

Samuel Weiler  
Information Networking Institute  
Carnegie Mellon University  
5000 Forbes Avenue  
Pittsburgh, Pennsylvania 15213  
412-401-6205

28 February 2002

Dear Acting Secretary Caton:

In accordance with Section 1.1206 of the Commission's rules, this is to provide notice of an ex parte communication regarding WT Docket No. 01-184, Verizon Wireless' petition for forbearance from the wireless number portability (WNP) requirements.

Today I spoke with Paul Margie, Spectrum and International Legal Advisor to Commissioner Copps, and, as seems to have been my habit in this proceeding, advocated for the denial of Verizon's petition. I referred to and, in some cases, repeated arguments made in by previous filings.

Most of our conversation was about the possible delay of the WNP requirement. I made the same arguments that I disclosed on 26 February, namely that there's little to be gained from a long (ie. 6 month) delay over a short (ie. 45 day) delay: any technical problems from number pooling are likely to appear in the first few days after number pooling cutover, not months down the road. Furthermore, it may be better to implement WNP soon after number pooling so that the engineers involved have the number pooling experience fresh in their minds and can diagnose any interactions between the two. I also suggested that carriers concerned about doing both number pooling and WNP at the same time be encouraged to voluntarily implement number pooling earlier, perhaps in September.

I observed that a bad precedent would be set if the Commission fails to penalize carriers who miss the WNP deadline or allows a further extension based on claims of technical difficulty, especially given the years of warning the carriers have had. Specifically, I asked that carriers be required to offer call forwarding (at their own expense) or provide some other direct compensation to customers whose numbers they are unable to port.

I also advocated for consumer protections to ensure that WNP will be realistically available to consumers and to prevent abusive practices from CMRS carriers trying to discourage churn.

Sincerely,  
Samuel Weiler