

James Hobson

From: Rockford9@aol.com

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To: jhobson@millervaneaton.com; s1300c@lvmpd.com; mark@nena9-1-1.org;
Tom.Breen@bellsouth.com; nforshee911@norcom2000.com; roger@nena9-1-1.org;
jmelcher@911.org; bragsdale@interactsys.com; richard.taylor@ncmail.net;
Bthornburg@aol.com

Cc: Rockford9@aol.com

Subject: Re: FCC and wireless number portability order

Jim and all (or etal), my request is just that FCC consider not issuing its official answer to the Verizon Wireless forbearance petition until January, giving NENA a few weeks to possibly submit some WNP information to the FCC.

I know that all the state utility commissions that have filed (and there are several) are opposed to the petition (want WNP to start 11/24/02). All the major wireless carriers that have filed have filed in support of the petition (to not do WNP at all). Sprint PCS originally filed to delay WNP but then in reply comments, supported Verizon Wireless' request. WorldCom (national wireless reseller) and Ascent (wireless reseller association) have filed, also opposed to the Verizon Wireless request.

Also, almost all the major 9-1-1 WNP issues remain with the same deadline, 11/24/02, regardless of whether WNP is postponed or dis-allowed. Wireless number pooling will occur by then for sure. The difference is the potential magnitude of some of the issues, involving 50 to 60 million phone numbers (ported/pooled combined), versus 10 to 20 million (pooled only), during the first several months.

Virtually all the issues are resolvable. However, some may require FCC action to ensure that resolution on a timely basis. And that will be much clearer, following next week's St Louis meeting--which is the first time that all of the 9-1-1 players (wireless carriers, third party vendors, 9-1-1 service providers/wireline carriers, and PSAPs) have an opportunity to debate and work the issues for a number of hours, face to face or via conference bridge.

So, summarizing, if the FCC would just hold off a few weeks prior to acting on the Verizon Wireless petition, NENA would have a chance to provide some WNP 9-1-1 information. If the St Louis meeting had been held earlier or if the FCC was taking a bit longer with the petition or if I would have had more extra time to work the issue in the past two months, I would not be bringing this up at this time. However, the 'ifs' lost, and the timing is very close.

Any more questions/comments, please let me know.

Rick Jones, ENP

NENA WNP study group chair

Loves Park (IL) 9-1-1

office 815-654-5011

fax 815-633-0555

email rockford9@aol.com