

June 2, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street , SW
Washington, D.C. 20554

***Re: Ex Parte Presentations in FCC Docket 99-200
In the Matter of Numbering Resource Optimization***

Dear Ms. Salas:

Pursuant to Section 1.1206(b)(2) of the FCC's Rules, the California Public Utilities Commission (CPUC) and the People of the State of California submit for filing this notice of several recent ex parte communications with FCC commissioners and staff. The details of each meeting and a summary of issues discussed are listed below.

On Monday, May 22, 2000, CPUC President Loretta Lynch met with FCC Comr. Susan Ness in Comr. Ness' office at the FCC. Also present was Comr. Ness' Common Carrier Bureau Advisor, Jordan Goldstein.

On Tuesday, May 23, 2000, CPUC Pres. Lynch met with FCC Chairman William Kennard in Chairman Kennard's office at the FCC. Also present in that meeting were FCC staff Yog Varma and Charles Keller of the Common Carrier Bureau, David Furth of the Wireless Bureau as well as CPUC staff attorney Helen Mickiewicz and CPUC staff analyst Risa Hernandez.

On Wednesday, May 24, 2000, CPUC staff members Helen Mickiewicz and Risa Hernandez met with a group of FCC staff members at the FCC's offices. FCC staff members present at the meeting were Yog Varma, Charles Keller, Diane Griffin Harmon, and Cheryl Callaghan, all of the Common Carrier Bureau, as well as Blaise Scinto, David Furth, and Peter Wolfe, all of the Wireless Bureau.

On Thursday, May 25, 2000, CPUC Pres. Lynch and staff attorney Helen Mickiewicz met with Helgi Walker, Chief Legal Advisor to Comr. Furchtgott-Roth, in Comr. Furchtgott-Roth's office. In a separate meeting on that same day, CPUC Pres. Lynch and Ms. Mickiewicz met with Sarah Whitesell, Legal Advisor to Comr. Gloria Tristani, in Comr. Tristani's office. Also on May 25th, CPUC Pres. Lynch met with FCC Comr. Michael Powell in Comr. Powell's office. Finally, also on May 25th, CPUC Pres. Lynch met with FCC General Counsel Christopher Wright in Mr. Wright's office at the FCC.

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In each of these meetings, the CPUC made the following points. First, the CPUC expressed its concern that in the recent Numbering Resources Optimization (NRO) Order, the FCC decided to impose a utilization threshold only on non-pooling carriers in a pooling trial. The CPUC believes that all carriers in a pooling trial should be required to meet a utilization threshold. In addition, the CPUC noted that while the NRO Order requires states with interim pooling authority to conform their pooling trials to FCC rules by September of this year, the FCC will not have complete rules in place until next year, nor will a pooling administrator be selected until next year. The CPUC urged the FCC to consider allowing states more time to conform their pooling trials to national rules. Finally, the CPUC brought to the Commission's attention the fact that some wireline carriers in the top 100 MSAs have not deployed local number portability (LNP) technology, and consequently, cannot engage in number pooling. The CPUC urged the FCC to allow state commissions to make a "bona fide" request of those wireline carriers to have them implement LNP so that those carriers can begin pooling. The CPUC emphasized that it is not seeking the opportunity to make such requests of wireless carriers who still are working to deploy LNP by the FCC's mandated deadline of November 24, 2002.

Thank you for your assistance in making these materials part of the record. A copy of this letter is also being filed electronically with the FCC.

Sincerely,

Helen M. Mickiewicz
Senior Staff Counsel

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