

established June 18, 2003 as the compliance date for number pooling in the San Juan CMSA.⁴ However, wireless carriers such as VWPR are in the process of making network upgrades which are necessary both to provide LNP *and* to provide pooling. While VWPR foresees no difficulty in meeting the LNP implementation date, and will be able to pool once it has begun to offer LNP, it is simply not possible to provide pooling without first making the foundational upgrades to the network.

The requested extension is warranted because Puerto Rico is not in danger of depleting its number supply. The two NPAs in Puerto Rico are not in jeopardy of number exhaustion. In fact, while even the 787 NPA is not yet near exhaustion, the newly authorized 939 overlay NPA is only subject to limited use. Currently, 701 central office codes have been issued in the 787 NPA, and only 17 have been issued in the 939 NPA. The relatively small size of the Puerto Rico market means that it does not need additional numbers in the foreseeable future. Indeed, VWPR forecasts that it will need no more than five additional NXX codes during the coming year. Because there is no lack of numbers, consumers will not be harmed by this brief delay in the implementation of pooling.

An extension is also justified because more efficient use of NXX codes is not a competitive issue. Puerto Rico is currently served by six wireless carriers (AT&T Wireless, Centennial, Cingular, Movistar, Sprint and VWPR). Because there is no shortage of numbers in Puerto Rico, no carrier will be competitively disadvantaged by this extension. While the utilization rates of each carrier are different, VWPR has no reason to believe that there will be any foreseeable difficulty for any of the carriers in extending the implementation date for several months.

⁴ National Pooling Rollout Schedule, Sixth Quarter – June 15, 2003 through September 14, 2003, <http://www.nationalpooling.com/documents/fcc/rollout/SixthQuarterRollout.pdf>.

VWPR notes that LNP itself is not *per se* necessary to implement pooling. However, both pooling and LNP rely on the implementation of Local Routing Number (“LRN”) network architecture. VWPR is currently engaged in upgrading its switches and other facilities to provide LRN architecture.⁵ Once completed, these upgrades will also allow it to participate in pooling.⁶ While VWPR has been cognizant of the need to have these upgrades in place in order to meet the June pooling deadline, operational difficulties and challenges in implementing the systems have made meeting the June deadline impossible. As a result of these issues, and because there is no pressing competitive need for pooling in Puerto Rico, VWPR has now focused its efforts on ensuring that the upgrades will be in place for the LNP deadline in November.

Accelerating the network upgrades at this point would be counterproductive. For sound technical as well as financial reasons, these upgrades are best performed serially, on a switch-by-switch basis, rather than *en masse*. Doing so allows each carrier to install and carefully test the new facilities one at a time, and isolate any trouble caused by implementing the upgrades to a limited base of customers. This implementation schedule also allows carriers to better manage the financial impact of large-scale capital improvements. Attempting to put all of the necessary upgrades into place at once would thus severely jeopardize customer service.

Making the pooling and LNP deadlines consistent will substantially reduce the cost and complexity of compliance, and is necessary given the fact that compliance with the June deadline is not possible. Moreover, there will be no consumer or competitive harm caused by such a brief

⁵ VWPR believes that other wireless carriers serving Puerto Rico may be similarly situated, and may also be unable to meet the June 18th deadline.

⁶ Implementing solutions other than those required for LNP would be difficult, if not impossible. Moreover, any such implementation would be unduly wasteful, given that it would only be in place until November 24, when LNP capability will be implemented. Such a solution would be particularly nonsensical given that no carrier will need pooling during the period between June and November. A separate solution would thus offer no benefit whatsoever to customers in the Puerto Rico market.

extension. As a result, VWPR respectfully requests an extension of the pooling deadline in the San Juan CMSA to November 24, 2003.

Respectfully submitted,

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