T · ·Mobile·

September 4, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Communication: *Qwest, AT&T and BellSouth Petitions for Forbearance,* WC Dkt. No. 06-125; *Embarq and Frontier Petitions for Forbearance,* WD Dkt. No. 06-147, and *Special Access Rates for Price Cap Local Exchange Carriers,* WC Dkt. No. 05-25

Dear Ms. Dortch:

As a follow-up to T-Mobile USA, Inc.'s ("T-Mobile's") meetings with the Commissioners' offices last week, T-Mobile wishes to update the record with respect to its current and projected future use of special access services. Attachment A to this letter is a network diagram for a wireless network such as T-Mobile's.

As shown from right to left on Attachment A, T-Mobile uses several types of special access services to connect its cellular base stations (or cell sites) to its mobile switching centers ("MSCs") to form an integrated network to support its wireless services.

- For its "last mile" connections from cellular base stations (or cell sites) to ILEC end (or central) offices (the link labeled CT on Attachment A), T-Mobile typically purchases DS1 channel terminations,[1] but is increasingly beginning to purchase DS3 channel terminations for these links.
- For its transport connections between ILEC end offices and ILEC wire centers, T-Mobile routinely purchases these interoffice transport links (link IOT on Attachment A) as DS1 and/or DS3 channel mileage services,[2] but is increasingly beginning to purchase OC3 channel mileage for these links.

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1 *See* Declaration of D. Mayo at ¶5, attached to Reply Comments of T-Mobile USA, Inc., *Special Access Rates for Price Cap Local Exchange Carriers,* WC Dkt. No. 05-25 (filed Aug. 15, 2007) ("Mayo Declaration").

2 Mayo Declaration at ¶6.

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- Finally, for its entrance facilities connecting the ILEC serving wire centers ("SWC") to T-Mobile's MSCs (link EF on Attachment A), T-Mobile typically purchases OCn services (ranging from OC3s up to OC192s) for these links. Some of these OCn links utilize SONET services to create a ring configuration to increase reliability and route diversity, but T-Mobile also purchases point-to-point OCn links.

Within the next five years, T-Mobile will be continuing to deploy its wireless broadband services for end users by building out its Advanced Wireless Service ("AWS") spectrum and deploying its UMTS service and other 4G services. To support T-Mobile's wireless broadband offerings, T-Mobile anticipates that its demand for higher capacity special access services will significantly increase.

- For its "last mile" connections (link CT on Attachment A), T-Mobile anticipates that it will require higher capacity special access services using protocols such as Ethernet to permit packetized service.
- For its transport connections (link IOT on Attachment A), T-Mobile anticipates that it will require even higher capacity pipes, such as OC12s, utilizing SONET, Ethernet and/or Multipacket Label Switching ("MPLS") service.
- For its entrance facilities (link EF on Attachment A), T-Mobile anticipates that it will move toward much larger capacity OCn services, such as OC192s (and even larger pipes, if available), again utilizing SONET, Ethernet and/or MPLS service.

It is important to note that even if competitive providers of these special access services may appear in certain high-density locations, T-Mobile has cell sites literally throughout the country, most of which are served only by ILECs. Because of the major capital expenditures required for new entrants to compete with the ILECs' embedded networks, T-Mobile believes that the ILECs will remain the dominant suppliers of the special access services it needs to deploy wireless broadband throughout the United States.

Moreover, as noted in the Mayo Declaration,[3] T-Mobile often needs to purchase its channel mileage and channel termination services together as a unified package from an ILEC in order to provide the necessary reliability. Accordingly, even competition for one link in the chain of special access services does not necessarily free T-Mobile and other customers from purchasing that particular link from the ILEC.

[3] Mayo Declaration at ¶6.

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One electronic copy of this ex parte notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

/s/ Kathleen O'Brien Ham
Kathleen O'Brien Ham
Managing Director, Federal Regulatory Affairs

Attachment
cc: Ian Dillner
John Hunter
Chris Moore
Scott Bergmann
Scott Deutchman

dc-502941

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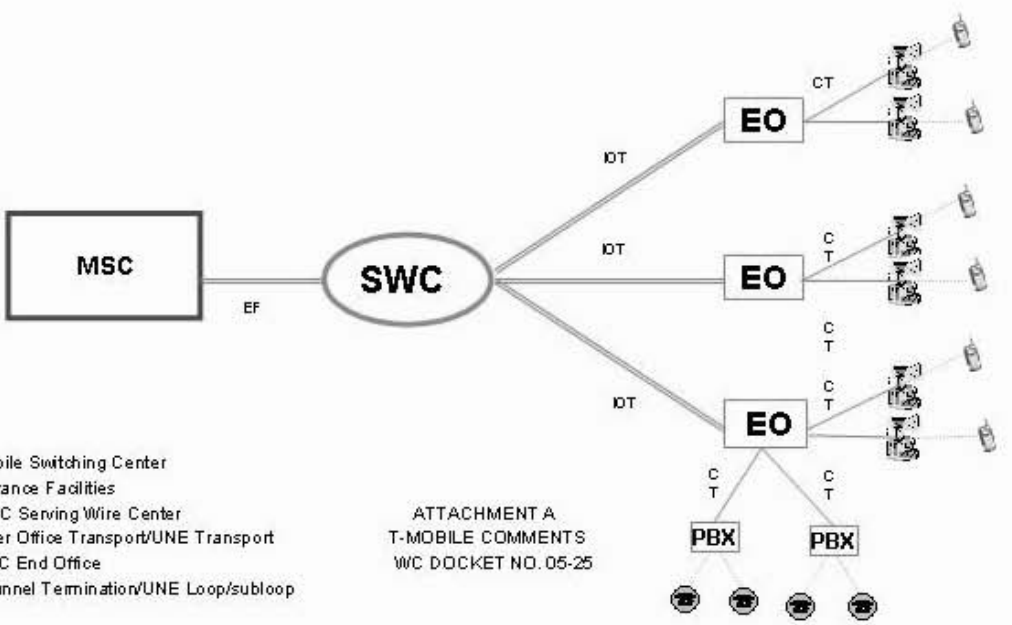
ATTACHMENT A

Schematic View of CMRS Network



MSC - Mobile Switching Center
EF - Entrance Facilities
SWC - ILEC Serving Wire Center
IOT - Inter Office Transport/UNE Transport
EO - ILEC End Office
CT - Channel Termination/UNE Loop/subloop

ATTACHMENT A
T-MOBILE COMMENTS
WC DOCKET NO. 05-25