TELEPHIA®

January 22, 2002

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket No. WT 01-184

Dear Ms. Salas:

Please accept for filing the attached ex parte comments of Telephia, Inc. in the aforementioned docket.

Sincerely,

Michael Mowery
General Counsel

101 Green Street San Francisco, CA 94111 tel: 415.395.0500 fax: 415.834.9222 www.telephia.com

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Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CMRS LNP Forbearance, Docket No. WT 01-184

Dear Ms. Salas:

Telephia is an independent research and analysis organization that focuses on market dynamics, network performance, and consumer insight information for the wireless industry. Although Telephia takes no position on the merits of the above-referenced proceeding, I am writing to clarify information attributed to Telephia that appeared in a January 16, 2002 article in the *Los Angeles Times* entitled "Carriers Aim to Kill Number Portability."

That article cited a Telephia survey for the proposition that, in December 2001, "40% of the survey customers who didn't change carriers said they mainly stayed put to keep their cell phone number." The results of our survey do not support this broad statement. Notwithstanding the implication in the article, our survey does *not* suggest that 40% of customers would switch carriers but for the inability to retain their telephone numbers. The article also suggests that the *primary* reason that these customers remain with their current carrier is an inability to retain their telephone number when switching carriers. The survey questionnaire was not designed to support or reject this specific interpretation and should not be read to support this proposition. In fact, the survey results show that there are a number of reasons that these customers stay with their current carrier. Responses to this particular survey question are most useful when interpreted in conjunction with related questions, such as satisfaction level.

The survey posed a general question about what motivates customers to remain with their current carrier. Fourteen possible answers were provided, and respondents were asked to select all answers that applied to them (see Exhibit). The survey did not ask respondents to rank the reasons they selected. Respondents included all customers in the survey who had not switched carriers within the past 12 months, including satisfied customers with no stated intent to switch carriers. Indeed, many respondents selected answers indicating satisfaction with their current carrier. It is correct to say that 40% of respondents selected "I don't want to change my current phone number" as one reason for remaining with their current carrier. Most of these respondents also selected other reasons as well.

This letter is submitted in the above-referenced docket pursuant to section 1.1206(b) of the Commission's Rules.

Sincerely,

Michael Mowery
General Counsel

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Exhibit

This question is asked of respondents who are active subscribers who have not changed carriers in the past 12 months. The order of the response choices rotate to avoid order bias.

What motivates you to remain with [INSERT CARRIER NAME FROM Q440/Q441]? *Please check all that apply.*

01 I have a contract, and don't want to pay a cancellation fee.

02 I don't want to pay start-up cost (e.g., activation fee) for signing up with a new provider.

03 It seems complicated and time-consuming to switch

04 I don't want to switch my handset/re-program my handset.

05 I don't want to change my current phone number.

06 My employer makes the decision in choosing my current service provider.

07 My family/group members don't want to switch.

08 Only my current provider offers the service features I want (e.g., push to talk).

09 My current provider offers the lowest service plan price.

10 My current provider offers the best network quality (e.g., voice quality, calling area coverage).

11 My current provider offers the best customer service.

12 My current provider offers the most convenient billing/payment options.

13 I don't want to lose some of the related features/benefits that my service provider gives.

14 I am not confident that another service provider would be better than my current one.

Other