

January 25, 2002

Via Electronic Submission

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

Re: *Notice of Ex Parte Presentation*
WT Docket No. 01-184, Verizon Wireless Petition for Forbearance of
Wireless Local Number Portability Rules

Dear Ms. Salas:

The purpose of this letter is to advise you that Glenn Rabin, Vice President Federal Regulatory Affairs of ALLTEL Communications Corp. ("ALLTEL"), Mark Rubin, Director of Federal Government Affairs for Western Wireless Corporation ("Western"), and the undersigned met today with the following Wireless Telecommunications Bureau staff: David Furth, Senior Legal Advisor, Office of the Bureau Chief; Jared Carlson, Acting Deputy Chief, Policy Division; Jennifer Salhus, Attorney, Policy Division; and Patrick Forster, Senior Engineer, Policy Division. Participants discussed Verizon Wireless's petition for forbearance of the Commission's wireless local number portability rules.

ALLTEL and Western discussed their support for Verizon Wireless's petition and permanent forbearance, reiterating points made in their and other carriers' filings already submitted in the docket. ALLTEL and Western reaffirmed their commitment to deploy number pooling by the current November 24, 2002 deadline. ALLTEL and Western emphasized the importance of LNP forbearance for smaller and mid-sized carriers, particularly those serving rural areas. Forbearance for such carriers is important for a number of reasons, including: the more pressing public interest need to deploy pooling; limited financial and personnel resources to allocate to the multiple regulatory mandates currently being deployed (*e.g.*, pooling, E-911, CALEA, abbreviated dialing, digital/TTY); and network reliability concerns, a particular concern for rural carriers for whom roaming is a critical component of their business. ALLTEL emphasized that many of the personnel resources currently implement pooling will necessarily need to be involved in deploying LNP even after the MIN-MDN separation common to both

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pooling and LNP is completed. ALLTEL and Western indicated that their estimated allocation of costs between number pooling and LNP is generally consistent with that provided by other carriers in the record.

The parties also discussed the competitiveness of the CMRS marketplace and the fact that wireless LNP is not necessary for wireless-wireline competition, as indicated by ALLTEL's and Western's experience (notably Western's experience in rural markets). ALLTEL and Western also stated that LNP is not a priority for consumers when measured against what consumers truly desire and what drives competition: affordable prices, better service and new and innovative technology. In this regard also, participants discussed Telphia's January 22, 2002 *ex parte* submission in this proceeding. Participants also discussed cost recovery issues associated with LNP deployment, such as per-port charges, as well as potential delays in pooling and LNP deployment by smaller rural carriers that could adversely affect nationwide deployment. Finally, ALLTEL stated that if the Commission does not grant permanent forbearance, it should forbear at least an additional 18 months beyond the current November 24, 2002 deadline to ensure adequate testing and reliable implementation of number pooling. Western advocates forbearance consistent with Verizon Wireless's petition.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this letter is being submitted electronically in the above-referenced docket. If there are any questions concerning this filing, please contact the undersigned.

Sincerely,

Robert G. Morse/s/_____

Robert G. Morse