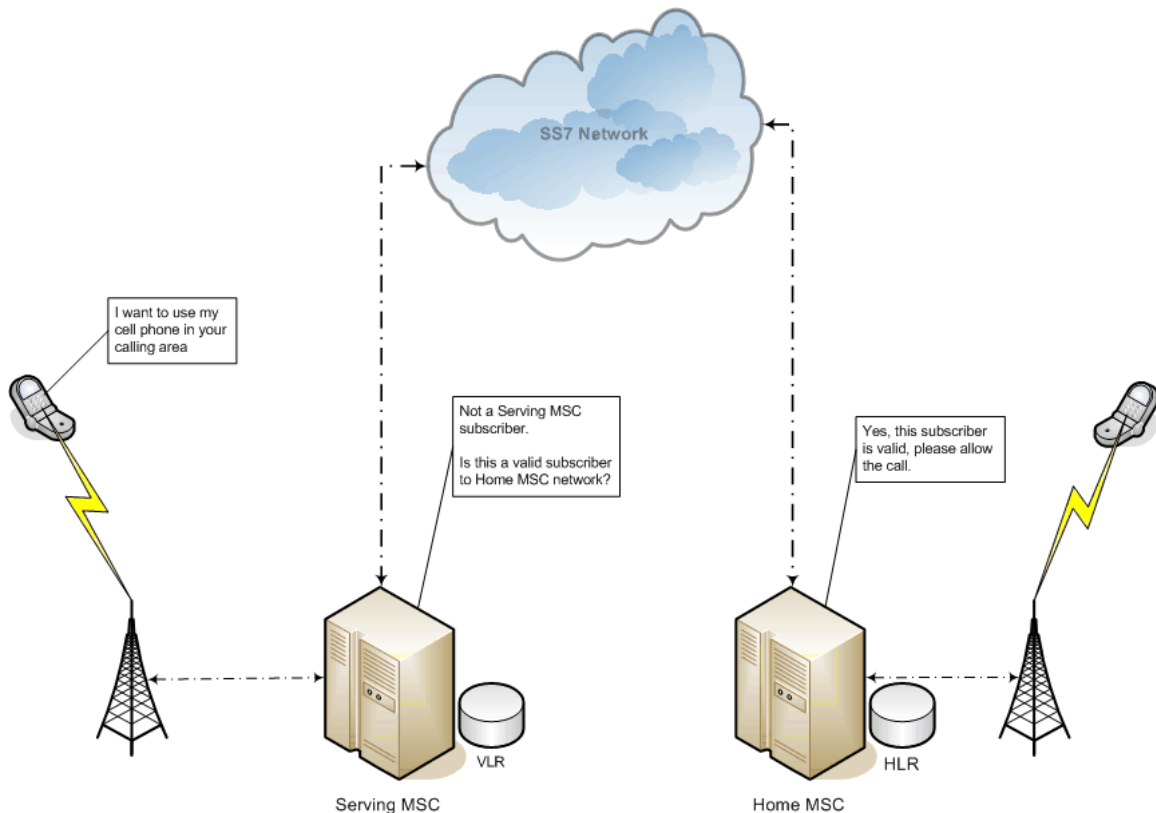




Wireless Roaming

1. Registered Roaming vs. Unregistered Roaming

Wireless subscribers “roam” when they attempt to use their phones outside of their home carrier’s wireless network and inside of the wireless network of a serving carrier. If their home carrier has entered into a roaming agreement with the serving carrier to allow the subscribers to roam, then these subscribers are considered to be “registered” (“registered roamers”). If their home carrier has **not** entered into a roaming agreement with the serving carrier to allow the subscribers to roam or the subscriber does **not** have a home carrier, then these subscribers are considered to be “unregistered” (“unregistered roamers”).



Registered roamers are as familiar to the serving carrier as its own subscribers. As a result of the roaming agreement between the home carrier and serving carrier, the serving carrier is assured payment in exchange for providing wireless service. A clearinghouse handles the wholesale billing and payment between the home and serving carriers. The home carrier handles retail billing and collection from the subscriber. Further, the registered roamer’s monthly service plan includes the home carrier’s costs associated with billing and collecting for a retail service. Unregistered roamers are “unknown” to the serving carrier. There is no assurance that the serving carrier will be paid for providing service to the unregistered roamer. In fact, serving carriers are unable to collect payment for the majority of air time provided to unregistered roamers. Unregistered roamers consume air time as they move in and out of the serving carrier’s network or attempt calls and then disconnect before providing payment.

Unregistered roamers also tend to access the serving carrier's customer care more frequently, thus increasing the serving carrier's costs. And, when an unregistered roamer does actually complete and pay for a call, the costs associated with verifying and collecting payment must be added to the retail cost of the service.

2. Federal Communications Commission Mandate

In the Matter of Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio

Services CC Docket No. 94-54, the Federal Communications Commission (FCC) stated:

We conclude that, under current market conditions, the widespread availability of roaming capability on cellular, broadband PCS and covered SMR networks promotes the public interest in nationwide, ubiquitous, and competitive telecommunications service, and that, under current market conditions, market forces alone may not always produce such a result. We therefore require cellular, broadband PCS and covered SMR licensees to provide manual ("unregistered") roaming service upon reasonable request to any subscriber to any of these services whose handset is capable of accessing their systems.

In conjunction with this Order, the FCC revised the existing "manual" roaming rule to require that all carriers provide roaming service to any wireless subscriber roaming into the carrier's service area.

Please go to www.fcc.gov - For more information or to review the complete FCC document(s)

3. American Roaming Network

By using the American Roaming Network, serving carriers can provide manual roaming service as mandated by the FCC. When an unregistered roamer enters the serving carrier's market, the switch sends the call to the American Roaming Network call processing platform. The American Roaming Network communicates with the unregistered roamer by using integrated voice response (IVR) commands to collect and validate payment. After processing the payment, the American Roaming Network sends the call back to the switch for completion. (Each market must have its own American Roaming Network call processing platform and associated IVRs.)