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April 6, 2010

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20554

**Re: Ex Parte Communication
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**

Dear Ms. Dortch:

Today, Norina Moy and I of Sprint Nextel Corporation, and Paul Margie of Wiltshire & Grannis, LLP, Sprint's outside counsel, met with Ruth Milkman, Jim Schlichting, Paul Murray, Joseph Levin, Peter Trachtenberg, Paul de Sa, and Nicholas Alexander of the FCC to discuss the role of special access for wireless networks, including the use of DS_n, fiber, cable, and microwave facilities to provide backhaul from cell sites. A copy of the presentation made by Sprint is attached. Sprint's discussion was consistent with its filed comments in the above-captioned proceedings.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433.3786.

Sincerely,

/s/ Charles W. McKee
Charles W. McKee

Ms. Marlene H. Dortch, Secretary

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cc: Ruth Milkman
Jim Schlichting
Paul Murray
Joseph Levin
Peter Trachtenberg
Paul de Sa
Nicholas Alexander



The Role of Special Access for Wireless Networks

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Special Challenges for Wireless Networks

Cell tower siting must be based on factors unrelated to availability of competitive backhaul facilities

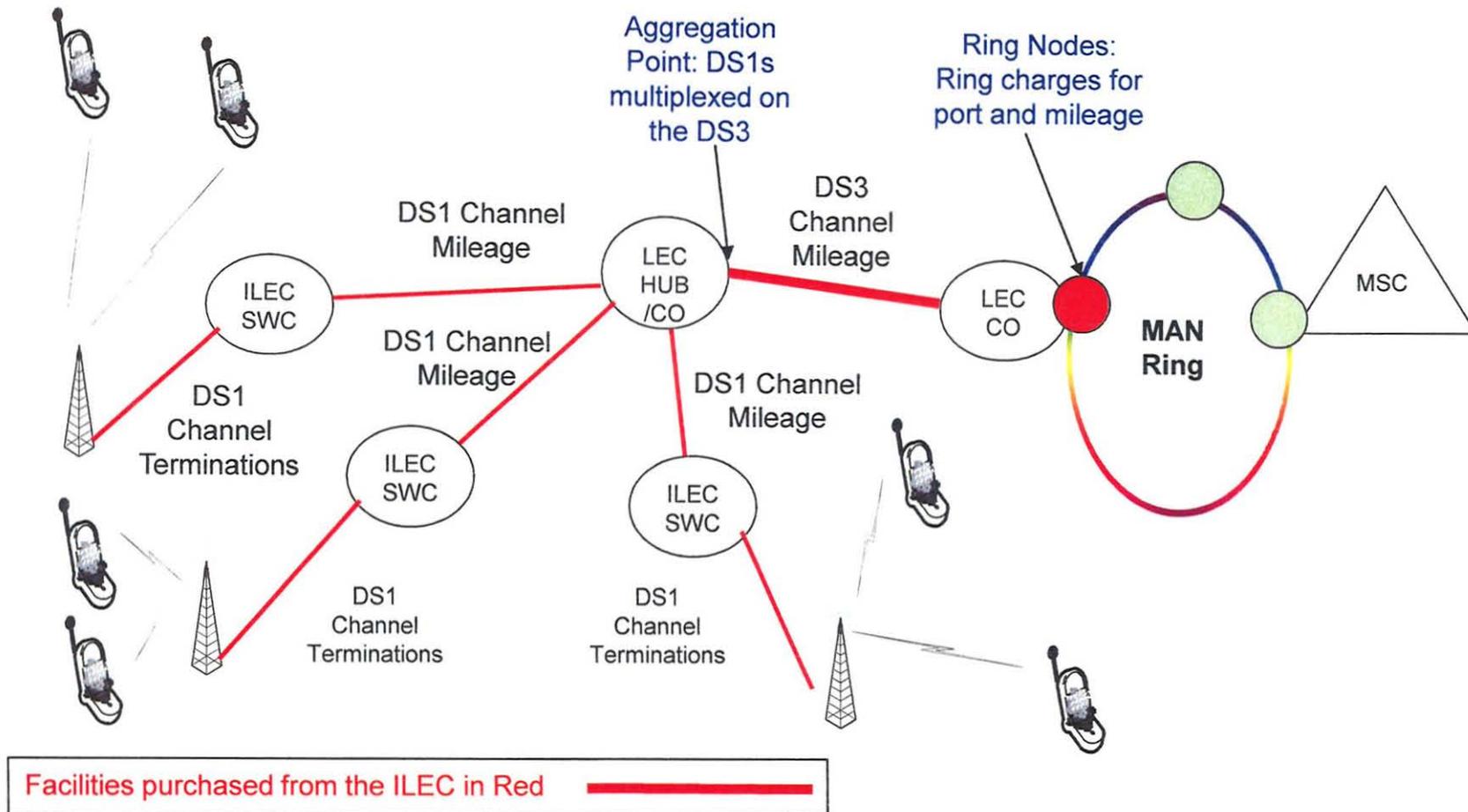
- Radio propagation considerations*
- Need to ensure coverage in entire footprint (not just urban areas)*
- Local zoning and historic preservation regulations*

Wireless carriers currently not allowed to purchase UNEs

Individual cell tower backhaul capacity requirements are fairly modest

- It is rarely economic for a competitive access vendor to construct one or two DS1 circuits to serve a single location*
- Sprint averages fewer than 3 DS1s per cell site; traffic from different technology platforms (iDEN, CDMA 1xRTT, CDMA EvDO) generally is carried over individual DS1 trunks*
- Fewer than .09% of Sprint's cell sites uses a DS3 for backhaul*
- Traffic aggregation occurs deeper into the network (traffic from multiple serving wire centers is mux'ed at the LEC hub/central office)*

Standard Wireless Network Diagram



Role of Microwave/Wireless Backhaul

Microwave backhaul cannot completely replace wireline special access services

- Not available at all cell sites (Sprint alone has tens of thousands of cell sites)*
- Microwave backhaul service not always topologically feasible*
- Economic to deploy only at certain traffic volumes*
- In addition to paying recurring charges to the backhaul service provider, the backhaul customer must deploy certain hardware and software in its network (costly, time consuming to deploy) in order to accommodate microwave backhaul*