

November 29, 2001

VIA ELECTRONIC FILING

Magalie Roman Salas
Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Notice of Ex Parte Presentation*
WT Docket No. 01-184 (WNP Forbearance Petition)
CC Docket No. 99-200 (Numbering Resource Optimization)

Dear Ms. Salas:

This is to advise you that, on November 28, 2001, John T. Scott, III, and Anne E. Hoskins of Verizon Wireless, and the undersigned on behalf of Verizon Wireless, made an ex parte presentation in the above-referenced dockets to Monica Desai, Legal Advisor to Commissioner Kevin J. Martin.

In the meeting, Verizon Wireless reiterated its position that the legal arguments and evidence on the record support the requested forbearance from the wireless number portability (WNP) requirement. In the context of this section 10 forbearance petition, the issue before the Commission is whether the continued existence of the regulation can be justified by a need to stimulate competition or protect consumers. We discussed the lack of evidence on the record to support the continuation of the regulation at this time. We observed that there is no evidence that WNP is needed to stimulate competition among wireless carriers, as such competition is already robust. We also argued that there is no evidence that WNP is necessary to spur wireless-wireline competition.

We argued that, because the forbearance standard is met at this time, forbearance should be granted. In that case, the regulation will remain “on the books” and could be revisited at any time in the future if circumstances change.

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In addition, we discussed Verizon Wireless' concern that any consideration of technology-specific area code overlays ensure efficient use of area codes and not involve number give-backs by wireless carriers. Give-backs would involve costs and inconvenience for wireless consumers on an enormous scale.

Pursuant to section 1.1206(b) of the Commission's Rules, this letter is being filed electronically in each of the above-referenced dockets. If there are any questions regarding this matter, please contact the undersigned.

Sincerely yours,

WILKINSON BARKER KNAUER, LLP

By: _____/s/
L. Charles Keller

cc: Monica Desai (via courier)