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January 8, 2002

**RECEIVED**

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

JAN - 8 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: In the Matter of the Commission's Rules to Ensure Compatibility with Enhanced  
911 Emergency Calling Systems  
CC Docket No. 94-102  
In the Matter of Petition Pursuant to 47 U.S.C. § 160 For Partial Forbearance  
From the Commercial Mobile Radio Services Number Portability Obligation  
WT Docket No. 01-184  
Ex Parte Meeting**

Dear Ms. Salas:

On January 7, 2002, Terry Addington, President of the Rural Cellular Association ("RCA"), John McMillan, Chairman of RCA's Government and Regulatory committee, and counsel to RCA, Sylvia Lesse and John Kuykendall of Kraskin, Lesse & Cosson, LLP, met with Jim Schlichting of the Office of the Bureau Chief, Wireless Telecommunications Bureau and Tom Navin, Dan Grosh, Jennifer Salhus and Jennifer Tomchin of the Bureau's Policy Division, to discuss the referenced matters.

RCA representatives provided an overview of the challenges faced by small and rural wireless carriers and offered experiences of their own companies. They emphasized that small and rural carriers are committed to implementing the Commission's mandates which advance public safety and national security and informed staff of some of the various challenges faced by small and rural wireless carriers as they seek to implement E911 services. The representatives reported that in states where there is no cost recovery available for carriers, network-based E911 solutions are prohibitively expensive for small and rural carriers. Even in states where cost recovery is available, it is not known how much of the carrier's costs associated with Phase II will be covered nor how long it may take for a carrier to receive reimbursement. They also reported that in many rural areas, network-based E911 Phase II technologies are not technically feasible due to system design. RCA representatives also reported that many vendors of E911 Phase II solutions do not respond to inquiries made by small and rural carriers, and that because manufacturers of handset-based solutions fill the orders of large carriers first, small and rural carriers choosing handset-based or hybrid solutions will not be able to deploy such solutions at the same time as the large carriers.

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**Ex Parte Letter**  
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RCA representatives also urged the Commission to forbear from imposing wireless local number portability. The representatives informed staff that in addition to implementing E911, small and rural carriers are diligently working to implement CALEA and TTY, which have implementation deadlines in 2002, as well as continuing to build out and improve their networks. The representatives demonstrated that the additional increased costs and administration burdens imposed by implementation of wireless local number portability would not only hinder these efforts but significantly outweigh any revenue gained from new subscribers.

Please contact me if there are any questions regarding this matter.

Sincerely yours,

  
John Kuykendall

cc: Jim Schlichting  
Tom Navin  
Dan Grosh  
Jennifer Salhus  
Jennifer Tomchin