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May 5, 2011

57739.00027

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

Re: WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC  
Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45 and WC  
Docket No. 03-109; Oral *Ex Parte* Communication

Dear Ms. Dortch:

On May 4, 2011, Mark A. Stachiw, Executive Vice President, General Counsel and Secretary of MetroPCS Communications, Inc. (“MetroPCS”) and Carl W. Northrop of Paul, Hastings, Janofsky & Walker LLP (“Paul Hastings”) met with Albert Lewis, John Hunter, Douglas Sloten and Jennifer Prime of the Wireline Competition Bureau and Peter Trachtenberg of the Wireless Telecommunications Bureau to discuss above-captioned proceeding.

The principal purpose of the meeting was to discuss the issues raised in Section XV of the *Notice of Proposed Rulemaking* (the “NPRM”) released in the above-captioned proceeding on February 9, 2011, though MetroPCS did touch briefly on the remaining issues raised in the NPRM. The oral presentation was consistent with the written comments of MetroPCS filed in the docket on April 1, 2011 and April 18, 2011. All participants agreed in advance that the discussion would be limited to the open issues raised in the rulemaking proceeding and not the merits of any particular intercarrier compensation-related adjudicatory proceeding.

MetroPCS indicated in the meeting that it favors comprehensive intercarrier compensation reform that will address the anomalies in the current system (*e.g.*, the fact that wireless carriers pay but do not receive interstate access) and move toward a more uniform compensation regime. If comprehensive reform is not achievable in the near term, MetroPCS urged the Commission to proceed to address separately the traffic stimulation issues raised in Section XV of the NPRM. In this regard, MetroPCS advocated the imposition of a bill-and-keep regime, or a rate cap of \$0.0007 per MOU, for traffic that is imbalanced by a ratio of 3 to 1 or greater. MetroPCS indicated that an objective test of this nature would be preferable to a rule that requires a determination of the existence or nature of a revenue sharing arrangement as a mechanism to curb disruptive traffic pumping or traffic stimulation activities. MetroPCS also urged the Commission to

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recognize that traffic pumping is a major and growing problem in **both** the interexchange and local reciprocal compensation markets and should be addressed in both as soon as possible. MetroPCS noted that comments of certain state regulatory agencies in the docket support the view that a federal solution, rather than a state-by-state solution, is appropriate, particularly with respect to termination rates paid by wireless carriers that are best suited to a national regime.

Kindly refer any questions in connection with this letter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Carl W. Northrop', written in a cursive style.

Carl W. Northrop  
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: (via email) Albert Lewis  
John Hunter  
Douglas Slotten  
Jennifer Prime  
Peter Trachtenberg

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