

ORIGINAL

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

RECEIVED
SEP 12 1995
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of
**TELEPHONE NUMBER
PORTABILITY**

)
)
)
)
)

CC Docket No. 95-116
RM 8535

To: The Commission

DOCKET FILE COPY ORIGINAL

**JOINT COMMENTS OF AIRTOUCH PAGING AND
ARCH COMMUNICATIONS GROUP
ON THE NOTICE OF PROPOSED RULEMAKING**

**ARCH COMMUNICATIONS GROUP
AIRTOUCH PAGING**

Mark Stachiw
AirTouch Paging
Three Forest Plaza
12221 Merit Drive, Suite 800
Dallas, Texas 75251
(214) 458-5212

Carl W. Northrop
Bryan Cave LLP
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005
(202) 508-6152

September 12, 1995

No. of Copies rec'd
List ABCDE

OT 4

TABLE OF CONTENTS

Summary	ii
I. AirTouch Paging and Arch Have a Substantial Basis for Informed Comment	1
II. The Commission Can Take the Time Necessary to Implement a Well-Conceived Portability Plan	3
III. The FCC Can Take A Leading Role In Portability, But Must Accord Due Deference to the States	8
A. The States Must Play A Role	10
IV. The Commission Should Avoid Subjecting Paging Carriers to Interim Portability Measures	12
V. Near-Term Portability for Non-Geographic Telephone Numbers Is Feasible and Desirable	17
VI. Paging Providers Deserve Exchange Carrier Status In Any Long Term Number Portability Solution	19

Summary

AirTouch Paging and Arch Communications Group ("Arch") are commenting on the Notice of Proposed Rulemaking respecting telephone number portability. Generally, the comments support moving toward greater portability for wireless telephone numbers only if the Commission takes the time to implement a well-conceived, long-term solution that adequately addresses unique Commercial Mobile Radio Service issues and treats all exchange service carriers, including paging companies, fairly.

AirTouch Paging and Arch agree that the FCC must assume a leadership role if there is to be a universal portability plan that will foster efficient interstate and international telecommunications services. However, due attention must be paid to the legitimate interests of the states to avoid protracted federal/state jurisdictional issues.

AirTouch Paging and Arch strenuously oppose the imposition of "interim" portability measures on paging carriers. Such measures are wasteful of precious telephone numbers, costly and cumbersome to implement, and unnecessary in the context of a highly competitive paging industry.

AirTouch Paging and Arch endorse portability for non-geographic (900 and 500) numbers. Portability of these numbers is technically and economically feasible in the near term, and will provide valuable portable service options to customers, thereby reducing the pressure to adopt, prematurely, a universal portability plan.

As far as any long-term solution is concerned, the governing principle must be to treat paging carriers in a fashion that accords them the same treatment as other exchange carriers with respect to mutual compensation for calls they terminate.

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

RECEIVED
SEP 12 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
TELEPHONE NUMBER) CC Docket No. 95-116
PORTABILITY) RM 8535
)

To: The Commission

**JOINT COMMENTS OF AIRTOUCH PAGING AND
ARCH COMMUNICATIONS GROUP
ON THE NOTICE OF PROPOSED RULEMAKING**

AirTouch Paging^{1/} and Arch Communications Group ("Arch"), by their attorneys, hereby submit their Joint Comments on the Notice of Proposed Rulemaking (the "NPRM") adopted July 13, 1995, in the above-captioned proceeding in which the Commission is seeking comment on the prospects for number portability in today's competitive telecommunications environment.^{2/} The following is respectfully shown:

I. AirTouch Paging and Arch Have a Substantial Basis for Informed Comment

1. AirTouch Paging and Arch are substantial providers of narrowband wireless services throughout the United States.

^{1/} AirTouch Paging is a subsidiary of AirTouch Communications. These Joint Comments reflect the views of only the paging subsidiary.

^{2/} FCC 95-284, released July 13, 1995.

AirTouch Paging provides services to approximately 1,760,000 paging units from facility-based operations in 21 states. Arch provides service to approximate 1,700,000 paging units from facility-based operations in 25 states. Both carriers are rapidly building out nationwide paging systems that will greatly expand the scope of their operations.^{3/} Each of the companies also is actively involved in developing narrowband PCS networks of national scope.^{4/}

2. AirTouch Paging and Arch each has considerable knowledge regarding numbering issues at both the federal and state levels arising out of their respective paging experience. Number exhaust issues have become familiar topics of discussion in both federal and state forums. Wireless carriers, such as AirTouch Paging and Arch, have been impacted greatly by proposed methods of establishing and implementing new area codes where number shortages exist. AirTouch Paging and Arch have actively participated in various proceedings dealing with these issues. In the process, they have gained valuable experience in

^{3/} The fact that AirTouch and Arch have extensive existing operations, and are rapidly expanding into new market areas, gives them diverse experience. In some areas, they are long-established carriers now subject to competition from new entrants. In other markets, they are new entrants facing other well-entrenched carriers. Consequently, the collective experience of these companies provides great insight into the impact of number portability on the development of competitive markets.

^{4/} AirTouch holds a nationwide narrowband PCS frequency and several regional PCS authorizations. Arch is a founding shareholder in PCS Development Corp., which has authority to operate on a common narrowband PCS frequency in each of the five narrowband PCS regions in the United States.

understanding the technical and economic implications of dynamic numbering plans.

3. Based upon the foregoing considerations, AirTouch Paging and Arch have a substantial basis in experience for informed comment in this proceeding.

II. The Commission Can Take the Time Necessary to Implement a Well-Conceived Portability Plan

4. In the NPRM, the Commission tentatively concludes that the portability of telephone numbers benefits consumers of telecommunications services, and will contribute to the development of competition among alternate providers of local telephone and other telecommunications services.^{5/} In the abstract, AirTouch Paging and Arch agree with this Commission conclusion.^{6/} However, the general benefits of portability in the long term should not encourage the Commission to adopt short-term, quick-fix solutions that could end up frustrating rather than enhancing the development of a well-conceived number portability plan. Indeed, several considerations support the view that the Commission can afford to take the time to implement a number portability scheme that is well thought out and capable of surviving the test of time in a dynamic telecommunications market.

^{5/} NPRM at para. 7.

^{6/} As is discussed within, however, portability in the paging context has not proved to be essential for a competitive market to develop.

5. The Commission has recognized in multiple regulatory contexts that the paging industry is extremely competitive. This is, however, a comparatively recent phenomenon. In the late 1970s, the number of facility-based paging competitors in major markets was limited by several factors, including paging frequency scarcity and certain state regulatory schemes that accorded radio common carriers ("RCCs") regulated monopoly-type protection. Since then, the allocation of new paging channels by the FCC, and the relaxation (and ultimate preemption) of state entry requirements, have allowed virtually every market in the United States to develop to support a large number of well-financed paging competitors. This facility-based competition has resulted in declining costs of service to end users, and has dramatically increased usage.

6. The paging industry has reached this highly competitive state during a period when number portability generally has not been available. This is not because of any fundamental difference between paging customers and other telephone service customers with regard to the importance they assign to retaining a telephone number. Rather, it indicates that the benefits of competing service offerings can overcome the "inertia" that otherwise would cause a customer to stick with a prior carrier rather than switching carriers with an attendant loss of telephone number. In sum, the robust development of the paging industry establishes that segments of the telecommunications market that are highly dependent on telephone

numbers can become competitive even without number portability. This indicates that the Commission can pause to take the time necessary to fully consider the implications of a comprehensive long-term portability plan with the expectation that competition in the telecommunications industry will continue to develop in the interim even without number portability.^{2/}

7. Recent developments in the telecommunications market make the retention of one's telephone number less important than it has been in the past. The proliferation of new area codes, and the introduction of a variety of competing services over the last several years, have resulted in a significantly greater number of instances in which consumers are having to, or are electing to, change their telephone numbers. Similarly, those seeking to reach a telephone customer are getting used to the fact that the called party's number may have changed for any of a variety of reasons. As a result, the fact that a business or individual might have to change a telephone number to take advantage of a new service offering does not present as great a barrier as it did in the past to a new entrant seeking to establish a competing telecommunications service. Simply stated, the increased amount of "churn" in telephone numbers to which those placing and receiving telephone calls have

^{2/} The conclusion that the Commission should not rush headlong into adopting a universal portability solution is supported by the recent telecommunications bill passed by the Senate. This bill takes a measured approach in the near-term in which portability obligations are imposed only on LECs possessing market power. See discussion at NPRM, note 17.

become accustomed has reduced the urgency to implement a universal portability plan.

8. The availability of portable 800 (and, eventually, 888) numbers further reduces any time pressure for adopting a universal portability plan. Portable toll-free numbers provide consumers with the ability to maintain a constant telephone number even if other non-800 telephone numbers associated with the business must change.^{3/} Further flexibility will be provided if other non-geographic telephone numbers (i.e., 900 and 500 numbers) also are made portable in the near term, as is proposed by the Commission with the support of AirTouch Paging and Arch.^{2/}

9. Taking a deliberative approach to number portability also will enable the Commission to accomplish the substantial consumer education that would be required as a condition to implementing a universal portability plan. A universal portability plan could entail the disassociation of a telephone number with a specific geographic location. The consequence would be an inability of the dialing party to automatically determine whether a particular call is a "local" or "long distance" call simply by viewing the area code. This

^{3/} Notably, an increasing number of paging users, particularly those receiving wide-area or nationwide service, have demanded personal 800 numbers to permit those trying to reach them to call a toll-free number.

^{2/} See discussion, infra, at Section V. By expanding portability to include 900 and 500 numbers, the Commission will have added portable "dialing party pays" options to the "dialed party pays" option now available with the portability of 800 numbers.

aspect of portability had no specific corollary in the 800 number context. Because 800 numbers are toll free it makes no difference to the dialing party where in the country a particular number terminates. In contrast, the relocation of a POTS telephone number from one geographic area to another could have significant toll implications to the dialing party. It will take time to sort through these issues in a comprehensive fashion and to properly educate telephone customers of the results.

10. A broad-based portability plan also might require the abandonment of 7-digit dialing of "local" numbers. In a fully portable number environment, the disassociation between the area code and a specific geographic location may cause ubiquitous 10-digit dialing to become a necessity.^{10/} As was the case when 1+ dialing became necessary, a substantial period of consumer education would be required for this change to be implemented on an effective basis.^{11/}

11. In sum, AirTouch Paging and Arch believe that the adoption and implementation of a well-designed and comprehensive

^{10/} The disassociation of telephone numbers from destination addresses may have adverse implications in terms of a loss of CLASS functions. Automatic call-back/retry and follow-me roaming options also may malfunction in a mobile environment under a portability scheme.

^{11/} Considerable consumer education also proved necessary when INPAs were implemented.

number portability scheme will require time, which the Commission can afford to take.^{12/}

**III. The FCC Can Take A Leading Role
In Portability, But Must Accord
Due Deference to the States**

12. The NPRM tentatively concludes that the Commission should assume a leadership role in developing a national number portability policy, and seeks comments to determine the specific nature of this role.^{13/} AirTouch Paging and Arch agree that the FCC has a significant interest in promoting a consistent nationwide approach to number portability. However, due attention must be paid to the role to be played by state regulatory commissions to avoid intractable jurisdictional disputes.

13. Portability issues by their nature require a "big picture" focus in order for a national policy to emerge. This argues in favor of the Commission assuming a leadership role in developing portability standards. And, because the same telephone number is used to originate and terminate both intrastate and interstate services, the FCC has a legitimate, cognizable interest in telephone number portability because of its direct impact on interstate services.

^{12/} As is discussed in greater detail in Section IV within, interim measures that could actually frustrate the adoption of a workable plan should be avoided.

^{13/} NPRM at paras. 28-34.

14. Arch and AirTouch Paging also agree that deployment of vastly different number portability solutions across the country would have a significant adverse impact on the provision of interstate telecommunications services. As RCCs who have historically been subjected to both federal and state regulatory schemes, Arch and AirTouch Paging are particularly sensitive to the burdens that can be placed upon carriers when they are subject to a patchwork of inconsistent state regulations. Consequently, Arch and AirTouch Paging agree that the FCC has a legitimate interest in fostering a uniform, nationwide system of numbering.

15. There also is a substantial federal interest in fostering the development of number portability in a manner that promotes the efficient use of the numbering resource. Often, problems associated with the exhaustion of an existing area code are visited most heavily upon recent market entrants who have the greatest need for new numbering resources.^{14/} The fundamental Commission objective of fostering an efficient nationwide telecommunications system necessarily carries with it oversight authority with regard to the basic telephone number resource that lies at the heart of the network.

^{14/} Due to the dramatic growth of wireless services, CMRS carriers have been particularly vulnerable to the adverse effects of number scarcity.

A. The States Must Play A Role

16. Notwithstanding the legitimate federal interest in number portability issues, the states continue to have an important role to play in this area. First, and foremost, the Communications Act continues to accord states primary regulatory responsibility over wireline intrastate rates, classifications and service offerings.^{15/} This federal/state demarcation appears likely to survive in the telecommunications reform bill now headed to conference in the legislature.^{16/} If the FCC were to adopt too heavy-handed an approach, it will likely find itself embroiled in litigation regarding federal-state jurisdictional issues.

17. The Commission also should acknowledge that the states have relevant experience in dealing with number portability issues. The NPRM cites efforts that are underway in several states to explore various issues associated with number portability.^{17/} Given the complexity of the issues involved in fostering a seamless transition to a portable numbering system, it would be unfortunate for the FCC to take any action to discourage the states from bringing relevant experience to bear on the matters at hand.

^{15/} 47 U.S.C. §221(b).

^{16/} Both the House and Senate versions of the current telecommunications reform bill continue to accord states primary responsibility over intrastate service offerings.

^{17/} NPRM at paras. 14-16.

18. The solution proposed by AirTouch Paging and Arch is for the Commission to strike a carefully crafted balance between federal and state responsibilities over number portability issues. This will occur if the FCC adopts a number portability template that establishes the technical and administrative framework within which number portability will occur. The FCC can then accord the states responsibility for implementing number portability solutions within their borders consistent with the template.

19. For example, the FCC could conclude that the transition to portability must be affected within a particular time frame, but leave it to individual states to adopt -- within this broad guideline -- implementation schedules within their borders for subject carriers. States could regulate the administrative charges, if any, that non-CMRS carriers within their borders impose for processing requests by end users to transport numbers to new carriers.^{18/} States could be allowed to ascertain, within the context of a portability scheme generally implemented in regions conforming to state borders, whether there are individual instances in which larger or smaller number portability domains may exist. States could play a meaningful role in the portability plan in these areas, subject, of course, to the guidance of the federal template.

^{18/} State regulation of the rates of CMRS carriers has been federally preempted. 47 U.S.C. §332(C)(3)(A) (1993).

20. Finally, states could play a role in determining the proper compensation structure among and between connecting and concurring carriers involved in the delivery of an intrastate telephone call to a "portable" number. Again, however, any such state role should be subject to governing principles in which all service providers of a particular type (i.e., all exchange service providers) are treated equally in the mutual compensation process.

**IV. The Commission Should Avoid
Subjecting Paging Carriers to
Interim Portability Measures**

21. AirTouch Paging and Arch earlier observed that the Commission can afford to implement number portability over a sufficiently long period to assure that the plan finally adopted will work and can be implemented with a smooth transition.^{19/} This conclusion is reinforced once the flaws in the so-called "interim" portability measures are identified and assessed.

22. The Commission has properly recognized that available interim measures for providing number portability have significant inherent limitations.^{20/} Current interim portability solutions all are variants of network-based RCF (remote call forwarding) and its dedicated trunk-based cousin, "Flex"-DID. Each of these plans translates one network address, the "ported" number, into a second network address, the "destination number",

^{19/} See discussion, supra at Section II.

^{20/} See NPRM at paras. 55-61.

and forwards/re-directs a call through the ported number's serving switch, or a closely related tandem, to the destination number switching entity. Such arrangements could double or triple local network facility usage, double NANP number consumption, and impair both CLASS functionality and transmission quality.

23. AirTouch Paging and Arch are particularly concerned about the strain on number plan administration that would be caused by any wholesale adoption of remote call forwarding as an "interim" portability measure. The fundamental purpose of portability is to allow an end user to retain a telephone number, and thus avoid the disruption associated with the assignment of a new number. This objective is completely undermined by any interim solution that would contribute to area code exhaust. The disruptive effect of having large numbers of customers change their numbers due to the exhaustion of an area code assignment would far exceed any benefits that might occur by implementing an inefficient interim portability measure based upon RCF technology.

24. AirTouch Paging and Arch also are concerned about the administrative burdens that would be imposed on them by most interim measures. Paging is a high volume/low margin business. Significant economic strains already have been placed on paging carriers by virtue of the imposition of regulatory fees, and the requirement that they pay at auction for certain spectrum they need to continue to operate and expand their businesses. With

expenses already on the rise based upon circumstances beyond their control, paging carriers as a group can ill-afford to assume additional administrative and economic burdens associated with RCF interim portability measures.

25. The implementation of an RCF solution generally involves delivery of calls to the original terminating carrier, who then forwards the call to a new termination point. In many instances, paging carriers face technical barriers to this routing scheme since many paging terminals do not have the dial-out capability necessary to forward a call in this manner. Even if a paging carrier has installed advanced equipment capable of performing a dial-out function,^{21/} the carrier potentially would be burdened with having to utilize additional outbound trunks to be able to forward a call. The marginal benefits to end users of portability of this nature are far outweighed by the burdens imposed on the affected paging carriers.

26. Ironically, adopting interim portability measures could end up frustrating the implementation of long-term solutions rather than facilitating them. The broad scale adoption of interim portability measures will require that attention be paid to a whole host of difficult cost and revenue allocation issues.^{22/} Then, these same difficult issues would

^{21/} Some paging terminals that are integrated with voice-mail systems may have this functionality.

^{22/} For example, it is not easy to determine who should pay the substantial charges that may be associated with the remote call forwarding of a page: the end user, the original terminating carrier, the new terminating carrier, etc.

have to be revisited again in the context of a long-term portability solution. A complicated two-step approach using interim measures will prolong rather than facilitate reaching the ultimate solution.

27. AirTouch Paging and Arch also believe that there is no smooth way to transition from an interim measure to the kinds of longer-term solutions that may be necessary for universal portability to be adopted on a well-conceived basis. For this reason, the existence of an interim solution may provide an excuse to delay movement to the ultimate solution. In the long run, it would be better to take the time that is necessary to adopt and implement from the outset an optimal portability plan.

28. If, for any reason, the Commission elects to impose interim solutions on any segment of the telecommunications industry, AirTouch Paging and Arch urge the agency to exempt paging carriers from this process. Because the paging business has evolved into a highly competitive business without number portability, the Commission can safely conclude that it need not subject paging carriers to the burdens of interim portability requirements at this time. If interim solutions are to be pursued, they should be limited to those markets that have been or continue to be regulated monopolies, and where the immediate availability of a degree of portability will have the greatest potential impact on the fostering of competition.

29. One final point is extremely important for the Commission to recognize as it considers interim portability measures. In certain operating configurations, the paging carrier is properly viewed as the "customer" who holds the telephone number. For example, a paging carrier that has Type 1 interconnection is interconnected to the PSTN through another exchange service provider's end office (typically that of an LEC). This interconnection method obligates the paging carrier to make all network and number arrangements through its connecting end office company rather than directly with network administrators, and often has disqualified the paging company from access compensation and call termination payments. As a result, it is appropriate in this configuration to view the paging company as the telephone number customer. In these circumstances, the Commission should allow the paging carrier to transport these numbers from one LEC to a competitive LEC, but not require the company to implement interim measures to allow paging end users to transport these numbers to another provider.

30. In light of the foregoing considerations, AirTouch Paging and Arch strenuously urge the Commission not to impose interim portability measures on paging carriers. They are unnecessary and potentially harmful under the circumstances presented.

V. Near-Term Portability for Non-Geographic Telephone Numbers Is Feasible and Desirable

31. The Commission tentatively concludes in the NPRM that service-provider portability for 900 and 500 (PCS N00) numbers is beneficial for customers of those services.^{23/} AirTouch Paging and Arch support the Commission in this regard. The public interest would be served by mandating portability for 900 and PCS N00 services because doing so would make additional portability options available to end users. Rather than being limited to 800/888 numbers for which the called party pays, making 900 and 500 numbers portable would offer consumers options for portability with numbers for which the calling party pays.

32. However, portability for 500, 900 and 800 numbers should not be construed to require that they be capable of being converted to different services. It is neither logical nor prudent to move a nationally-recognized "toll-free" 800 (or 888) number into "toll-charged" POTS service. Only public confusion and aggravation, not convenience or competition, will result from such an interservice move. The same conclusion applies to other "number identified" services (i.e., 900 and 500 services). As long as there is portability within each service category, there would appear to be no substantial benefit from allowing portability between services.

33. AirTouch Paging and Arch support near-term portability for non-geographic 900 and 500 numbers based upon a

^{23/} NPRM at para. 69.

conclusion that a permanent, as compared to interim, portability solution for these services can be implemented relatively quickly. The Commission correctly has noted that the Industry Numbering Committee (the "INC") already has addressed PCS N00 and the portability of geographic numbers in prior workshops.^{24/} Portability of 900 service numbers also has been under discussion for some time.^{25/} There are sufficient similarities between a transition from a non-portable to portable scenario for 500 and 900, and the transition that already has been successfully completed for 800 services, to conclude that portability of 500 and 900 services in the near term is technically and economically feasible. A prompt transition will be further facilitated by the formation of the North American Numbering Council, which will select and guide a neutral North American Numbering Plan administrator, thereby satisfying certain conditions precedent to 900 and 500 service implementation that have been identified by the INC.^{26/}

34. Again, however, AirTouch Paging and Arch urge the Commission to avoid interim portability solutions for 500 and 900 services. The costs in terms of wasteful number usage and administrative burdens clearly outweigh the benefits of implementing a short-term solution. And, in implementing 500 and 900 (and 800) portability, the Commission must remain attentive

^{24/} NPRM at para. 70.

^{25/} NPRM at paras. 71-73.

^{26/} See discussion at para. 76 of the NPRM.

to determining who is viewed as the "customer". In circumstances where the paging carrier is paying another entity for a non-geographic telephone number, the paging carrier should be viewed as the customer and as the entity capable of determining where the number is terminated.

**VI. Paging Providers Deserve Exchange Carrier Status
In Any Long Term Number Portability Solution**

35. The manner in which a portability database will be administered, and how the costs of designing, building, deploying and operating the database system should be recovered, are sensitive and complex issues. In some respects, detailed discussion of these aspects of portability is premature until a specific portability plan starts to take shape. Nevertheless, there is one important concept that must be embodied in the federal policy. There is substantial logic, in an environment of portability, to treating all exchange service providers equally in the mutual compensation process. In principle, every exchange service provider who terminates traffic, particularly in a portable number environment, is entitled to compensation, in like basis and derived amount, from any other exchange service provider handing off traffic for termination, regardless of the origin of that traffic.

36. The Commission consistently and properly recognizes paging companies as providing exchange services.^{21/} The natural outcome of this classification is that paging companies should be treated equally with other exchange carriers when determinations are made regarding the allocation of costs and recoveries in the course of designing and deploying any portability scheme.

Respectfully submitted,

**AIRTOUCH PAGING
ARCH COMMUNICATIONS GROUP**

By: Carl W. Northrop
Carl W. Northrop
Their Attorney

Mark Stachiw
AirTouch Paging
Three Forest Plaza
12221 Merit Drive, Suite 800
Dallas, Texas 75251
(214) 458-5212

Carl W. Northrop
Bryan Cave LLP
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005
(202) 508-6152

September 12, 1995

118918.02

^{21/} Nevertheless, and notwithstanding pronouncements of the Commission to the contrary, certain states and LECs have taken the view that the one-way nature of paging traffic provides a basis to deny paging carrier's mutual compensation.

CERTIFICATE OF SERVICE

I, Yvette Omar, a secretary with the law firm of Bryan Cave LLP, hereby certify that a copy of the foregoing **Joint Comments of AirTouch Paging and Arch Communications Group on the Notice of Proposed Rulemaking** was hand-delivered on September 12, 1995, to the following:

Chairman Reed E. Hundt
STOP CODE 0101
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C. 20554

Commissioner James H. Quello
STOP CODE 0106
Federal Communications Commission
1919 M Street, N.W.
Room 802
Washington, D.C. 20554

Commissioner Andrew C. Barrett
STOP CODE 0103
Federal Communications Commission
1919 M Street, N.W.
Room 826
Washington, D.C. 20554

Commissioner Rachelle B. Chong
STOP CODE 0105
Federal Communications Commission
1919 M Street, N.W.
Room 844
Washington, D.C. 20554

Commissioner Susan Ness
STOP CODE 0104
Federal Communications Commission
1919 M Street, N.W.
Room 832
Washington, D.C. 20554

Kathleen M.H. Wallman, Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Room 500
Washington, D.C. 20554