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October 17, 2011

BY ELECTRONIC COMMENT FILING SYSTEM

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

Re: Developing an Unified Intercarrier Compensation Regime – 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; WC Docket No. 03-109 — Ex Parte Communication

Dear Ms. Dortch:

On October 13, 2011, Mark Stachiw, Vice Chairman, Secretary & General Counsel of MetroPCS Communications, Inc. (“MetroPCS”), along with Carl W. Northrop and Michael Lazarus of Telecommunications Law Professionals PLLC (“TLP”), met with Edward Lazarus of the Chairman’s Office to discuss the above-referenced proceedings.

During the meeting, MetroPCS noted its strong support of the Commission’s efforts to reform the intercarrier compensation system by adopting a unified regime. MetroPCS expressed its hope that the stars are finally in alignment for the Commission to reform an outdated system that has fostered diseconomic arbitrage and inefficiencies for way too long. MetroPCS urged the Commission to adopt a course that will allow the necessary comprehensive reforms to be put in place as soon as practicable. The revised system should be technology neutral, discourage arbitrage and be future proof, since history indicates that the Commission is not likely to have another near-term opportunity to change the rules it adopts here.

MetroPCS discussed its support for a regime in which the ultimate outcome leads to all traffic being exchanged under a bill-and-keep arrangement, and its hope that the transition period for such an arrangement occur as soon as possible (e.g., no longer than four years). MetroPCS also noted its support for immediate Commission action that would curb traffic pumping in both the local reciprocal compensation and interstate access markets. Such action is critical, as traffic pumping has escalated to include wide-scale fraudulent schemes. What started as a cottage industry of encouraging customers of carriers to call for access-supported services has become something much more sinister, with carriers going to surprising lengths to generate traffic.

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MetroPCS further noted that, ultimately, all communications traffic should be subject to a common framework. Until that eventuality, however, MetroPCS believes that it would be a mistake to apply the current, broken interconnection framework immediately to Voice over Internet Protocol ("VoIP") traffic. Instead, MetroPCS recommends that the Commission bring VoIP into the fold only once any transition periods end and all traffic is settled where intercarrier compensation rates eventually will end up. Any other outcome may result in inefficiencies with respect to VoIP traffic, as well as additional costs to consumers in the near-term.

Lastly, MetroPCS urged the Commission to clarify that all traffic that originates and terminates as switched voice traffic, including Commercial Mobile Radio Service ("CMRS") traffic that may include an IP component during carriage, be governed by Section 251(c) of the Communications Act of 1934, as amended (the "Act"). CMRS traffic that originates or terminates on the public switched telephone network ("PSTN") already has been recognized by the Commission to be a telecommunications and telecommunications services. These classifications should not change merely because IP protocols are used at some point during transmission of the traffic. Otherwise, carriers may be incented to use less efficient transmission methods (i.e., time division multiplexes, or TDM) solely due to regulatory classifications. The format in which the traffic is exchanged among interconnected carriers should have no impact on what traffic (or on the character of that traffic) is exchanged.

Any questions regarding this notice should be directed to the undersigned.

Sincerely,

/s/ Michael Lazarus

Michael Lazarus
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Edward Lazarus