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September 5, 2003

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *In the Matter of Telephone Number Portability*, CC Docket No. 95-116

Dear Ms. Dortch:

On September 3, 2003, Cronan O'Connell representing Qwest Communications International Inc., met with Barry Ohlson, Legal Advisor for Spectrum and International Issues to Commissioner Jonathan Adelstein of the Federal Communications Commission. The purpose of the meeting was to discuss intermodal telephone number portability issues as they relate to local number portability. The discussion was consistent with Qwest's comments as filed on the record in this proceeding and as reflected in the attached presentation

In accordance with Section 1.1206(b)(2) of the Commission's rules, the original and two copies of this letter and attachment are being filed with your office for inclusion in the public record of this proceeding.

Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is included for this purpose.

Sincerely,

cc Barry Ohlson (via e-mail at barry_ohlson@fcc.gov)
Scott Bergmann (via e-mail at scott_bergmann@fcc.gov)

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Intermodal LNP Talking Points

1. Qwest is very concerned about wireline consumer and business consequences if the FCC mandates LNP outside the rate center. The FCC should either defer intermodal LNP between wireline and wireless providers and issue an FNPRM or the FCC should affirm that its current rules apply to wireline and wireless intermodal LNP -- it's service provider portability
2. Before we get to the technical and legal issues, we need to discuss the consequences for the wireline consumer. In a nutshell, customer confusion which is not in the public interest. Wireline consumers today understand the boundaries of local and toll calls. Much confusion will occur if LNP is implemented outside the rate center because consumers will now inadvertently make and be billed for toll calls that were once local.
 - a. Example, of elimination of WAC in Salt Lake City
 - b. Example where the inaccurate billing can occur
 - c. Further, customers, in some instances, will not be able to port from a wireless to wireline provider "*it all depends*" and this is the last thing customers want to hear as they attempt to order service.
3. Compound that with the LEC Business Consequences
 - a. Effects local rates
 - b. Disadvantages wireline companies
 - i. Talk about wireless local competition line losses
 - ii. Talk about potential revenue losses
 - c. Requires significant reform of intercarrier compensation
 - d. Requires state commission review
 - e. Could require local switch generic upgrades and network routing modifications in some cases
4. Solution: How can we achieve number portability without negative consequences on consumers or the business?
 - f. Rate centers are the fundamental boundaries under which service provider portability is implemented
 - g. Wireline and Wireless LNP should be implemented within the rate center
 - h. Customers can even physically move within the rate center and take their telephone number
5. Finally, as a legal matter, we do not think the Commission can **change** the definition of LNP through the CTIA petition. This is not a clarification but a rule change.