

## COMMENTS to the Idaho Public Utilities Commission from T-Mobile:

- The bill proposes to remove the State of Idaho completely from all aspects of IP networks. These networks are complex and include both retail/consumer-facing elements and wholesale/carrier-facing elements.
- T-Mobile is not opposed to deregulation generally. Certainly, where market competition justifies it, we would support a lighter regulatory touch by the state and possibly deregulation entirely.
- We're concerned about only part of the deregulation proposal, the part applicable to wholesale markets. Wholesale telecom markets—which include such services as special access, interconnection, intercarrier compensation—remain under monopoly control.
- Competitive carriers such as T-Mobile must still do wholesale business with the legacy monopoly carriers in order to provide a full, competitive retail service. Those wholesale relationships are at risk if important regulatory protections are removed.
- To the extent the proposal would remove regulatory protections in these legacy monopoly wholesale markets, T-Mobile objects. Because wholesale markets remain under monopoly control, monopoly-type protections and regulation should remain in effect, under both federal and state law.
- We can agree to apply deregulation to retail markets only. Any current wholesale protections, under both federal and state law, should be preserved.
- The best way to preserve these protections is to draw a distinction between retail markets and wholesale markets and apply the deregulatory language only to retail. One could identify the specific elements of wholesale markets—such as special access, interconnection and intercarrier compensation, just to name a few—but in order to ensure that the proposed bill all of the wholesale elements, the language should simply apply to retail IP markets and not to wholesale IP markets.
- We're happy to draft those amendments.