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EX PARTE OR LATE FILED

March 31, 1997

EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

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Federal Communications Commission
Office of Secretary

RE: Telephone Number Portability (CC Docket No. 95-116)

Dear Mr. Caton:

On Monday, March 31, 1997, Donna Bethea and I, on behalf of AirTouch Communications, Inc. met with Donald Stockdale and Steven Teplitz of the Common Carrier Bureau to discuss the above proceeding. Please associate the attached material with the above-referenced proceeding.

Two copies of this notice are being submitted to the Secretary in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me at 202-293-4960 should you have any questions or require additional information concerning this matter.

Sincerely,

Kathleen Q. Abernathy

Attachment

cc: Donald Stockdale
Steven Teplitz

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INTERIM NUMBER PORTABILITY COSTS AND CMRS PROVIDERS

In August 1996 AirTouch filed a Petition for Reconsideration and Clarification in CC Docket 95-116.

Asked FCC, among other things, to clarify that only carriers actually participating in interim number portability should bear the costs.

Under FCC's Order in Docket 95-116, wireless carriers will not be providing number portability until six to twenty months after it is implemented by wireline carriers in the 100 largest MSAs.

CMRS providers will derive no benefit from interim number portability and therefore should not be burdened with the costs.

- Imposing costs on CMRS providers would result in an unnecessary subsidy flow to wireline carriers.

Section 251(e)(2) simply states that the costs of interim number portability be assessed on a competitively neutral basis.

- No need to assess charges on CMRS providers because we do not compete for same subscribers as wireline carriers.
- In addition, CMRS is not advantaged as compared to wireline providers if we do not contribute to interim costs because we serve different markets.

FCC Order only states that costs must be shared by all "relevant carriers using competitively neutral allocators." FCC Order at par. 131.

- CMRS providers are not relevant carriers because we are not cost causers of the service nor do we make use of the service.

Fairness dictates that carriers who do not serve or benefit from ported numbers should not be required to bear shared number portability costs.