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August 15, 2018

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 2

Re: *Waiver Request - Porting Rules*  
*CC Docket Nos. 95-116, 99-200*

Dear Ms. Dortch:

On behalf of Inland Cellular LLC (“Inland”), this is to request a waiver of the Commission’s porting rules to the extent necessary to enable Inland to temporarily utilize a third-party Home Location Registry (“HLR”) located in a different LATA for disaster-restoration purposes, as described in the attached letter. Inland is working to resolve the issue as quickly as possible, and anticipates that it will not need the requested waiver for longer than ninety days.

Please contact me with any questions.

Sincerely,

/s/

L. Charles Keller

Attachment

cc: Ann Stevens  
Marilyn Jones  
Michelle Schlater  
William Andrie

# INLAND CELLULAR

August 14, 2018

Number Portability Administration Center  
iconectiv  
100 Somerset Corporate Blvd.  
Bridgewater, NJ 08807

To whom it may concern:

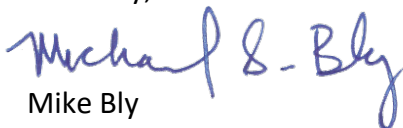
At about 4:04a on Saturday, August 11, Inland Cellular had a catastrophic network outage. There was a regional power outage which caused power spikes that knocked out all of our core networks, including voice/SMS/1xRTT data, EVDO data, and LTE data. We were able to restore EVDO and LTE data, but the VSE in our voice/SMS/1xRTT Ericsson/Nortel core was damaged and cannot yet be brought back online. We have been working around the clock with both the manufacturer and third parties to restore service, but there has yet been no resolution.

Currently, not only is our voice/SMS network inoperable, our customers are also not able to roam on partner networks since the HLR is out of commission as well. In order to give our customers voice/SMS services while we work through our network issues, we have arranged for use of a 3<sup>rd</sup> party HLR through Midwest Network Solutions Hub, LLC (MNS Hub). In order for this HLR to allow our customers to roam, we must temporarily "port" all of our subscriber's numbers out to MNS Hub so that they can route our inbound calls correctly.

Although this technically appears to be inter-LATA porting, it will not result in Inland Cellular routing voice traffic or delivering calls, it will simply allow us to alert our roaming partners that it's OK to allow our subscribers on their network. This is a crucial and temporary step to restoring service to our subscribers, and giving them the communication and public safety that they deserve.

Thank you for your understanding.

Sincerely,



Mike Bly  
Sr. VP Business Operations