



Competitive Carriers Association
Rural • Regional • Nationwide®

Competitive Carriers Association

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October 23, 2013

The Honorable Fred Upton
Chairman
Committee on Energy & Commerce
U.S. House of Representatives
Washington, DC 20515

The Honorable Henry Waxman
Ranking Member
Committee on Energy & Commerce
U.S. House of Representatives
Washington, DC 20515

The Honorable Greg Walden
Chairman
Subcommittee on Communications & Technology
U.S. House of Representatives
Washington, DC 20515

The Honorable Anna Eshoo
Ranking Member
Subcommittee on Communications & Technology
U.S. House of Representatives
Washington, DC 20515

Dear Chairmen Upton and Walden and Ranking Members Waxman and Eshoo:

Thank you for today's consideration of "The Evolution of Wired Communications Networks." On behalf of over 100 wireless carrier members, including providers of all sizes and serving nearly every geographic area in the country, CCA submits this letter to underscore the importance of the longstanding, technologically-neutral interconnection requirements that have been a cornerstone of U.S. telecommunications.

CCA supports efforts to facilitate the transition from time-division multiplexing (TDM) to Internet Protocol (IP) networks, but this transition to IP neither requires nor should contemplate the elimination of the important interconnection and arbitration safeguards enacted by Congress under Sections 251 and 252 of the Communications Act. As Congress and the Federal Communications Commission (FCC) consider the appropriate regulatory framework for an all IP world, it is imperative that policymakers reaffirm the vital interconnection and arbitration requirements of Sections 251 and 252 of the Act, which has been the fundamental underpinning of robust nationwide telecommunications capabilities, regardless of the technology used.

The FCC has recognized that "[b]asic interconnection regulations" have been "a central tenet of telecommunications regulatory policy for over a century," and that "[f]or competition to thrive, the principle of interconnection ... needs to be maintained." As Congress looks to the future of telecommunications and the appropriate role of regulation, a policy framework supporting technology-neutral interconnection as a core principle will allow companies of all sizes to invest and compete.

In addition to spectrum and devices, wireless carriers need access to networks and network connections to effectively compete. Some have incorrectly assumed, speculated, or inaccurately characterized that existing statutory provisions for interconnection requirements do not apply to carriers using IP technology. Policymakers should reaffirm the Communications Act's technology-neutral interconnection provisions to

provide all carriers with certainty that every carrier will have access to the required physical infrastructure to connect their networks and their customers. This certainty will provide wireless carriers with the confidence needed to invest in their networks, including bidding on spectrum in upcoming auctions and deploying infrastructure to meet consumers' insatiable demands for high-speed mobile broadband services.

We commend your efforts and focus on the important issues impacted by this ongoing network evolution, and look forward to our continued work with you to support competition throughout the industry. Please do not hesitate to contact me with any questions.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Steven K. Berry". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Steven K. Berry
President & CEO, CCA