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June 16, 1998

EX PARTE

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222 - Stop code: 1170
Washington, D.C. 20554

RECEIVED

JUN 16 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Telephone Number Portability, CC Docket No. 95-116 RM 8535; Ameritech Tariff F.C.C. No. 2, CCB/CPD 98-26; Bell Atlantic Tariff F.C.C. No. 1, CCB/CPD 98-25; Southwestern Bell Tariff F.C.C. No. 73, CCB/CPD 98-17; and Pacific Bell Tariff F.C.C. No. 128, CCB/CPD 98-23¹

Dear Ms. Salas:

On Monday, June 15, 1998, representatives of Time Warner Communications Holdings Inc. ("TWComm") met with Gail Radley-Teicher, Douglas Sicker, and Andre Rausch, all of the Network Services Division of the Common Carrier Bureau, and Lenworth Smith, Lloyd Collier, and Neil Fried, all of the Competitive Pricing Division of the Common Carrier Bureau. Representing TWComm were Don Shephard and Thomas Jones. Attached are copies of a written ex parte presentation previously filed in response to local number portability ("LNP") direct cases that describes the arguments presented by TWComm during the June 15, 1998 meeting.

¹ The four specific number portability tariff transmittal proceedings concern the following transmittals. They are: Pacific Bell tariff F.C.C. No. 128, Transmittal No. 1973, CCB/CPD 98-23; southwestern Bell Tariff F.C.C. No. 73, Transmittal No. 2694, CCB/CPD 98-17; Ameritech Tariff F.C.C. No. 2, Transmittal Nos. 1149, CCB/CPD 98-26; Bell Atlantic Tariff F.C.C. No. 73, Transmittal No. 1041, CCB/CPD 98-25.

Ms. Magalie Roman Salas
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In summary, TWComm explained that the industry has agreed that carriers shall be obligated to begin performing LNP database queries for calls made to numbers in an NXX only after one number in that NXX has been ported. Whether a carrier chooses to begin performing LNP database queries on calls to an NXX before any numbers in the NXX have been ported is left to the discretion of the carrier in question. Unfortunately, certain incumbent LECs have stated that they will begin performing queries on calls to NXXs before any numbers in those NXXs have been ported, and that the incumbent LECs plan to charge N-1 carriers who have not performed queries on such calls a default query charge.

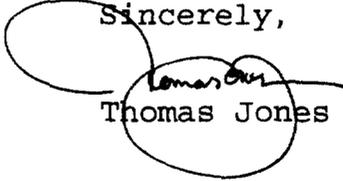
TWComm discussed three reasons why the FCC must prohibit carriers from charging for LNP database queries performed on calls to NXXs from which no number has yet been ported. First, such charges essentially eliminate the N-1 carriers' discretion (established in the industry procedures) to choose whether or not to begin querying calls to an NXX before any numbers from the NXX have been ported. Second, the fact that Ameritech has stated that it will not charge for default LNP database queries until a number is ported in an NXX indicates that such charges are unnecessary.

Third, it is not even necessary for incumbent LECs to perform default queries for calls that originate on another carrier's network to an NXX with no ported numbers. The justification offered for performing and charging for such queries is that the incumbents have so many switches serving so many NXXs that they must begin querying work early to ensure network reliability. But, as explained more fully in the attached written ex parte, the vast majority of the incumbents' LNP preparation work must be performed on end office switches. The incumbents could complete this work and perform LNP database queries launched from end office switches (and not from tandem switches) without ever performing default queries on calls originating on other carriers' networks. Any work necessary for queries to be performed by the incumbent's tandem on a particular NXX should be completed only after a number has been ported in that NXX.

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Two copies of this letter as well as the attached written ex parte will be filed in each of the above-referenced dockets. Please let me know if you have any questions.

Sincerely,



Thomas Jones

cc: Gail Radley-Teicher (five copies)
Douglas Sicker
Lloyd Collier
Leonard Smith
Andre Rausch
Neil Fried

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March 18, 1998

Ms. Magalie Roman Salas
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**FEDERAL COMMUNICATIONS COMMISSION
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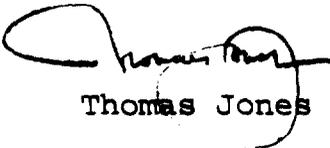
Re: Ex Parte Submission of Time Warner Communications Holdings, Inc. Regarding Number Portability Query Services, CC Docket 98-14; Ameritech Tariff F.C.C. No. 2, CCB/CPD 97-46; Bell Atlantic Tariff F.C.C. No. 1, CCB/CPD 97-52; Southwestern Bell Tariff F.C.C. No. 73, CCB/CPD 97-64; and Pacific Bell Tariff F.C.C. No. 128, CCB/CPD 97-65¹

Dear Ms. Salas:

Transmitted herewith and filed on behalf of Time Warner Communications Holdings, Inc. are two copies of an ex parte presentation filed in each of the above-referenced five proceedings.

This ex parte submission is filed in response to the rebuttal comments filed by Southwestern Bell Telephone Company and Pacific Bell, and by Bell Atlantic in support of their number portability tariffs.

Very truly yours,



Thomas Jones

Attachments

The "umbrella" proceeding, CC Docket 98-14, and the four specific number portability tariff transmittal proceedings concern the following transmittals. They are: Pacific Bell Tariff F.C.C. No. 128, Transmittal No. 1962, CCB/CPD 97-65; Southwestern Bell Tariff F.C.C. No. 73, Transmittal No. 2680, CCB/CPD 97-64; Ameritech Tariff F.C.C. No. 2, Transmittal Nos. 1123, 1130, CCB/CPD 97-46; Bell Atlantic Tariff F.C.C. No. 73, Transmittal No. 2680, CCB/CPD 97-52.

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Ex Parte Submission By Time Warner Communications Holdings Inc. In Number Portability Query Services, CC Docket No. 98-14, Investigation of Number Portability Tariff Transmittals CCB/CPD 97-65, 97-64, 97-46, 97-52.¹

Time Warner Communications Holdings Inc. ("TWComm") hereby submits this written ex parte filing in the above-referenced long-term number portability ("LNP") tariff investigations. This filing addresses the issue of default query charges and is intended to respond to the rebuttal comments filed by Southwestern Bell Telephone Company and Pacific Bell (collectively "SWBT") and Bell Atlantic in support of their number portability tariffs. In their rebuttals, SWBT and Bell Atlantic present a misleading and incomplete characterization of when carriers are required to complete query set-up work under established industry procedures and when default queries are performed under industry-adopted LNP standards. SWBT goes so far as to incorrectly accuse TWComm of submitting inaccurate and out-of-date revisions of industry procedures for LNP code opening and query set-up. In light of these unusual circumstances, TWComm hereby files this paper to set the record straight.

In its comments in response to the Direct Cases filed in this proceeding, TWComm addressed solely the question of default query charges. TWComm described the two-part process adopted by the industry for upgrading the switch and network translations to make an NXX portable. As explained in the comments, carriers are only required to perform query set-up in the second part of this process, which lasts five days and begins when the first number in an NXX ports to another carrier. Carriers may, however, choose to perform query set-up work before a number has been ported in an NXX (i.e., during the first part of the process, which lasts 45 days). TWComm argued that while incumbent LECs may complete query set-up work and begin querying calls before the second part of the upgrade process begins, they should not be permitted to impose default query charges on N-1 carriers that have chosen not to complete query set-up ahead of the industry-established deadline.

In their rebuttal comments, SWBT and Bell Atlantic argue that the large number of NXXs requested for portability by CLECs and the short time frame (five days) for completing query set-up

¹ These CCB/CPD numbers refer to specific number portability tariff transmittals as follows: Pacific Bell Tariff F.C.C. No. 128, Transmittal No. 1962, CCB/CPD 97-65; Southwestern Bell Tariff F.C.C. No. 73, Transmittal No. 2680, CCB/CPD 97-64; Ameritech Tariff F.C.C. No. 2, Transmittal Nos. 1123, 1130, CCB/CPD 97-46; Bell Atlantic Tariff F.C.C. No. 73, Transmittal No. 2680, CCB/CPD 97-52.

work after a number has been ported in an NXX effectively requires incumbent LECs to complete query set-up work before a number has been ported in an NXX. SWBT indignantly asserts that CLECs, having forced incumbents through their numerous upgrade requests to begin querying calls to NXXs before a call has been ported, cannot now refuse to pay default query charges until a number has been ported. But SWBT and Bell Atlantic offer little more than empty rhetoric in support of their position. For the reasons explained below, the Commission should prohibit carriers from charging for default queries performed on calls to an NXX before a number has been ported in the NXX.

Perhaps the most telling evidence that there is no genuine need to require N-1 carriers to pay for the disputed default query charges is that Ameritech has stated that it will not impose such charges.² Ameritech, SWBT and Bell Atlantic have the same obligation to perform query set-up work within the time frame established by the regional operation teams.³ That Ameritech sees no need to charge for default queries until a number is ported in an NXX indicates that SWBT and Bell Atlantic also need not impose such charges.

As mentioned, there is no prohibition against a carrier completing query set-up work and performing queries on calls to an NXX before a number has been ported in the NXX.⁴ The critical

² See Ameritech Reply at 14 ("Ameritech clarifies that it will only bill the Query Service rate on calls to a telephone number within a central office code (NXX) from which at least one number has been ported").

³ The LNP operation team in the Ameritech region has adopted the same time frames for implementing LNP. See Appendix A. Thus, Ameritech and SWBT are subject to the same time constraints for completing query set-up work.

⁴ See SWBT Rebuttal at 7-8. In its rebuttal, SWBT makes a clumsy attempt to discredit TWComm by asserting that Note 1 of the SW Region Code Opening Process chart attached as an appendix to TWComm's comments somehow contradicts the position taken by TWComm in its comments. But Note 1 merely states that carriers may begin query set-up work before a number in an NXX has been ported. It does not refute TWComm's position in any way because it says nothing about when carriers may charge for default queries. Strangely, SWBT further states in a footnote that TWComm omitted an important note from its filed copy of SW Region Code Opening Process chart that states that carriers may begin query set-up at any time. See *id.* at n. 10. But this appears to be exactly the note that SWBT had mistakenly interpreted as refuting TWComm's position. Indeed, if TWComm's appendix

issue is that carriers should not be permitted to charge N-1 carriers for default queries until a number has been ported in an NXX. Permitting such charges would effectively allow the incumbent to dictate to other carriers the timing of end office switch and network translation changes that the industry has agreed should be a matter of individual carrier discretion (until the first number in an NXX has been ported).⁵ It would also require many carriers to incur substantial LNP costs (i.e., per-query payments to third party SS7 vendors or default query charge payments to incumbent LECs) before such costs must be incurred for the advancement of competition. This result would be inconsistent with the FCC's precedent of requiring LNP upgrades only where the competitive market so demands.⁶ Moreover, prohibiting premature default query charges need not jeopardize the incumbent LECs' LNP cost recovery. Any costs associated with uncompensated default queries can, if absolutely necessary, be recovered in part or in whole through the mechanism established for competitively neutral recovery of other costs directly caused by LNP.

had not included the Note 1, SWBT could not have attempted to frame this (plainly incorrect) argument.

⁵ In an attempt to obscure the issue, SWBT tries to characterize its proposal that query set-up be completed within the initial 45 day period of LNP industry procedures for making NXXs portable as consistent with industry standards for opening a new NXX. See SWBT Rebuttal at 5-6. But this is simply inaccurate. Industry rules mandate that carriers complete routing translations for a new NXX within a standard 45 day period. But as SWBT itself points out, Note 1 on the SW Region Code Opening Process Chart explicitly gives each carrier the discretion to complete query set-up either during or after the 45 day period established as the first part of the process. It is only SWBT's and Bell Atlantic's insistence on charging for premature default queries that would effectively eliminate that discretion by forcing N-1 carriers to begin performing their own queries or pay the incumbent.

⁶ See Comments of TWComm at 4-5 (describing FCC policy of targeting LNP investment to areas where competition requires such investment).

⁷ SWBT is therefore incorrect that performing default queries without charge until a number is ported "would reduce query volume estimates which would drive an increase in per query costs." See SWBT Rebuttal at 12. See also Bell Atlantic Rebuttal at 3.

Furthermore it is important to recall the broader policy context in which number portability is being implemented. It is not true, as SWBT contends, that CLECs that have requested that all NXXs in a particular switch have somehow "caused" the incumbent LEC owner of those NXXs to incur the costs of number portability.⁸ The number portability system is necessary to remove the traditional association of NXXs with incumbent LEC switches. Without this reform, CLECs will never be able to compete on anything close to an equal footing for the vast majority of customers, those with telephone numbers served by incumbent LEC switches. It is this historical legacy of the local monopoly that has "caused" LNP to be implemented. SWBT and Bell Atlantic, beneficiaries of this monopoly legacy, should not be permitted to use the LNP code opening process as a vehicle for raising their rivals' costs (either by charging them for or forcing them to pay third party vendors for unnecessary default queries).

Finally, SWBT dismisses without any basis (and Bell Atlantic simply ignores) TWComm's suggested resolution of the instant dispute. In its comments, TWComm suggested that incumbent LECs perform query set-up work for all NXXs served by end office switches, but not tandem switches, before a number is ported in the NXXs in question. Since most of the switches requiring query set-up work are end offices and not tandems, this approach would allow incumbents to perform most of the necessary work at one time and before any numbers are ported in the NXXs in question. It is hard to believe that the query set-up work could not be performed on tandem switches within the five day interval required when the 1st customer in an NXX ports, as contemplated by the industry procedures.⁹

Moreover, this approach would largely eliminate the need for ILECs to perform, let alone charge for, default queries for calls to an NXX without a ported number. As explained in the attached declaration of Ms. Karen Kay, TWComm's Senior Operations Planner for LNP,¹⁰ LRN requires that a query be performed on all calls

⁸ Since CLECs enter the market to compete in a particular geographic area served by many NXXs, it is not possible to select some NXXs and not others in the area for portability. A CLEC cannot predict from which of the NXXs served by a switch its customers will come.

⁹ For example, Ameritech states that it has to upgrade switch software at 633 end offices but only 47 tandem offices. See Ameritech Reply at 11. Other incumbent LECs likely have a similar proportion of end office to tandem switches.

¹⁰ See Appendix B.

that traverse the tandem where query set-up has been completed at the tandem switch for the called NXX. However, where the query set-up work for the called NXX has not been completed at the tandem but has been completed at the end office, calls traversing the tandem to the NXX in question will only generate a query when the called number is non-working or ported. Similarly, where traffic is routed directly to end offices, a call to an NXX for which the end office query set-up work has been completed will generate a query only when the called number is non-working or ported.¹¹ In other words, if an incumbent LEC performs query set-up work on end office, but not tandem, switches before any number is ported, the only time in which the incumbent would perform a default query on a call to an NXX in which no number has been ported is where a non-working number has been called. Calls to non-working numbers represent a tiny percentage of calls and would therefore cause a very small number of queries.

In light of this explanation, SWBT's purported reasons for refusing to consider TWComm's suggested solution become flimsy indeed. SWBT states that "many carriers do not interconnect at the tandem for all of their traffic."¹² As explained, however, calls delivered directly to an end office will only result in a default query for an NXX without a ported number where a non-working number has been called. It is calls that traverse the tandem that create the problem at issue. Apparently aware of this fact, SWBT lamely falls back on the claim that calls traversing the tandem to non-working numbers still require queries.¹³ But SWBT does not mention that such calls would impose only *de minimis* query obligations on the incumbent; a small price to pay for the supposedly huge benefits of performing query set-up on all end offices before any numbers are ported.

Of course, the truth is that SWBT dismisses and Bell Atlantic ignores TWComm's solution because neither has any interest in resolving the instant dispute or in seeing LNP succeed. Indeed, it should come as no surprise that SWBT, the

¹¹ See Kay Aff. at ¶ 5; Ameritech Reply at 11 ("The LRN software requires an LNP query on all calls to portable NXXs that are routed through the tandem. However, for calls routed direct [sic] to an end office, queries need only be launched on calls to numbers (within portable NXXs) that are either non-working or ported. Hence, for the same volume of traffic, the query volume at the end office is substantially less, than will be experienced at the tandem level") (emphasis in original).

¹² See SWBT Rebuttal at 14.

¹³ See id.

only BOC to request an LNP waiver unrelated to the Perot Systems' inability to establish a reliable NPAC, has emerged as by far the most vocal proponent of unnecessary default query charges. SWBT is obviously determined to undermine LNP at every turn. The Commission should make it clear that this form of resistance will not be tolerated and prohibit SWBT, Bell Atlantic and other incumbent LECs from imposing default query charges on calls to an NXX until one number has been ported in that NXX.



Appendix A

Inter-Service Provider LNP Operations Flows

Code Opening Process Figure 9

Step	Description
1. Owners/holders of specific NPA/NXX are notified by Service Providers that which NPA/NXXs are targeted to be opened for porting.	<ul style="list-style-type: none">• Individual Service Providers identify the NPA-NXXs that they expect to port customers from.• Service Providers send a request to the holders/owners of specific NPA/NXXs that have been targeted for portability. The request must be received by the holders/owners NPA/NXXs by the 15th of the month for portability information to be included in the next LERG update.• The request recipient must respond within 5 business days upon receipt of the request. The request will contain the targeted NPA/NXXs and expected portability due date. The response shall confirm whether or not the request can be processed. If the request can not be processed, the reasons for this must be noted in the response. It's expected that all requests for NPA/NXXs in LRN capable offices will be processed. Both the request and response may be sent via postal mail, FAX, Registered Mail, E-mail, etc.• The required Global Title Translation (GTT) changes are expected to be complete within the 45 calendar days following the LERG publication. The LERG is published by the 5th business day of each month.• <i>Requests to open NPA/NXXs reflect market forecasts of Service Providers. As such, requests for code openings shall be treated as proprietary marketing information.</i>

Inter-Service Provider LNP Operations Flows

Code Opening Process Figure 9

Step	Description
<p>2. Owners/holders of NPA/NXX update or arrange for update of LERG.</p>	<ul style="list-style-type: none"> • It is assumed that the LERG will contain the universe of NPA/NXXs and only the holder/owner of an NPA/NXX or their authorized representative could update the LERG for the NPA/NXXs they hold/own. • The holder/owner of an NPA/NXX or their authorized representative must input the necessary information into the LERG database for the requested NPA/NXXs by the last day of the month in which the request was received.
<p>3. LERG is Issued. This will initiate a 45 calendar day interval within which GTTs in SS7 networks will be updated.</p>	<ul style="list-style-type: none"> • The LERG will be received by the 5th business day of the month. That LERG publication will contain the information entered prior to the last day of the previous month. When published, all changes in the LERG will be noted by annotation marking in the margins. • The issuance of the LERG will initiate the 45 calendar day interval within which GTTs will be updated for LNP and for those services that are supported by the networks and are implemented via tariffs and interconnection agreements. • SS7 Global Title Translation (GTT) changes are required to facilitate 10-digit translations. These changes, for example, direct a service provider's LNP queries (Translation Type 11) to a 10-digit translator, inter-network LIDB queries, and potentially, changes to support inter-network CLASS and Interswitch Voice-Mail Service (ISVM). The changes for CLASS affect services such as Automatic Callback and Recall, Selective Call Rejection, Calling Name Delivery, as an example. Intercompany business agreements determine whether CLASS and ISVM messaging is supported, and whether GTT changes would be made.

Inter-Service Provider LNP Operations Flows

Code Opening Process Figure 9

Step	Description
4. Owners/Holder of targeted NPA/NXXs notifies NPAC of NPA/NXXs to be opened for porting within 45 calendar days of issuance of LERG.	<ul style="list-style-type: none"> • Each service provider notifies the NPAC that specific NPA/NXX codes will be opened for portability. • The information to NPAC will be provided by either the SOA or LSMS interface uploads or by manual means. • The information must be provided to NPAC within 45 calendar days from the issuance of the LERG.
5. NPAC sends initial notification to all NPAC LSMS download recipients.	<ul style="list-style-type: none"> • The NPAC updates its internal service provider and network information. • The NPAC sends information via the LSMS interface to all NPAC LSMS download recipients indicating that specific NPA/NXXs are scheduled to be opened for porting. This is provided as advance notice.
6. GTT updates are complete for specified NPA/NXXs to be opened for porting.	<ul style="list-style-type: none"> • Service Providers and Inter-exchange carriers have completed their GTT entries in their networks for all appropriate services.
7. Using established provisioning methodology, when NPAC receives an initial subscription request for porting the first TN in an NPA/NXX, NPAC will initiate a Broadcast to all NPAC LSMS and SOA download recipients to provide Routing and Trigger updates in their switches and tandems.	<ul style="list-style-type: none"> • When the NPAC receives an initial subscription request for porting the first TN in an NPA/NXX, NPAC will initiate a broadcast "heads-up" message to all LSMSs and SOAs. • This heads-up is a final notification to all SPs that an NXX is going portable. • Upon receipt of this message, Service Providers are to open routing tables and set triggers in donor switch, LNP capable tandems and LNP capable offices in all networks within 5 business days of notification by NPAC. • The due date for subsequent ported TNs in the NPA-NXX shall not be earlier than the due date for the initial ported number.
8. Using established provisioning methodology, proceed with porting.	<ul style="list-style-type: none"> • Service providers follow normal porting processes.

Appendix B

DECLARATION OF KAREN KAY

ON BEHALF OF TIME WARNER COMMUNICATIONS HOLDINGS INC.

1. I, Karen Kay, do hereby declare as follows:
2. My name is Karen Kay. My business address is 5680 Greenwood Plaza Boulevard, Englewood, Colorado 80111. Since June 1994, I have been employed at Time Warner Communications Holdings Inc. ("TWComm") as Senior Operations Planner. In that capacity, I have worked to develop interim number portability and long-term number portability ("LNP") methods, both in-house for TWComm, and also in conjunction with other carriers at the Industry level on the Technical and Operations teams and task forces. Throughout this period I have also been responsible for translations, automatic message accounting, signaling system 7 connectivity, local exchange routing guide administration, trunking, and new product development. I have served in my current position, focusing solely on LNP issues, since 1997.
3. The purpose of this declaration is to explain the process by which default queries are made under LNP. The description provided below is based on the Industry Generic Switching and Signaling Requirements for Number Portability, Issue 1.05, dated August 1, 1997.

4. LNP Default Queries. In the LNP context, there are several contexts in which a query will be performed. First, once LNP has been implemented for a particular Central Office Code ("NXX"), there are several ways in which calls are terminated to numbers in that NXX. Calls may be transported over facilities that interconnect at the terminating local exchange carrier's tandem switch. If the query set-up has been performed for a particular NXX at the tandem switch, the tandem will automatically query for every call to that NXX, regardless of whether the called number has been ported. If the tandem has not been set-up to query for calls to the NXX, the number will be transported to the appropriate end-office and terminated to the appropriate telephone number. The terminating end-office will not perform a query unless the called number is a ported or non-working number.

5. Calls may also be transported over facilities that interconnect at the terminating local exchange carrier's end office switch. In this case, even though the query set-up work has been completed at the end office switch for the called NXX, the switch will initiate a query only if the called number is ported or non-working. In other words,

unlike calls that traverse the tandem at which the query set-up has been completed for the called NXX, calls delivered directly to an end office will not be queried if the called number is still being served by that end office switch.

3-17-1998
Date

Karen Kay
Karen Kay
Senior LNP Operations Planner

Time Warner Communications
Holdings Inc.

CERTIFICATE OF SERVICE

I, Catherine M. DeAngelis, do hereby certify that on this 18th day of March, 1998, copies of the foregoing "Ex Parte Submission" by Time Warner Communications Holdings Inc. were mailed, first class postage prepaid, unless otherwise indicated, to the following parties:

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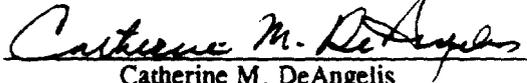
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