



CTIA

Building The Wireless Future™
Cellular Telecommunications & Internet Association

ORIGINAL

EX PARTE OR LATE FILED

February 27, 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

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FEB 27 2002
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **Ex Parte Presentation**
Docket No. 01-184

Dear Mr. Caton:

On February 26, 2002, the Cellular Telecommunications & Internet Association ("CTIA") represented Diane Cornell, Vice President for Regulatory Policy, and Christopher Guttman-McCabe, Director for Regulatory Policy, along with Doug Brandon, AT&T Wireless, Diane Smith, ALLTEL, Susan Wichmann, Cingular Wireless, Roger Sherman, Sprint PCS, and Anne Hoskins of Verizon Wireless, met with Commissioner Copps and his wireless advisor, Paul Margie. The parties discussed the need for a decision soon on Verizon's LNP Forbearance petition. In particular, the parties discussed the attached presentation.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Christopher Guttman-McCabe

cc: Commissioner Michael Copps
Paul Margie

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TALKING POINTS LOCAL NUMBER PORTABILITY

- The wireless industry supports the thousand-block rollout schedule and intends to be ready in all affected NPAs.
- However, the simultaneous implementation of both pooling and porting could jeopardize the ability of carriers to successfully implement pooling. Implementation of pooling alone will pose significant challenges:
 - MIN/MDN separation (separating the mobile identification number from the mobile directory number) will be a major challenge.
 - Wireless carriers will be forced to catch up to wireline (over 150 area codes).
 - Wireline and wireless carriers are concerned about risks to the public switched telephone network.
- The simultaneous mandates will:
 - Pose serious risks to network reliability.
 - Divert valuable resources necessary to continue to address network buildout and quality of service issues.
- There is no cost-benefit analysis that can justify the LNP mandate:
 - Landline local number portability (mandated by Congress, unlike wireless) made sense to spur competition.
 - There is scant evidence, however, that wireline consumers have received benefits to justify \$3 billion spent for local exchange portability.
 - Incremental cost of providing LNP to wireless subscribers will greatly exceed costs of wireline portability (MIN/MDN costs, new inter-carrier communications systems costs, industry's diverse communications channels need to be educated).
 - Already 30% churn.
- At a minimum, the commission should extend the porting deadline for over two years. Extending the deadline will:
 - Reduce risks to network functions.
 - Allow the wireless industry to get through the pooling implementation schedule.
 - Facilitate the wireless industry's ability to successfully address other priorities like E-911, CALEA, TTY, and network buildout.
- **NO MATTER WHAT THE COMMISSION DECIDES, IT SHOULD MAKE A DECISION VERY SOON.**
 - Wireless carriers are having an extremely difficult time making critical resource allocation decisions.
 - Carriers need time to focus on pooling.
 - Carriers need to know if they also have to focus on porting.