

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Petition Pursuant to 47 U.S.C. 160 for Partial) WT Docket No. 01-184
Forbearance from the Commercial Mobile)
Radio Services Number Portability Obligation)
)

**EX PARTE COMMENTS
ON ADVERSE IMPACT OF WLNP ON POOLING AND
MIN/MDN SEPARATION ON E911**

Missouri RSA No. 7 Limited Partnership dba Mid-Missouri Cellular (“MMC”), Illinois Valley Cellular RSA 2-I Partnership, Illinois Valley Cellular RSA 2-II Partnership, Illinois Valley Cellular RSA 2-III Partnership (“Illinois Valley Partnerships”), Public Service Cellular, Inc. (“PSC”), Farmers Cellular Telephone, Inc. (“Farmers”) and Northwest Missouri Cellular Limited Partnership (“NMC”)¹ (collectively the “Rural Carriers”), by their attorneys, hereby respectfully submit additional information for consideration in connection with the above-referenced petition for forbearance on implementing wireless local number portability (“WLNP”) filed by Verizon Wireless. As the deadline approaches for implementation of WLNP and thousands block number pooling (“TBNP”), it is becoming ever more apparent that several issues, unique to the wireless environment, might not have been realized or fully considered. These unintended consequences may result in a serious degradation to the other wireless service mandates also being implemented at this time. Specifically, based upon recent developments, it has been become clear that proceeding to deploy WLNP will result in a need for dramatically more numbering resources in the rural areas than

¹ Farmers and NMC did not participate in previous filings with MMC, PSC, and the Illinois Valley Partnerships, but share the concerns and the issues addressed herein. As such, Farmers and NMC have joined this consortium of rural carriers.

present, frustrating the number conservation intent of TBNP. Accordingly, the Rural Carriers respectfully submit that these issues provide further justification for not rushing to deploy WLNP at this time. Moreover, inasmuch as WLNP is the issue that requires separation of the mobile identification number (“MIN”) and the mobile directory number (“MDN”), and given that it has now become quite apparent that the MIN/MDN separation will adversely affect 911 services, the Rural Carriers submit that the FCC should ensure that MIN/MDN separation either not be implemented until this issue can be addressed or be implemented only in a manner that does not allow for the actual assignment of digits that differ in the separated MIN/MDN data fields until such time as the 911 call-back issue can be fully addressed.

I. WLNP MAY FRUSTRATE THE INTENT OF TBNP BY SPEEDING NUMBER EXHAUSTION

Rural commercial mobile radio service (“CMRS”) operators are licensed for geographic areas that span multiple landline local calling exchanges. For example, the MMC market (Mo. RSA No. 7) encompasses an area that is served by approximately 70 local landline exchanges. Each NPA-NXX utilized by MMC has a rate center associated with that code. The only way for MMC to obtain local calling from a landline exchange to one of its mobiles is for MMC to establish *both* a direct connect facility from the serving landline end office in that exchange to MMC’s network *and* a dedicated NPA-NXX with a rate center in each and every landline local calling area where toll-free landline originated calling is desired.² In MMC’s market, this would require the utilization of

² In a formal arbitration proceeding before the Missouri Public Service Commission (“PSC”), MMC tried to obtain local landline originated calling without the need to establish a dedicated NPA-NXX in each exchange through utilization of direct connect circuits which would have allowed the landline telephone company to route calls directly to MMC without the need to utilize any portion of the toll network. The Missouri PSC decided that issue against MMC, instead mandating the establishment of both direct connect facilities *and* a dedicated NPA-NXX in each rate center where

approximately 70 NPA-NXX codes. The cost of establishing and maintaining that quantity of codes, coupled with the cost of implementing and maintaining direct circuits to each of those exchanges, is prohibitive.

Accordingly, CMRS carriers have, in many instances, resorted to a far less costly (and far less inefficient from a numbering standpoint) means of allowing landline customers to call CMRS numbers without incurring toll charges. That methodology is known as reverse toll billing (“RTB”). Under that procedure, while the landline call to a CMRS number is still a toll charge, the toll charge is billed to the CMRS carrier instead of the landline party placing the call. From the perspective of the landline carrier, it is revenue neutral inasmuch as the toll is still collected for the call (albeit from the CMRS carrier instead of the landline party placing the call). While the CMRS carrier incurs the toll charge for that call, in many instances (especially in the more rural areas) the costs associated with those toll charges are substantially less than the cost of establishing and maintaining dedicated circuits to that local calling area. From a numbering standpoint, the RTB methodology is far more efficient as a single NPA-NXX code can be used for a wide area spanning multiple local landline calling areas, with landline-originated calling having the “appearance” of toll free calling, by the CMRS carrier actually paying the toll charges. WLNP threatens this long-standing practice.

Appended hereto as Attachment A is a letter received by MMC from the Local Telecommunications Division of Sprint with respect to its landline operations.³ There are more than

MMC wanted local landline-originated calls to be placed to its mobiles without the landline subscriber incurring a toll charge. Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular’s Petition for Arbitration Pursuant to 47 U.S.C. Section 252 to Establish an Interconnection Agreement with Southwestern Bell Telephone Company, Case No. TO-99-279, *Arbitration Order*, dated Apr. 8, 1999.

³ NMC has received a similar letter from Sprint.

twenty (20) Sprint landline phone exchanges within Missouri RSA No. 7. As Sprint explains, the practice of RTB is being eliminated, in its entirety, solely as a result of WLNP. Sprint explains:

Sprint has pursued potential solutions that would allow the RTB service to continue to be offered, however certain issues related to notification of wireless numbers that are ported could not be resolved. Based on these findings, Sprint has concluded that the RTB service would have to be discontinued.

In other words, since Sprint will no longer be able to simply bill all numbers dialed to a particular NPA-NXX code to the CMRS carrier assigned to that code, RTB is being discontinued.

Where a CMRS carrier was utilizing RTB for the Sprint exchanges in Mo. RSA No. 7 to maintain the same local calling area with respect to landline-originated calls, the CMRS carrier will need to establish dedicated facilities to each local exchange *and* a dedicated NPA-NXX. In this example, more than 20 new NPA-NXX codes would need to be established. While it is unlikely that the economics would support that level of dedicated facilities, even if a carrier were only to take steps to maintain landline-originated “local” calling to three of those more than twenty exchanges, it would require the establishment of two new NPA-NXX codes, each with a different rate center, in addition to the existing NPA-NXX. That would result in the otherwise unnecessary assignment of 20,000 additional numbers in an area which has been more than adequately served with a single NPA-NXX code.⁴

⁴ TBNP does not address this issue either. First, most of the Sprint exchanges in the RSAs are not located within a top 100 MSA, and therefore numbers assigned to those rate centers would not be subject to pooling (i.e. full NPA-NXX codes would be assigned). Moreover, even if the numbers were subject to pooling, current rules only envision pooling of an NPA-NXX code within a given rate center. In other words, while multiple CMRS carriers might be able to share a single new NPA-NXX code within a given exchange, the artificial need has still been created to dedicate a full 10,000 block of numbers to each such landline local calling area; numbers that have not been required in the RTB regime.

It should be noted that MMC has previously urged in its comments that thousands blocks be able to be assigned to differing rate centers subserved by the same landline tandem. While this MMC proposal would lessen the impact of the loss of RTB on rural carriers, there seems to be little interest in that proposal.⁵

Significantly, a decision to proceed with TBNP while forbearing on implementing WLNP would moot this issue.

II. MIN/MDN SEPARATION THREATENS THE EFFECTIVENESS OF E911 OPERATIONS

The Federal Communications Commission (“Commission” or “FCC”) has long recognized the advantage of providing the emergency public service answering point (“PSAP”) with a dial-back number to allow the PSAP to re-establish communications in the event that an emergency 911 call is “cut off.” The Commission has also recognized the need to allow all mobile phones to access 911 regardless of whether or not they are validly subscribed to a wireless service. As a result, disconnected former CMRS subscriber phones, as well as “911-only” phones, are in active service from the standpoint of being able to complete 911 calls. In order to ensure that there is no chance of any 911 call being blocked, the Rural Carriers understand that the standard protocol within virtually every CMRS switch is to simply route a 911 call to the appropriate PSAP without performing any sort of validation or authentication on the phone placing the call. The MIN of the phone is passed along to the PSAP.

The problem with these types of calls is that unsubscribed and 911-only phones do not have a “call-back” number. In point of fact, the MIN from a phone that was previously disconnected may

⁵ See Reply Comments of Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular, WT Docket No. 01-184 (filed Oct. 22, 2001) (“Mid-Missouri Reply”) at 4-6.

actually represent a “dialable” number for another currently-active handset. This issue, while limited in scope under the current operating scheme, will become a near ubiquitous problem if separation of the MIN and the MDN is allowed to proceed, as presently proposed.⁶

The Rural Carriers have previously demonstrated that pooling-only does *not* require the splitting of the MIN and MDN.⁷ In an effort to try and achieve industry-wide consensus, the Rural Carriers circulated a proposal that would have allowed carriers, on a case-by-case basis, to proceed with MIN/MDN separation, on an internal basis, so long as the digits assigned as the MIN corresponded to the digits assigned to the MDN. While this would have required some minor changes in the methodology used for the assignment of MINs, the Rural Carriers believed that such a proposal would have allowed for carriers to elect whether or not to proceed with the MIN/MDN separation, especially since it would not be required at all, absent WLNP.⁸ A copy of the Rural Carrier’s proposal is appended hereto as Attachment B.

This proposal was not previously submitted to the Commission, as informal discussions with the “large” carriers indicated that there was not support for this proposal as it would require a change

⁶ The Rural Carriers are aware that the MIN/MDN separation, as a means of accomplishing WLNP, was not an FCC mandate but rather an approach developed by a portion of the wireless industry. However, to the extent that this approach could adversely impact the Commission-mandated 911 program, the FCC clearly would have an interest in exploring alternative means of implementing number pooling without separating the MIN/MDN, especially in the context of forbearing on the WLNP implementation and proceeding with a “pooling-only” requirement at this point in time.

⁷ See Mid-Missouri Reply at 12-16, and Attachment A.

⁸ For example, MMC has determined that proceeding with the MIN/MDN separation where the same digits are not assigned to both fields, would result in a first year implementation and operational expense of \$450,000 as compared to no cost whatsoever being incurred to support TBNP without MIN/MDN separation or, with MIN/MDN separation so long as the same digits were used to populate both data fields.

in the software which many of the large carriers were proceeding to deploy for pooling. The problem, as explained to the Rural Carriers, is that the MIN assignment software being developed for the large carriers was not written so as to even try and avoid assignment of differing MINs and MDNs. As explained to the Rural Carriers, in the context of WLNP, there was no perceived need to try and correlate these two fields. Accordingly, the Rural Carriers understand that the large carriers intend to proceed to randomly assign MINs without regard as to whether or not they match the MDN (even where the carrier has the same MIN/MDN available) whether or not the FCC proceeds with WLNP!

If this is true, then the problem associated with providing “dial-back” numbers to the PSAPs, a minuscule problem in the context of unsubscribed and 911-only handsets, will become a ubiquitous problem for all carriers that proceed with MIN/MDN separation, in the form presently planned by the large carriers. Specifically, the MIN in the handset will, with respect to *every* mobile activated after the large carriers have implemented their presently-planned MIN/MDN separation, have a MIN that does *not* correspond to the MDN (even when the carrier could have assigned the same MIN and MDN and even absent WLNP). As a result, the number presented to the PSAP from all phones activated after the implementation date will *never* provide the PSAP with a call-back number. While, conceivably, the network protocol for the way in which all switches handle 911 calls could be changed to address this issue, to the extent that the large carriers view the changing of their MIN/MDN assignment software as too burdensome of an obstacle to the timely implementation of TBNP, the need to re-write the software to change the means in which every vendor’s wireless switches handle 911 calls would seem to be a much larger task. At a minimum, it would seem to the Rural Carriers that *no* MIN/MDN separation scheme should be allowed to proceed if, in doing

so, a far greater (and totally avoidable) problem is created for the PSAPs and for the 911 service offering in general.

III. CONCLUSION

It is becoming ever more apparent that the differences between wireline and wireless networks are such that implementation of WLNP and TBNP can result in far-reaching unintended consequences; consequences that do not arise in conjunction with the same implementations in a wireline environment. As explained above, WLNP can have the result of greatly increasing the exhaustion rate of NPA-NXX codes in the rural areas because landline carriers have come to realize that WLNP will require them to terminate the RTB practice which has been used for years to enable wide-area landline-originated calling that, to the landline customer, appears to be toll free. WLNP will cause that practice to terminate. With respect to TBNP, aside from the need for rural carriers to needlessly incur costs associated with MIN/MDN separation, it now appears as though proceeding with MIN/MDN separation would result in the loss of the ability for wireless carriers to provide call-back numbers to PSAPs for 911 calls from any CMRS handset activated after the MIN/MDN separation takes effect. It is unlikely that the FCC envisioned sacrificing this vital safety issue for the sake of allowing the large carriers to proceed with MIN/MDN separation as a means to accomplish TBNP, especially in the context of a delayed WLNP deployment. While the FCC allowed the industry to develop its own means of accomplishing pooling and porting, the Rural Carriers do not believe that the FCC envisioned a protocol that would be implemented at the expense of degrading 911 emergency service.

Clearly, much needs to be resolved before proceeding with WLNP or allowing the MIN/MDN separation to proceed for pooling only, as presently envisioned by the large carriers. We

urge the Commission to forbear WLNP implementation and, if carriers proceed with MIN/MDN separation, to require that they do so in a way that neither harms rural carriers nor interferes with E911 call-back requirements.

Respectfully submitted,

Missouri RSA No. 7 Limited Partnership dba
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Illinois Valley Cellular RSA 2-I Partnership
Illinois Valley Cellular RSA 2-II Partnership
Illinois Valley Cellular RSA 2-III Partnership
Public Service Cellular, Inc.
Farmers Cellular Telephone, Inc.
Northwest Missouri Cellular Limited Partnership

By: /s/ Michael K. Kurtis
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Their Attorney

March 26, 2002

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ATTACHMENT A



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March 8, 2002

Dear Valued Sprint Customer:

I want to alert you to a change that is taking place in 2002, associated with the Reverse Toll Billing (RTB) service Sprint offers to wireless carriers today. On November 24, 2002 the wireless industry is scheduled to implement Wireless Local Number Portability which will directly impact Sprint's ability to continue to offer this service.

Therefore, effectively immediately no new RTB arrangements will be established. In addition, Sprint will begin working with all the wireless carriers who currently have existing RTB arrangements, to move them off the RTB service by November 1, 2002.

Sprint has pursued potential solutions that would allow the RTB service to continue to be offered, however certain issues related to notification of wireless numbers that are ported could not be resolved. Based on the findings, Sprint has concluded that the RTB service would have to be discontinued.

For those carriers who are currently using the RTB service, this letter is to alert you that we will be contacting you in the near future to make plans and establish schedules to manage the transition process over the next eight months. When this is completed, the normal (land to mobile) calling charges will be restored in those areas where you presently have the RTB service.

Sprint will do everything possible to make this transition smooth. It is unfortunate that these steps have to be taken, since Sprint has always felt that RTB was a valuable service for our wireless carriers. If you have any immediate questions or would like a further explanation about this decision, please contact me at your earliest convenience.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia Oliver".

Cynthia Oliver
Field Service Manager

ATTACHMENT B

KURTIS & ASSOCIATES, P.C.

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March 1, 2002

Proposal To Allow Number Pooling to Proceed without the need for MIN/MDN Separation

Pooling is needed in the major markets to recover unused numbers and conserve NPA-NXX codes. Pooled numbers can only be assigned within the same rate center. Mid-Missouri Cellular, Public Service Cellular, Inc. and the Illinois Valley Cellular RSA 2 Partnerships submit that, by controlling the manner in which contaminated thousands blocks recovered from wireless carriers are reassigned, the entire MIN/MDN separation issue can be rendered moot and the wireless industry can move forward immediately to implement pooling-only *with virtually no increased costs to the existing CMRS networks or changes to the long-standing roamer validation process!* In addition, with slight modifications to the assignment of MBIs, carriers that wish to proceed with MIN/MDN separation at this time *can do so* without the need for all carriers to proceed with MIN/MDN separation, while still ensuring that nationwide roaming will be available for subscribers assigned from pooled number groups.

I. Methodology by which MIN/MDN separation is not needed for number pooling in the absence of number porting

A. Elements of the Proposal

- 1) The recovery of numbers from all carriers should proceed, precisely as presently scheduled.
- 2) Contaminated thousands blocks recovered from wireless carriers should *not* be assigned to any other wireless carrier. These contaminated blocks *can* be re-assigned to a non-wireless carrier for any landline use (*e.g.*, LEC, CLEC, etc.).
- 3) Contaminated thousands blocks recovered from CLECs and/or LECs *can* be assigned to wireless carriers.

B. Discussion

By implementing this one limitation (not on the recovery of contaminated wireless thousands blocks but only with respect to their reassignment), wireless roamer validation can proceed using existing software and validation techniques without any additional costs to the

wireless industry as the industry already has the capability to validate roamer numbers down to the thousands block level.

For example, if 660-620 becomes a pooled NPA-NXX, and assuming that there is even just a single number assigned (say 660-620-2121), the 660-620-2 thousands block would be deemed "contaminated". Accordingly, that thousands block would *not* be assigned to any other wireless carrier but could be assigned to any landline carrier in the same rate center. The remaining 660-620-X thousands blocks could be assigned to any other wireless or wireline carrier. Of course, if the donating wireless carrier subsequently required more numbers and the 660-620-2 block had not yet been assigned to a wireline carrier, it could be reassigned to the donating wireless carrier.

In this example, although there is only one number in the 660-620-2 thousands block that is a valid wireless roaming number, and since the remainder of the block would *not* be assigned to another wireless carrier, the roaming partners with the donating carrier could still perform roamer validations based on the entire 660-620-2 thousands block. This is due to the fact that the donating carrier, even though the balance of the thousands block had been pooled, would still be the only *wireless* carrier that could have a valid roaming number in that block (the remainder of the block would be assigned to a landline carrier and would therefore never appear as a valid roamer). Should someone try to validate a bogus number out of that block (say 660-620-2111), the validation request would be sent to the original donating carrier which would deny roamer service to the bogus number.

Similarly, where the CLEC returns a contaminated thousands block, that contaminated block could be assigned to a wireless carrier, inasmuch as the contaminated numbers reserved by the donating CLEC carrier would never be valid mobile roamers. Accordingly, even though the wireless carrier receiving that block would not actually have the entire thousands block of numbers, for purposes of roamer validation the roaming partners would simply validate that entire thousands block with the wireless carrier receiving that thousands block. Again, there can never be a valid wireless roamer appearing on the contaminated numbers which were reserved by the donating CLEC.

This single limitation on assigning wireless contaminated thousands blocks to other wireless carriers would stay in place until such time, if ever, that WLNP forbearance is terminated. Significantly, this approach will have no impact on the quantity of thousands blocks returned for reassignment or any material impact on the reassignment of blocks, as the only limitation would be on reassigning a wireless contaminated block to another wireless carrier.

II. Methodology by which carriers, on a case-by-case basis, can elect to proceed with MIN/MDN separation without other carriers being required to do so, while still ensuring nationwide roaming for pooled numbers

A. Elements of the Proposal

- 1) All elements of Proposal I apply.
- 2) Only *one* wireless carrier will be assigned numbers from any pooled NPA-NXX until such time as porting is deployed.
- 3) The single wireless carrier receiving numbers from a pooled NPA-NXX will be assigned the corresponding MBI.
- 4) All wireless carriers that proceed with MIN/MDN separation will only assign MINs and MDNs that are the same 10 digits.
- 5) Although standard 6 digit MBIs will be assigned, any given MBI will be deemed exhausted if the carrier was unable to assign an additional MIN that included that MBI that would not correspond to the MDN. Stated another way, a carrier would be able to get an additional MBI assigned, without physically exhausting a previously-assigned MBI if, to do so, the wireless carrier would need to assign a MIN and an MDN that were not identical.

B. Discussion

Carriers that are already “too far down the path of MIN/MDN separation” can proceed as planned except that MINs and MDNs, while allocated to distinct data field, would continue to have the same number assigned. The only “accommodation” that would be required to enable this to be enacted until such time as WLNP is deployed, would be that only a single wireless carrier would be assigned numbers from a pooled NPA-NXX and, where other thousands blocks within that pooled NPA-NXX were assigned to LECs or CLECS, the wireless carrier would *not* be required to exhaust that MBI to the extent that doing so would necessitate the assignment of a MIN that would not be able to match and MDN. As such time that WLNP were deployed, the previously un-used MINs could be freely assigned.

Alternative

If seven digit MBIs were assigned to correspond to pooled thousands blocks, then the limitation relating to one wireless carrier per pooled NPA-NXX could be eliminated and MINs would continue to exhaust at the same rate as MDNs in each thousands block.

CERTIFICATE OF SERVICE

I, Carol A. Mindzak, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 26th day of March 2002, had copies of the foregoing “EX PARTE COMMENTS ON ADVERSE IMPACT OF WLNP ON POOLING AND MIN/MDN SEPARATION ON E911” sent via Electronic Mail to the following:

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