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August 5, 2010

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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 August 4, 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 Lynne Engledow, Scott Brantner, Al Lewis, John Hunter, Randy Clarke and Doug Slotten of the Pricing Policy Division to discuss the above-referenced proceedings. The oral presentation at the meeting elaborated on 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 regime. In doing so, the Commission should choose a course that will allow the necessary comprehensive reforms to be put in place as soon as practicable. While it may be that some discrete aspects of the intercarrier compensation regime can be addressed separately (*e.g.*, phantom traffic and traffic pumping) before comprehensive reform is implemented, the Commission should only proceed in that fashion if: (i) the issue is material and could be handled without impacting other intercarrier compensation issues; and (ii) doing so will not undermine the prospects for comprehensive reform. For example, if the time would be taken to resolve these issues separately is likely to delay comprehensive reform, or if the remedies involved in these discrete proceedings will have a spill over effect on the comprehensive regime, the Commission should await comprehensive reform.

With specific reference to traffic pumping, MetroPCS noted that, while in the past it did not appear to be affected to a great extent by long distance interstate access traffic pumping, that situation has changed. MetroPCS now finds that a very small number of CLECs, most located in the Midwest, are generating a grossly disproportionate amount of long distance charges for MetroPCS. Investigation has revealed that these carriers are

Marlene H. Dortch  
August 5, 2010  
Page 2

running chat line and conference calling services that are generating inordinate amounts of inbound traffic. Thus, MetroPCS is now being victimized by traffic pumping in both the local reciprocal compensation and the long distance interstate markets. Whether done in the context of comprehensive reform or separately, steps need to be taken to address these apparent arbitrage situations. The best approach in the view of MetroPCS is to impose a bill and keep regime on grossly imbalanced traffic.

Respectfully submitted,



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

cc: (via email) Lynne Engledow  
Scott Brantner  
Al Lewis  
John Hunter  
Randy Clarke  
Doug Slotten