

RURAL TELECOMMUNICATIONS GROUP

advocate of rural wireless telecommunications providers

1000 Vermont Avenue, NW, 10th Floor
Washington, DC 20005

To: Secretary, Federal Communications Commission
From: Kenneth Johnson, Legislative and Regulatory Director
Date: April 10, 2002
Re: *Ex Parte* Communication – April 9, 2002

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

On April 9, 2002, Kenneth Johnson and Kent Larsen of Bennet & Bennet, PLLC, representing the Rural Telecommunications Group (“RTG”), participated in a telephone meeting with Kris Monteith, Blaise Scinto, and Jared Carlson of the Federal Communications Commission’s (“FCC” or “Commission”) Wireless Telecommunications Bureau (“WTB”). Also representing RTG on the call were Jim Wickham of Artic Slope Telephone Association Cooperative in Alaska and Denise Brown of Bluegrass Cellular in Kentucky.

RTG emphasized its support for the March 26, 2002 comments filed by Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular, 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., and Northwest Missouri Cellular Limited Partnership (collectively the “Rural Carriers”). Specifically, RTG outlined the unintended consequences of Wireless Local Number Portability and Pooling (“WLNP”). The “large” carrier solution to WLNP requires a cellular phone’s mobile identification number (“MIN”) and mobile directory number (“MDN”) to be split, resulting in unrelated MINs and MDNs, affecting both (1) E911 callback capability and (2) reverse toll billing (“RTB”) plans.

First, RTG explained how approximately two percent of cellular phones today do not send accurate callback numbers to public safety answering points (“PSAPs”). This two percent consists of de-activated phones and “911 only” phones. In these phones, there is no relation between the MIN and MDN, making the callback information inaccurate or unavailable. RTG stated that once the proposed plan by the “large” carriers to make the MIN/MDN split reaches fruition, all newly activated cellular phones will not have meaningful callback numbers. Since

the public safety harm of the MIN/MDN split is obvious, RTG suggested that the FCC delay the split resulting from WLNP until the issue is resolved.

Second, RTG lauded the benefits of RTB which allows landline customers to call cellular numbers without incurring a toll charge. RTB allows the landline carrier to send the toll bill to the cellular carrier, rather than its landline customer. RTB creates the public benefit of larger cellular calling areas and makes cellular service a viable wireline competitor. With MIN/MDN separation, wireline carriers will no longer be able to simply bill the cellular carrier for a toll call since MIN/MDN separation will make identifying customers and billing the appropriate carrier impossible. In addition, with no RTB, wireless carriers will be forced to order new NXX codes in order to continue offering larger caller areas, thus leading to more number exhaustion.

RTG summed up its meeting by stating that, in many cases, small carriers were left out of the technical implementation plans by the large carriers, leading to unintended results.

Sincerely,

/s/

Kenneth C. Johnson
Rural Telecommunications Group

Cc: Kris Monteith - FCC
Blaise Scinto - FCC
Jared Carlson - FCC
Michael Kurtis – Kurtis & Associates, P.C.