

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Special Access Rates for Price Cap Local Exchange Carriers)	WC Docket No. 05-25
)	
AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services)	RM-10593
)	
TO: The Federal Communications Commission		

**REPLY COMMENTS OF PCIA – THE WIRELESS INFRASTRUCTURE
ASSOCIATION**

PCIA – The Wireless Infrastructure Association (“PCIA”), by its attorneys, submits these Reply Comments in response to the Commission’s request for interested parties to update the record in the above captioned proceeding.¹ The regulatory framework applicable to interstate special access services is an important issue to the wireless communications industry as indicated by many of the comments submitted in this proceeding, and PCIA welcomes the opportunity to share its views on this issue.

I. Background

In the *Special Access NPRM*, the Commission commenced an inquiry regarding the appropriate regulatory framework to apply to price cap local exchange carriers’ interstate special access services. The inquiry included an examination of whether the Commission’s previously adopted special access pricing flexibility rules have worked as intended. The Commission

¹ See Parties Asked to Refresh the Record in the Special Access Notice of Proposed Rulemaking, *Public Notice*, FCC 07-123 (rel. July 9, 2007) (“*Public Notice*”); see also Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, *Order and Notice of Proposed Rulemaking*, 20 FCC Rcd 1994 (2005) (“*Special Access NPRM*”).

received a number of comments in response to the *Special Access NPRM*. According to the *Public Notice*, however, since the time previous comments were submitted a number of recent marketplace changes may have implications for the issues raised in the *Special Access NPRM*. As a result, the Commission requested parties to refresh the record in this proceeding.

II. Reply Comments

PCIA – The Wireless Infrastructure Association is a national trade association that represents companies that develop, own, manage and operate more than 111,000 towers, commercial rooftops and other facilities for the provision of all types of wireless, broadcasting and telecommunications services. PCIA’s member companies provide the infrastructure that enables wireless communications for consumers, business and government use.

Already remarkable, the importance of wireless communications to U.S. consumers continues to grow each year. According to the Commission, at the end of June 2006, there were approximately 217.4 million wireless telephony subscribers in the U.S. -- a 25.4 million, or 13%, increase over the prior year.² Indeed, Commission data recently reflected that there are more mobile wireless subscribers in the U.S. than the total combined number of ILEC and CLEC switched access lines.³ As the number of wireless subscribers has increased, so too has the amount of time spent communicating on mobile devices, with the Commission reporting that the average number of minutes of use per wireless subscriber per month rose to 740 in the second half of 2005 from 584 minutes in 2004 and 507 minutes in 2003.⁴

² See Industry Analysis and Technology Division, Wireline Competition Bureau, *Local Telephone Competition: Status as of June 30, 2006* at 3 (rel. January 31, 2007).

³ *Id.* at 1 (indicating 142.2 million ILEC switched access lines, 29.8 million CLEC switched access lines, and 217.4 million mobile wireless telephone service subscriptions).

⁴ See Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, *Eleventh Report*, 21 FCC Rcd 10947 at para. 5 (2006).

Access lines are critical to the provision of wireless services. These lines are the predominant means by which wireless service providers connect their wireless services to the network.

The primary goal of PCIA is to foster the responsible growth of wireless networks. To further that goal, access lines must be made available on a fair, nondiscriminatory, and competitive basis. PCIA supports an environment for the provision of access lines where sufficient competition exists.

Respectfully Submitted,

**PCIA – THE WIRELESS INFRASTRUCTURE
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August 15, 2007

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, 2007, the foregoing Reply Comments of PCIA – The Wireless Infrastructure Association were submitted electronically to the Federal Communications Commission and served via electronic mail upon the following:

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