

CTIA

Building The Wireless Future™
Cellular Telecommunications & Internet Association

April 28, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

**Re: *Ex Parte* Presentation
CC Docket 99-200 and 95-116**

Dear Ms. Dortch:

On April 25, 2003, the Cellular Telecommunications & Internet Association (“CTIA”), represented by Michael Altschul, Senior Vice President, Policy and Administration and General Counsel, Diane Cornell, Vice President for Regulatory Affairs, and Lori Messing, Director of Numbering Issues, met with John Muleta, Chief, David Furth, Associate Bureau Chief/Counsel, Jennifer Tomchin, Legal Advisor, Jared Carlson, Deputy Chief of the Policy Division, and Jennifer Salhus, of the Wireless Telecommunications Bureau, to discuss two pending CTIA numbering issues.

On January 23, 2003, CTIA filed a Petition for Declaratory Ruling seeking clarification that LECs have an obligation to port telephone numbers to wireless carriers outside the legacy wireline rate center boundaries. In the meeting, CTIA emphasized that failure to act on the Petition well in advance of the November 24, 2003, porting deadline would result in significant confusion in the marketplace, and would undermine the Commission’s stated policy of encouraging Local Number Portability (“LNP”) to promote intermodal competition between wireless and wireline. CTIA emphasized that standard Service Level Agreements between carriers are sufficient to begin testing with LECs. This matter requires resolution if LNP is to proceed on schedule. A set of attached slides depicting the rate center disparity issue was distributed in the meeting.

CTIA also discussed the status of the Number Utilization Threshold Forbearance Petition, which was filed on June 28, 2002, and followed by Reply Comments on March



24, 2003. CTIA suggested that the Commission's Number Resource Optimization policies have worked effectively to conserve the North American Numbering Plan ("NANP"), citing the recently released NANP Administrator 2002 Annual Report as evidence. CTIA explained that requiring carriers to manage numbering resources beyond a 70% utilization threshold is unnecessarily burdensome, in that it would require carriers to utilize manual rather than automated number assignment processes. CTIA further emphasized that requiring carriers to manage to a 75% threshold would not provide significant number conservation benefits in the current NANP environment. Those states experiencing number shortages in specific area codes have been granted waivers to allow utilization at 75%, and CTIA supports the grandfathering of these waivers. CTIA noted that action before the July 1 threshold date for utilization increase would be useful.

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

Sincerely,

Diane J. Cornell

Diane J. Cornell

cc: John Muleta
David Furth
Jennifer Tomchin
Jared Carlson
Jennifer Salhus

