

CTIA

Building The Wireless Future™
Cellular Telecommunications & Internet Association

May 7, 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**

Dear Ms. Dortch:

On May 7, 2003, the Cellular Telecommunications & Internet Association (“CTIA”), represented by Michael Altschul, Senior Vice President, Policy and Administration and General Counsel, spoke on the phone with Bryan Tramont, Senior Legal Advisor to Chairman Powell, to discuss a pending CTIA numbering issue.

During the call, the parties discussed CTIA’s 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 been successful in conserving numbering resources and extending the life of 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 more costly manual rather than automated number assignment processes, with no corresponding benefit to the public or the NANP. CTIA noted that wireless carriers, because of their reliance on retail distribution channels, must manage number assignments on weekends as well as weekdays, and as a consequence of going to 1,000 block pooling, wireless carriers receive fewer numbers from the NANPA, and thus have a much smaller buffer to accommodate new activations. CTIA further emphasized that requiring carriers to manage to a 75% threshold would not provide significant number



conservation benefits in the current NANP environment, and should the NANP exhaust forecast change, the 5% of numbering resources forborne today could be recovered and assigned at a later date simply by raising the threshold to 75%. As for states experiencing number shortages in specific area codes that have been granted waivers to allow utilization at 75%, CTIA said that it supports the grandfathering of the existing state-specific waivers. CTIA also urged the Commission to act on its petition before July 1, 2003, when the utilization threshold is scheduled to increase.

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,

/s/ Michael F. Altschul

Michael F. Altschul

cc: Bryan Tramont

