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January 24, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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JAN 29 2003

MEDIA BUREAU

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JAN 24 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Litchfield County Cellular, Inc.*
Addendum to the Petition for Limited Waiver
and Extension of Time
ATTN: Wireless Telecommunications Bureau, Policy Division

Dear Ms. Dortch

Litchfield County Cellular, Inc. ("Litchfield"), by its attorneys, hereby submits this letter supplementing its underlying Petition for limited waiver and extension of time to support the nationwide roaming of ported and pooled numbers by November 24, 2002.¹ The underlying Petition was granted by the Commission on January 17, 2003.² By this addendum, Litchfield is requesting an additional thirty (30) days, until February 24, 2003, to meet its obligations regarding the requirement that all covered CMRS providers must be able to support nationwide roaming of ported and pooled numbers.³

In granting Litchfield's underlying Petition the Commission determined that Litchfield's request for additional time was "warranted" based upon Litchfield's "particular circumstances."⁴ The Commission recognized that Litchfield is a small rural carrier with limited financial resources? Litchfield explained in its Petition that, due to

¹ *Litchfield County Cellular, Inc. Petition for Limited Waiver and Extension of Time*, CC Docket 99-2000 (November 22, 2002) ("*Petition*").

² *Petitions for Temporary Waiver and Extension of Time by Cellular Phone Kentucky, Inc. and Litchfield County Cellular, Inc.*, CC Docket No. 99-2000, *Letter*, DA-03-165, (rel. Jan. 17, 2003) ("*Letter*").

³ See 47 C.F.R. § 52.31(a)(2).

⁴ *Letter*, at p. 3.

⁵ *Letter*, at p. 2.

its size, it has met major obstacles to obtaining the requisite upgrades to become compliant with the Commission's roaming **deadline**.⁶

Counsel for Litchfield spoke with Commission staff yesterday to informally notify the Commission that a further extension would be necessary and that Litchfield would file the instant letter. Litchfield regrets that, despite its best efforts, the timeline for receiving and installing the necessary upgrades and equipment has slipped. Litchfield is now scheduled to receive and install the final necessary upgrades to its current switch and equipment on January 31, 2003 and February 21, 2003. With these upgrades, Litchfield's system will be capable of supporting nationwide roaming of ported and pooled numbers by February 24, 2003. In light **of** this revised deployment schedule, an additional limited *de minimis* extension of the Commission's rules regarding the requirement to support the roaming of callers with ported or pooled numbers is necessary in order to provide Litchfield with the time it needs to complete installation of its equipment and switch upgrades. Litchfield will provide the Commission with an update on February 14, 2003.

Please contact the undersigned counsel with any questions you may have at (202)783-4141.

Sincerely,

Wilkinson Barker Knauer, LLP

By: 
William J. Sil
Georgina L.O. Feigen

cc: Barry Ohlson, Division Chief, Wireless Telecommunications Bureau, Policy Division
Jared Carlson, Deputy Division Chief, Wireless Telecommunications Bureau, Policy Division
Peter Trachtenberg, Wireless Telecommunications Bureau, Policy Division

⁶ *Petition*, at p. 2.