

Sent via e-mail

December 14, 2001

Michael Powell
Chairman
Federal Communications Commission
445 12th Street SW
Washington DC 20554

RE: WT Docket No. 01-184 and CC 99-200, Verizon Wireless Petition for Forbearance

The Oregon Public Utility Commission is writing this letter to ask that you deny the Verizon Wireless request for relief from the requirement to provide number portability.

Number portability is important to consumers who want to keep their phone numbers. Any move to relieve a company from providing number portability will discourage that company's customers from enjoying the advantages of a competitive marketplace if they must sacrifice their telephone numbers in order to obtain other benefits of competition such as lower rates or innovative services.

Wireless companies have successfully delayed the implementation of number portability since FCC began to require it. The technology they need to provide this service is now in place. The cost of number portability is already imposed on wireline carriers. In Oregon, a typical surcharge is \$0.43 per month, which Qwest plans to charge its customers for a period of 5 years in order to recover the start-up costs of implementation. In the future, ongoing costs of the service would be included in rates as a cost of doing business. Wireless carriers should also offer the service and bear the cost in order to ensure a fully competitive marketplace. The deadline of November 24, 2002 for wireless carriers to implement number portability should remain firm.

Roy Hemmingway
Chairman

Joan H. Smith
Commissioner

Lee Beyer
Commissioner

cc: Kathleen Q. Abernathy, FCC Commissioner
Michael J. Copps, FCC Commissioner
Kevin J. Martin, FCC Commissioner
Dorothy Attwood, Chief, Common Carrier Bureau
Jeffrey Carlisle, Senior Deputy Chief, Common Carrier Bureau
Diane Griffin Harmon, Acting Chief, Network Services Division
Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau