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April 1, 2010

57739-00009

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Developing a Unified Intercarrier Compensation Regime (CC Docket No. 01-92);
Intercarrier Compensation for ISP-Bound Traffic (WC Docket No. 99-68);
Establishing Just and Reasonable Rates for Local Exchange Carriers
(WC Docket No. 07-135); Universal Service Contribution Methodology (WC Docket
No. 06-122); Federal-State Joint Board on Universal Service (CC Docket No. 96-45)

Dear Ms. Dortch:

On March 31, 2010, Mark A. Stachiw, Executive Vice President, General Counsel, and Secretary of MetroPCS Communications, Inc. (“MetroPCS”), along with Carl W. Northrop of Paul, Hastings, Janofsky & Walker LLP (“Paul Hastings”), met with Al Lewis, Doug Slotten, John Hunter, Lynne Engledow and Marcus Maher of the Wireline Competition Bureau to discuss the above-referenced proceedings. The oral presentation at the meeting was consistent with the filings made by MetroPCS in the above-referenced dockets.

Specifically, MetroPCS noted that it supports the Commission’s efforts to reform the intercarrier compensation system by adopting a unified comprehensive regime. In doing so, the Commission should take steps to assure that: (1) reforms are put in place as soon as practicable; (2) any transition period is as short as possible (*e.g.*, 5 years as opposed to 10 years); (3) safeguards are in place to assure that traffic exchanged under existing reciprocal compensation arrangements, including *de facto* bill and keep arrangements, continues to be exchanged at rates no higher than the rates in place on the date that the National Broadband Plan was adopted.

MetroPCS also advocated that the Commission move at this time to a *Report & Order* based on the extensive record that has already been compiled rather than injecting additional delay into the process by seeking further comment.

If for any reason the Commission cannot implement comprehensive reform in the near term, it should address as soon as possible the serious arbitrage problems that have been identified (*i.e.*, traffic pumping or stimulation; phantom traffic). The Commission also should consider implementing comprehensive reform with regard to wireless intercarrier compensation issues where it has plenary authority. Immediate action in the wireless

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arena is necessary because of the important role that wireless services play in the National Broadband Plan and the need for these wireless broadband services to develop under a comprehensive and unified compensation scheme.

Respectfully submitted,



Carl W. Northop
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: (via email) Al Lewis
Doug Slotten
John Hunter
Lynne Engledow
Marcus Maher