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CROWELL & MORING LLP

1001 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004-2595
(202) 624-2500
FACSIMILE (202) 628-5116

JOHN T. SCOTT, III
(202) 624-2582

December 3, 1998

SUITE 1200
2010 MAIN STREET
IRVINE, CALIFORNIA 92614-7217
(949) 263-8400
FACSIMILE (949) 263-8414
180 FLEET STREET
LONDON EC4A 2HD
44-171-413-0011
FACSIMILE 44-171-413-0333

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 95-116: Ex Parte Notice

Dear Ms. Salas:

On December 2, 1998, a meeting was held between Francis Malnati and the undersigned, representing Bell Atlantic Mobile ("BAM"), and Ari Fitzgerald, Legal Advisor to Chairman Kennard, to discuss the pending petition for forbearance from wireless number portability ("WNP") requirements filed by the Cellular Telecommunications Industry Association.

BAM discussed its use of numbering resources, its procedures for efficient use of NXX codes, and the differences between wireless and landline number utilization. BAM reiterated its positions on WNP as set forth in its comments on the CTIA petition. Specifically: (1) The record on the CTIA petition requires forbearance under the standards in Section 10 of the Communications Act. (2) To the extent that the Commission believes that action may be needed to address number exhaust issues, requiring WNP will not help solve those issues. (3) Denying forbearance based on assumptions as to the possible relevance of WNP to numbering issues would be an unlawful post hoc rationalization of the 1996 WNP rules.

Should there be any questions regarding this matter, please communicate with this office.

Sincerely,

John T. Scott, III

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cc: Mr. Ari Fitzgerald

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