

CTIA

Building The Wireless Future

Cellular Telecommunications & Internet Association

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VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Ex Parte Comments of the Cellular Telecommunications & Internet Association, WT Docket No. 01-184

Dear Ms. Dortch,

I am writing in response to the *ex parte* comments submitted in this proceeding on March 26, 2002, by Kurtis and Associates on behalf of eight rural wireless carriers (the "Kurtis Comments"). The Kurtis Comments propose an alternative technical solution for Thousand Block Number Pooling ("Pooling"), but concede that this alternative solution only can be used in the interim between pooling and porting. The wireless industry has looked at the Kurtis proposal, and has concluded that it does not meet the current pooling requirements and could not be implemented by the November 24, 2002, pooling deadline. The Kurtis Comments also ask the Commission to consider the impact of the MIN/MDN separation on other mandates, such as 9-1-1 and number conservation. Echoing CTIA and its members, the Kurtis Comments also express concern regarding how the simultaneous implementation of pooling and wireless number porting needlessly risks the integrity of the Public Switched Telephone Network.

MIN/MDN separation lies at the heart of how the wireless industry will deploy both pooling and wireless number portability ("WNP"). The FCC has stated, and CTIA agrees, that timely implementation of number pooling is critical – both for number resource optimization and to provide wireless carriers with the numbering resources they need to grow and compete. CTIA and its members are committed to meeting the FCC's November 24th deadline for number pooling. To that end, the wireless industry has developed an implementation work plan that will meet the pooling deadline. The industry's MIN/MDN solution is central to the implementation of pooling, and was developed many years ago through open industry forums.



Kurtis and Associates now proposes an alternative to the MIN/MDN solution for pooling, but concedes that its proposal does not support number porting. While CTIA strongly supports delaying the implementation of WNP until the roll-out of wireless number pooling has been completed, a process that will extend into 2004, the proposal advanced in the Kurtis Comments simply is not a solution for either number pooling or number porting, and thus is not a viable alternative to the MIN/MDN separation that has been discussed and adopted by small, medium and large wireless carriers as the method for facilitating call routing and the preservation of nationwide roaming.

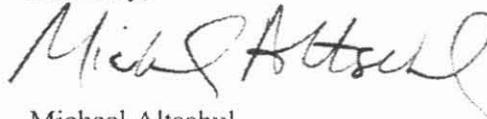
The Kurtis proposal dictates that only one wireless carrier will be able to accept "thousands blocks" of numbers within a Central Office code. A NANC working group proposed a similar option two years ago. However, the FCC rejected the proposal because it does not constitute "full pooling". Relying on the FCC's decision, wireless carriers have developed IT and OSS systems that support a pooling solution based on MIN/MDN separation. Changing direction now would take the wireless industry off an already tight implementation course and would delay Wireless Number Pooling.

The Kurtis Comments also note concerns regarding E-911 call-back capabilities. CTIA believes that the scope of the problem may be overstated. In most cases where Phase 1 E-911 has been implemented, wireless carriers that support the MIN/MDN separation will provide the appropriate call-back information (*i.e.*, the MDN) to the PSAP. Just last week, CTIA and NENA hosted an open meeting of technical experts to work through several issues related to how MIN/MDN separation will impact E-911 service. While there are scenarios in which uncertainties exist with respect to whether the PSAP will receive a "call-back" number, it is fair to say that these issues mostly arise from the consequences of the Commission's "uninitialized phone" and "strongest signal" requirements, and not the MIN/MDN separation.

In establishing the "uninitialized phone" and "strongest signal" requirements, the Commission recognized there would be situations where wireless carriers could not provide a call-back number for a user that was not registered on the carrier's network. Moreover, even with a valid call-back number (*i.e.*, the MDN), if a wireless phone is not registered on the network associated with its MIN (as either a home or roaming customer), it will not receive terminating calls from a PSAP -- or anyone else. In other words, with or without the correct MDN, the PSAP will not be able to call-back a non-subscribed phone (for such phones, a MDN is an oxymoron) or a wireless phone that is not registered (at the time of the call-back) on the wireless network associated with the user's MIN/MDN.

CTIA appreciates the importance of all of these issues, and their impact on Public Safety, rural carriers, and the integrity of the Public Switched Telephone Network. For that reason, we and the wireless industry's technical experts are committed to continue working on the 911 call-back issues with NENA. Moreover, as CTIA has urged, these issues underscore the importance of establishing a meaningful transition period between the pooling and porting implementation deadlines.

Sincerely,

A handwritten signature in cursive script that reads "Michael Altschul". The signature is written in dark ink and is positioned above the printed name.

Michael Altschul

Enclosure
cc: Attached Service List

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2002, I sent by e-mail a copy of the foregoing Ex Parte Filing Regarding the Adverse Impact of WLNP on Pooling and MIN/MDN Separation to:

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