



May 29, 2001

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: CC Docket Nos. 96-98; 99-200; Ex Parte Presentation

Dear Ms. Salas:

On May 16, 2001, William Hunt, vice president, public policy Level 3 Communications, Inc. and I met with the following Common Carrier Bureau personnel: Yog R. Varma, deputy bureau chief; Christopher Libertelli, legal counsel; Diane Harmon, acting division chief, Network Services Division; and Sanford Williams, attorney advisor, Network Services Division. During this meeting, we discussed technical issues relating to local number portability (LNP), Level 3's softswitch-based network, and thousands-block number pooling.

Level 3 recognizes that local number portability is an important means of promoting competition in the local exchange market and is also committed to number conservation. In order to provide numbering resources in those areas experiencing numbering exhaust, Level 3 will mark its switches as "LNP capable" in the Location Exchange Routing Guide (LERG), designate the Level 3 NPA-NXXs as "portable," and designate a Location Routing Number (LRN) in the LERG for the Level 3 switches. Level 3 will then establish an interface with the Number Portability Administration Center (NPAC). This will allow Level 3 to donate numbers into pooling trials and allow numbers to be ported into Level 3's network. In addition, the company will continue to work to resolve any remaining technical issues.

We believe that Level 3's ability to port numbers into its network and participate in number pooling is beneficial for consumers, competition, and the optimization of numbering resource usage. Moreover, proceeding in the manner described in this correspondence ensures that additional numbers will be made available to carriers in those states that are implementing number pooling.

As requested by Mr. Varma, we will follow this *ex parte* presentation with additional information regarding Level 3's network capabilities, deployment plans, and participation in state sponsored pooling trials.

Please do not hesitate to contact the undersigned if you have any questions concerning this filing.

Sincerely,

Staci L. Pies  
Director, Federal Regulatory Affairs

Cc: Yog R. Varma, Deputy Bureau Chief  
Diane Harmon, Acting Division Chief  
Christopher Libertelli, Legal Counsel  
Sanford Williams, Attorney Advisor

Level 3 Communications, Inc.

8270 Greensboro Drive, Suite 900  
[www.Level3.com](http://www.Level3.com)

McLean, VA 22102