



**T-Mobile USA, Inc.
Phantom Traffic
Presentation to Wireline
Competition Bureau
March 14, 2006**



Phantom Traffic Issues

- T-Mobile conditionally supports the USTelecom/BellSouth and Midsize Carrier proposals, with modifications.
- T-Mobile opposes any improper expansion of the *T-Mobile Order*, including authorization for CLECs to request that wireless providers negotiate interconnection agreements.
- Configuration of wireless calls illustrates T-Mobile's concerns with certain proposals.



The Phantom Traffic Issue Is Only A Symptom Of The Fundamental Flaws Of The Existing Intercarrier Compensation Regime.

- The phantom traffic issue arises from the current patchwork of rates based on irrelevant and arbitrary distinctions among different categories of calls.
- Implementation of a bill-and-keep mechanism, or, as a second-best alternative, unified intercarrier compensation rates, best resolves the issue.
- T-Mobile agrees with Verizon and XO that phantom traffic problems can best be addressed through contract negotiations, rather than new regulations. The Commission should not impose a phantom traffic remedy that requires unnecessary investment.
- Until a unitary intercarrier compensation regime is implemented, RLECs must continue to be required to follow the well-established rule that all intra-MTA wireless traffic is local.



T-Mobile Supports Aspects Of The USTelecom/BellSouth And Midsize Carrier Proposals, With Conditions.

- The technical inability of terminating RLECs to receive or transmit telephone number information using SS7 and their failures to negotiate traffic exchange arrangements with wireless carriers are significant parts of the problem.
 - The Midsize Carriers properly acknowledge a technical infeasibility exception to proposed rules, but proposed procedures to qualify for the exception are too onerous.
 - Many RLECs have failed to use their authority under the *T-Mobile Order* to request wireless carriers to negotiate traffic exchange agreements incorporating jurisdictional traffic allocation factors.
- All phantom traffic rules must apply in both directions (*i.e.*, to originating RLECs as well).
- With these caveats, T-Mobile can support certain aspects of the USTelecom/BellSouth and Midsize Carrier proposals, with modifications.



- The originating carrier should always transmit: (a) the CPN, if using SS7 (or the CN when appropriate); or (b) the ANI, if using MF signaling.
- T-Mobile supports the *voluntary*, not mandatory, population of the JIP, which the Midsize Carriers concede is not necessarily determinative of call jurisdiction.
- All intermediate carriers should be required to forward all call origination information received from prior carriers in the chain, modifying it only as required by industry practice.
- Tandem transit providers should always provide “EMI” (or terminating access) records to terminating carriers, without the need for a written request.
- The “N-1” carrier should route interconnected calls according to the LERG, with the clarification that the routing and rating points for any wireless call may be different. RLEC improper routing of intra-MTA calls to IXCs creates phantom traffic for terminating wireless carriers.
- No new enforcement mechanisms are necessary. Parties must not block calls they regard as phantom traffic or use other “self-help” remedies.



The *T-Mobile Order* Should Be Clarified But Not Improperly Expanded

- The Commission should promptly resolve all petitions to clarify or reconsider the *T-Mobile Order*.
- T-Mobile opposes any expansion of wireless carriers' obligations to negotiate traffic exchange agreements to benefit carriers other than ILECs, including the Qwest and BellSouth requests to provide all carriers the ability to require any other carrier to negotiate traffic exchange arrangements.
- The Commission should reject, as untimely and unjustified, Globalcom's and Xspedius' requests to modify the *T-Mobile Order* to grant CLECs authorization to request interconnection from wireless providers under Section 252.
- Because CLECs and wireless providers are in general parity in terms of their existing interconnection rights and reciprocal compensation obligations, there is no need for an additional layer of regulation.



**Critical Differences Between
Wireline And Wireless
Networks Demonstrate Flaws
In Some Phantom Traffic
Proposals.**

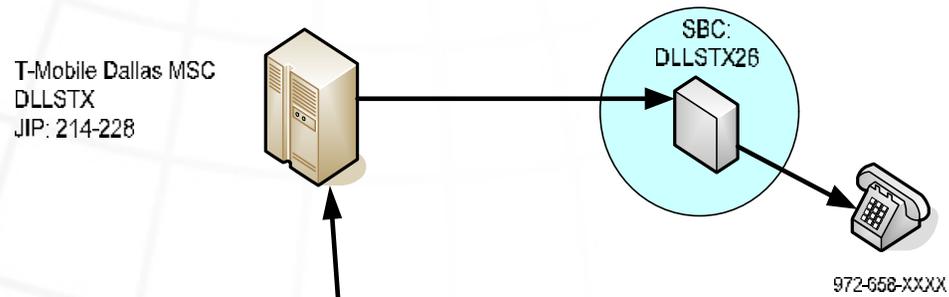


**Little Rock, AR Originated Mobile Phone Call to Dallas, TX Landline
(Mobile InterMTA call subject to Interstate Access)**

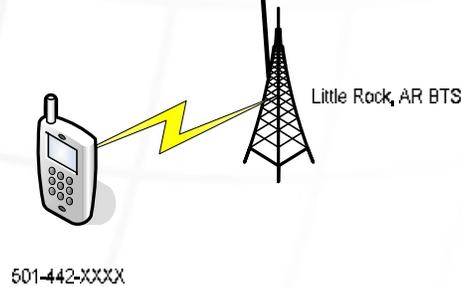
CPN/CN (501-442 to 972-658): InterMTA – Interstate Access

JIP (214-228 to 972-658): IntraMTA – Reciprocal Compensation

MTA 7

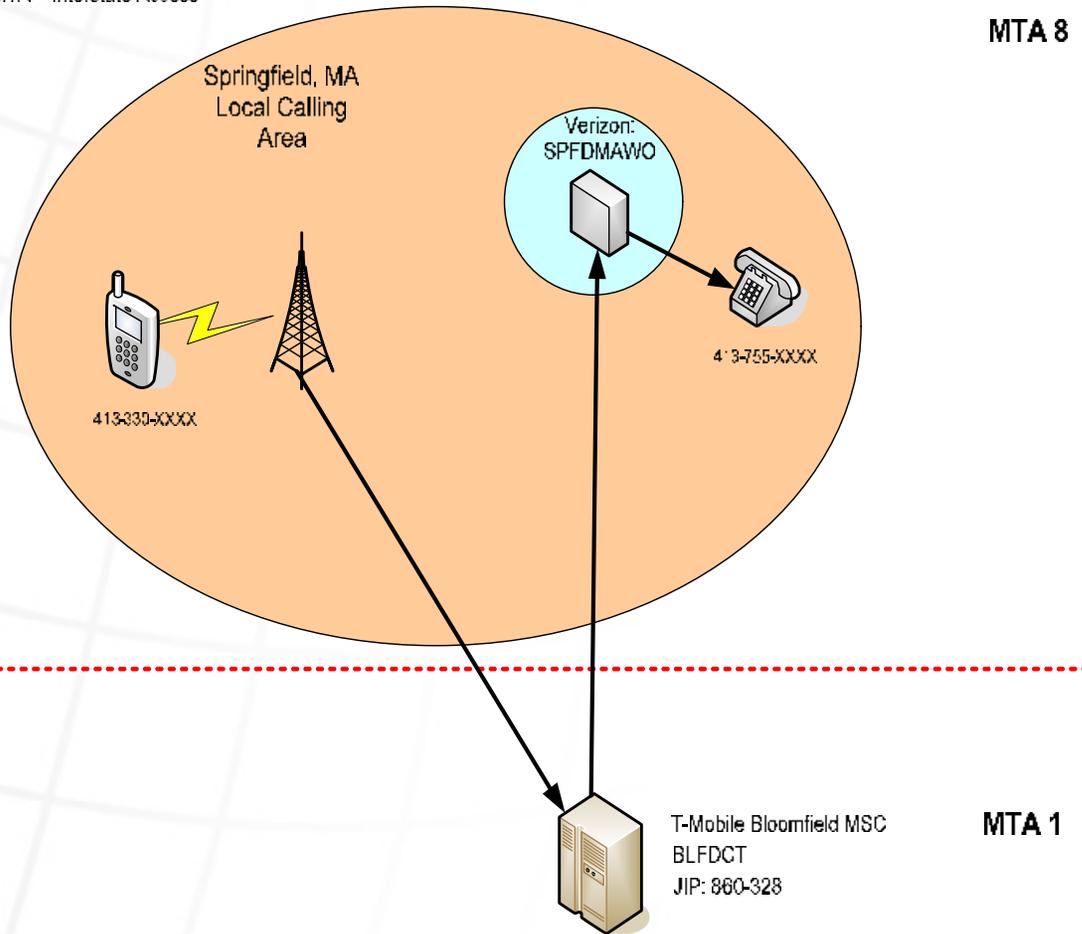


MTA 40



**Springfield Originated Mobile Phone Call to Springfield Landline
(Mobile IntraMTA Call subject to Reciprocal Compensation)**

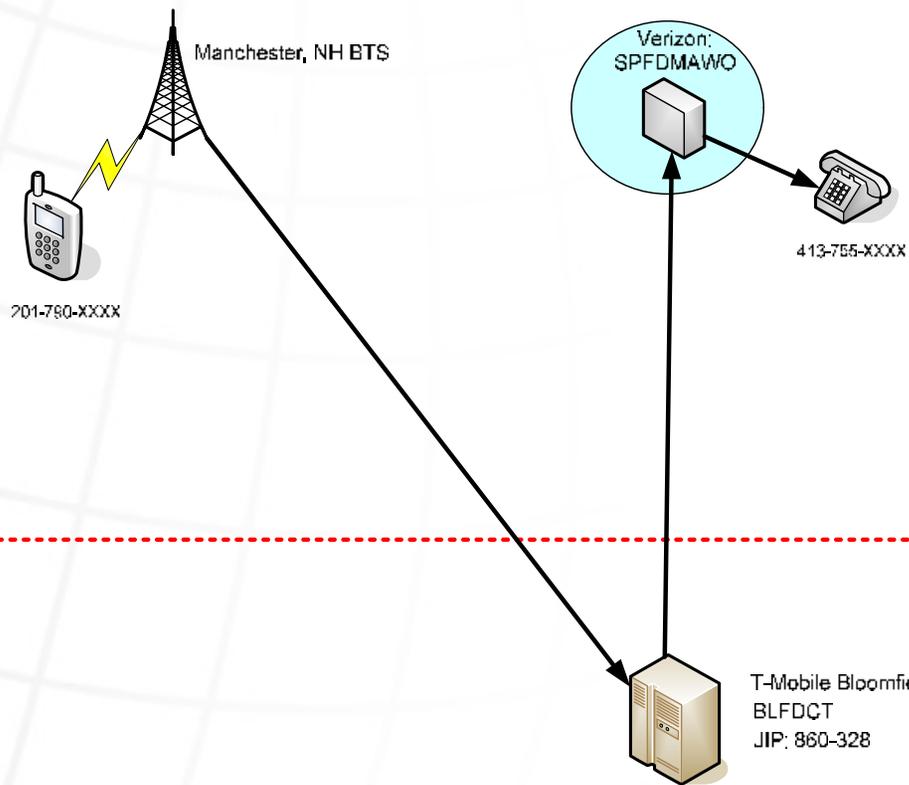
CPN/CN (413-330 to 413-775): IntraMTA – Reciprocal Compensation
JIP (860-328 to 413-755): InterMTA – Interstate Access



**Springfield Originated Mobile Phone Call to Springfield Landline
(Mobile IntraMTA Call subject to Reciprocal Compensation)**

CPN/CN (201-790 to 413-775): InterMTA – Interstate Access
JIP (860-328 to 413-755): InterMTA – Interstate Access

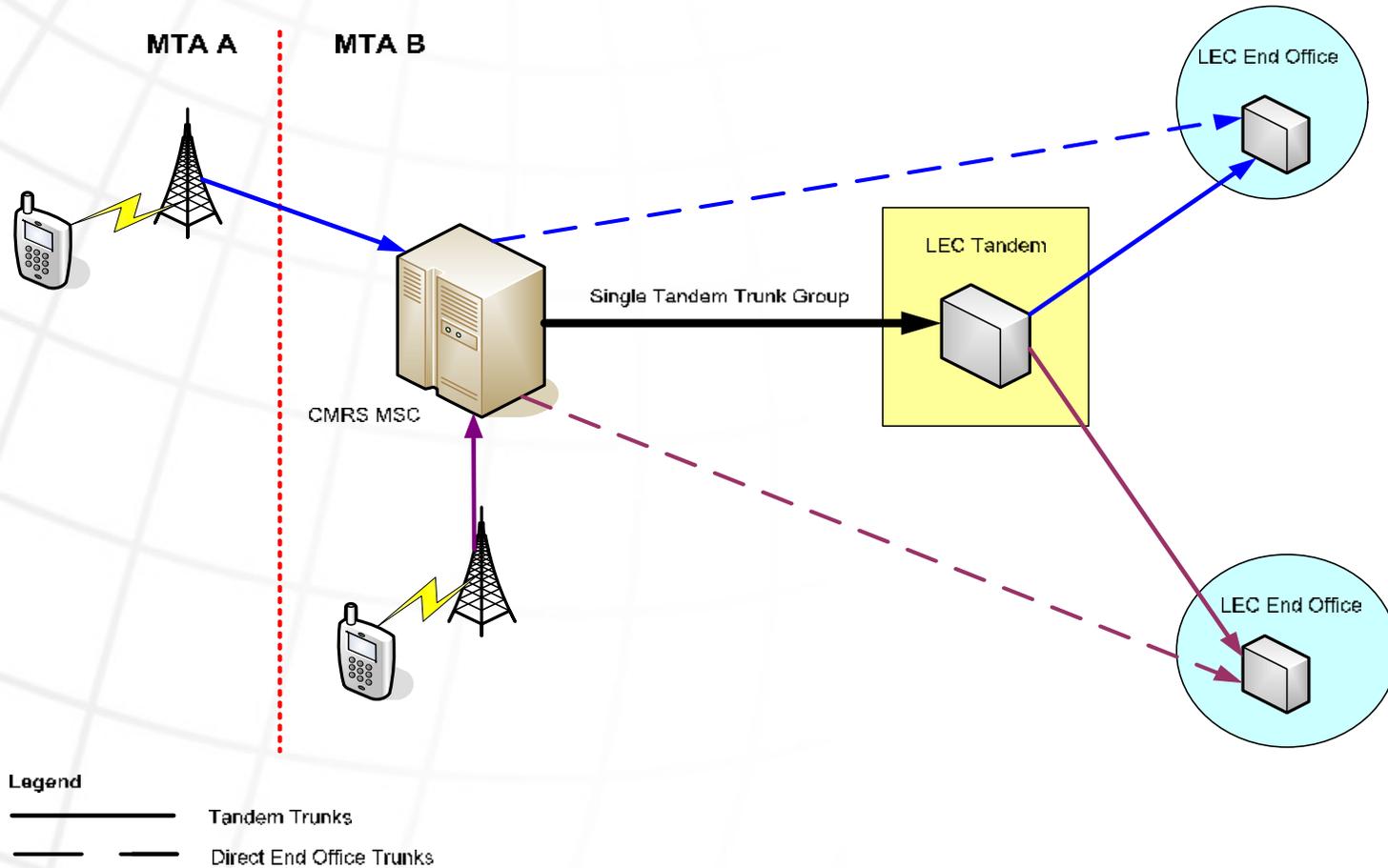
MTA 8



MTA 1



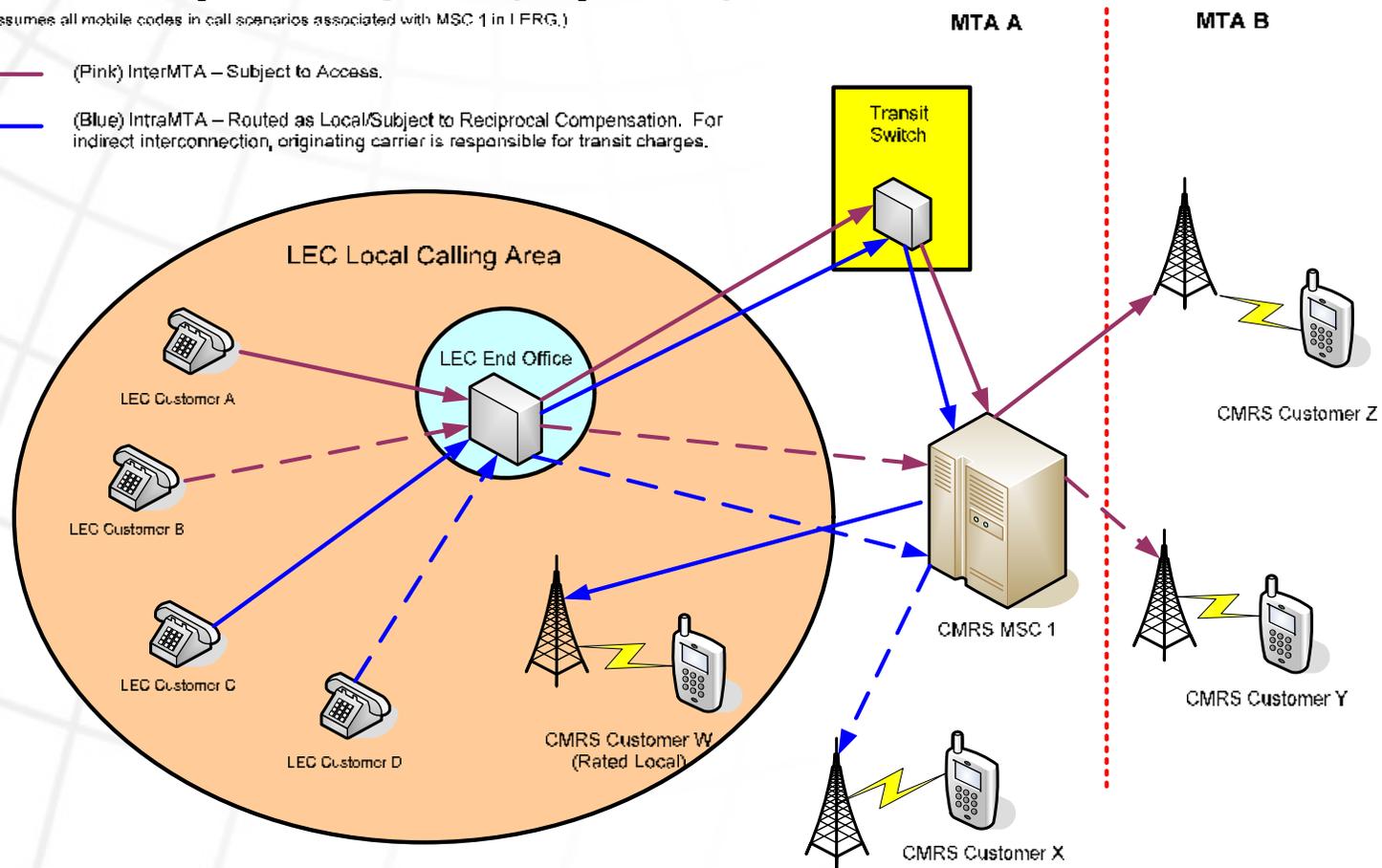
LERG Routing – CMRS Originated (Single Tandem Architecture)



LERG Routing – LEC Originated (Single LATA)

(Assumes all mobile codes in call scenarios associated with MSC 1 in I FRG.)

- (Pink) InterMTA – Subject to Access.
- (Blue) IntraMTA – Routed as Local/Subject to Reciprocal Compensation. For indirect interconnection, originating carrier is responsible for transit charges.





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The logo features a large, bold, magenta letter 'T' with a small square on its left and right sides. To its right are three small squares, followed by the word 'Mobile' in a grey serif font with a registered trademark symbol. Below this is the tagline 'Get more from life' in a grey sans-serif font with a registered trademark symbol. The background consists of a light grey grid pattern on a white background, with a grey horizontal bar at the top and a grey horizontal bar at the bottom. The bottom right corner of the grey bar contains a small photograph of three smiling people.