certain networks (such as wireless) by requiring non-hierarchical networks to bear the costs of delivering traffic to and from the hierarchical network's edge.

B. The Commission Should Affirm that Carriers Have the Right to Indirect Interconnection and that ILECs Must Provide Transit Traffic Services at TELRIC

As a matter of law, carriers have the right to interconnect indirectly with each other. 47 U.S.C. Section 251(a). Although most commenters recognize this right,[38] some attempt to dispute it. NTCA, for example, asserts that the "method of interconnection whether direct or indirect under Section 251(a) is, at most, an issue to be negotiated between the interconnecting carriers" and that the Act does not require a rural ILEC to "accept indirect interconnection at any point at any discretion of the interconnecting carrier."[39] The Commission has clearly found, however, that under Section 251(a), *all telecommunications carriers* must provide indirect or direct interconnection based upon the most efficient economic and technical choices.[40] Therefore, to the extent that it is technically and economically efficient for a requesting carrier to establish indirect interconnection with an ILEC,

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[37] *See* ICF comments, Appendix D, at 10-11.

[38] *See, e.g.,* CTIA comments at 24; Nextel comments at 6 (Commission recognized the duty to interconnect indirectly or directly); Leap comments at 9-10; Comptel/ALTS comments at 10; MetroPCS comments at 21; USTA comments at 18-19 (recognizing that transit service should be provided to facilitate indirect interconnection).

[39] NTCA comments at 43-44.

[40] *See Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, FCC 96-325, CC Docket No. 96-98, First Report and Order (1996) ("First Local Competition Report and Order") at para. 997.

the ILEC must permit such indirect interconnection.

Moreover, as Leap noted and as a majority of other commenters assert, the Act obligates ILECs to provide transit services.[41] XO Communications accurately explains that transit service has been historically provided by the ILECs both before and after the 1996 Act.[42] Indeed, the Commission's Wireline Competition Bureau has recognized that ILECs have the obligation to provide transit service to CLECs.[43] As Leap noted in its comments, Section 251(c)(2) requires that the ILEC provides interconnection for the *transmission and routing* of telephone exchange service and exchange access. Consequently, given that the ILEC must provide this interconnection for the purpose of "transmission and routing," the ILEC may not shirk its duty to transmit or route traffic traveling on its network to another carrier. XO correctly observes that "[u]nless and until third party transit providers become ubiquitous, transiting through the ILEC will be the only feasible method of exchanging traffic with the vast majority of other competing carriers in a region."[44]

Moreover, because the ILEC's obligation to provide transit service flows from Sections 251(a) and 251(c)(2) of the Act, many parties argue that transit service

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[41] *See* Leap comments at 10-11; ICF comments, Appendix A22-A-23; MetroPCS comments at 21; T-Mobile comments at 21; Coalition for Capacity-Based Access Pricing comments at 28; NuVox, Inc. comments at 6; XO Communications comments at 24; Nextel comments at 5.

[42] XO comments at 24.

[43] XO comments at 25, *citing FCC Virginia Arbitration Order,* DA 02-1731, Memorandum Opinion and Order (2002) at paras. 115-20.

[44] XO comments at 25.

must be provided at cost-based rates.[45] As Leap and others note, Section 252(d)(1) of the Act provides that state commissions should establish interconnection of facilities and equipment *under Section 251(c)(2)* at cost-based rates.[46] In addition, there are numerous other bases for requiring cost-based TELRIC prices for transit service. Among other things, carriers point to Section 201 of the Act as providing basis for requiring transit to be provided at cost-based rates.[47] XO also discusses the fact that Section 51.501(a) of the Commission's rules require total element long run incremental ("TELRIC") pricing for interconnection and Section 51.701 applies TELRIC pricing to reciprocal compensation for the transport and termination of telecommunications traffic, both of which may apply to traffic delivered by an ILEC to a third party carrier.[48] Furthermore, at least with regard to wireline-wireless transit, Nextel cites Rule 51.701(b)(2) as defining the geographic scope of *local traffic* for *CMRS-ILEC* interconnection as intraMTA and therefore, TELRIC requirements for reciprocal compensation should apply to any intraMTA wireline-wireless transit traffic.[49] Finally, Leap supports Nextel's assertion that the Commission has authority to preempt state ratemaking authority under Sections

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[45] *See, e.g.*, XO comments at 26; Leap comments at 11; MetroPCS comments at 22; CTIA comments at 26-27; T-Mobile comments at 21-22; Nextel comments at 9.

[46] *See, e.g.*, XO comments at 26; Leap comments at 11.

[47] MetroPCS comments at 22; Leap comments at 11.

[48] XO comments at 26.

[49] Nextel comments at 11. Cricket also supports the comments of Nextel that the Commission should retain the intraMTA rule for purposes of reciprocal compensation obligations (especially to the extent that the Commission does not implement bill and keep for all forms of CMRS-wireline traffic). *See* Nextel comments at 30.

201, 251, and Sections 2(b) and 332 to establish cost-based rates for intrastate transit service.[50]

IV. THE RECORD SUPPORTS UNIVERSAL SERVICE REFORM BASED ON FORWARD-LOOKING COSTS

Leap joins parties[51] in opposing the comments of some rural carriers arguing for the creation of a new fund to recover lost intercarrier compensation revenue,[52] or the proposals of ILECs to ensure the maintenance of existing revenue levels, or to maintain revenue neutrality.[53] As CTIA notes, the goal of universal service reform should be to ensure that consumers have access to high quality services at affordable rates – not to ensure that ILECs are guaranteed existing revenue streams.[54]

T-Mobile cites a statistic that high-cost support has more than tripled since 1996, in part due to additional new high-cost mechanisms such as interstate access and common line support.[55] The fact that high cost support has flourished while new technologies are enabling carriers to operate more efficiently illustrates a fundamental problem with the existing universal service mechanism – which is carriers' sense of entitlement to these funds. CTIA questions the need to maintain

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[50] Nextel comments at 11-12.

[51] *See, e.g.*, Nextel comments at 19; CTIA comments at 39; Qwest comments at 17-18 (noting that universal service funding is already "higher than is reasonable and should not be increased"); XO Communications comments at 16.

[52] Eastern Rural Telecom Association comments at 2; Frontier comments at 11.

[53] *See, e.g.*, USTA comments at 34-35.

[54] CTIA comments at 32-33.

[55] T-Mobile comments at 26-27.

high cost fund support at current levels and emphasizes that current increases in the high cost support funds have been driven *not by consumer needs* but by the "perceived need to replace access charges and other intercarrier revenues with universal service support."[56]

However, Nextel indicates that, even without intercarrier compensation reform, preserving the status quo "is likely to result in the loss of interstate access revenue naturally, as the market finds less expensive alternatives, such as IP-Enabled services, to paying per minute ILEC access rates to terminate calls."[57] Accordingly, it is impractical and inefficient to maintain revenues for ILECs. As Nextel notes, there is "no evidence in the record that revenue neutrality is necessary to maintain service to the public at affordable prices."[58] Similarly, T-Mobile points out that revenue neutrality perpetuates existing inefficiencies and allows legacy networks to "receive inflated, guaranteed universal service subsidies."[59]

Instead of ensuring that carriers continue to receive an existing revenue stream (to which they are not legally entitled), universal service reform should focus on ensuring that consumers in high cost areas have access to affordable high quality services, consistent with Section 254(b). As Leap and other parties advocate, the best method of restricting support to adequate levels is to base universal service

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[56] CTIA comments at 33.

[57] Nextel comments at 20.

[58] Nextel comments at 20.

[59] T-Mobile comments at 25.

support on a least-cost forward looking methodology.[60] Basing support on least-cost forward-looking methodologies will stimulate carriers to innovate and operate efficiently and ensure competitive and technological neutrality.

Finally, universal service support should also be portable on a "technologically and competitively neutral basis."[61] Leap urges the Commission to reject concerns of certain rural ILECs that granting wireless carriers eligible telecommunications carrier ("ETC") status would increase burdens on the universal service funds.[62] Ensuring that universal service support funds are available for *all carriers*[63] is the only result consistent with competitive and technological neutrality. Finally, the record reflects that, in order to ensure that carriers are not overly burdened, the contribution base be expanded to include all interstate telecommunications providers and other providers of service, such as VoIP providers.[64]

V. CONCLUSION

For the foregoing reasons, Leap urges the Commission to adopt bill and keep as it is the only unified intercarrier compensation system that can best resolve the current inefficiencies and problems in the system, while advancing the

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[60] *See, e.g.*, CTIA comments at 38-39; T-Mobile comments at 24-33.

[61] CTIA comments at 37, 43; US Cellular comments at 12-14, 17; T-Mobile comments at 32-33.

[62] Beehive comments at 3.

[63] *See, e.g.*, CTIA comments at 37

[64] CTIA comments at 40-41; Dobson Cellular comments at 10; Montana Independent Telecommunications System comments at 16-17; T-Mobile comments at 35.

Commission's goals for reform. Leap and other parties have further illustrated that the Commission must reaffirm its one POI/LATA rule; the right of requesting carriers to obtain indirect interconnection; and the obligation of ILECs to provide transiting services at cost-based rates. Finally, the Commission must undertake universal service reform on a competitively and technologically neutral basis and base it on a least-cost forwarding looking methodology.

Respectfully submitted this 20th day of July 2005,

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