Jeff Lindsey
Director
Federal Regulatory Affairs

Sprint Corporation
401 9th St, NW, Suite 400
Washington, DC 20004
Voice: 202 585 1921
Fax: 202 585 1896
Jeff.L.Lindsey@mail.sprint.com

September 25, 2003

Ms Marlene Dortch, Secretary
Federal Communication Commission
445 12th St., S.W.
Washington, DC 20554

RE: CC Dockets No. 99-200 and 95-116

Dear Mr. Dortch:

Sprint Corporation (Sprint) files this notice of *ex parte* regarding the dockets listed above. On September 24, 2003, Hoke Knox of Sprint, David Bench of NorTel, Amy Putnam of Neustar and the undersigned met with Cheryl Callahan, Pam Slipakoff and Sanford Williams of the Wireline Competition Bureau's Telephone Access Policy Division. The purpose of this meeting was to continue to discuss comments previously filed in greater detail, specifically the matter of telephone number pooling in areas where the ILEC is not Local Number Portability (LNP)-capable nor has implemented Local Routing Number (LRN) capabilities. Sprint includes two attachments discussed at the meeting in this notice.

Respectfully submitted,

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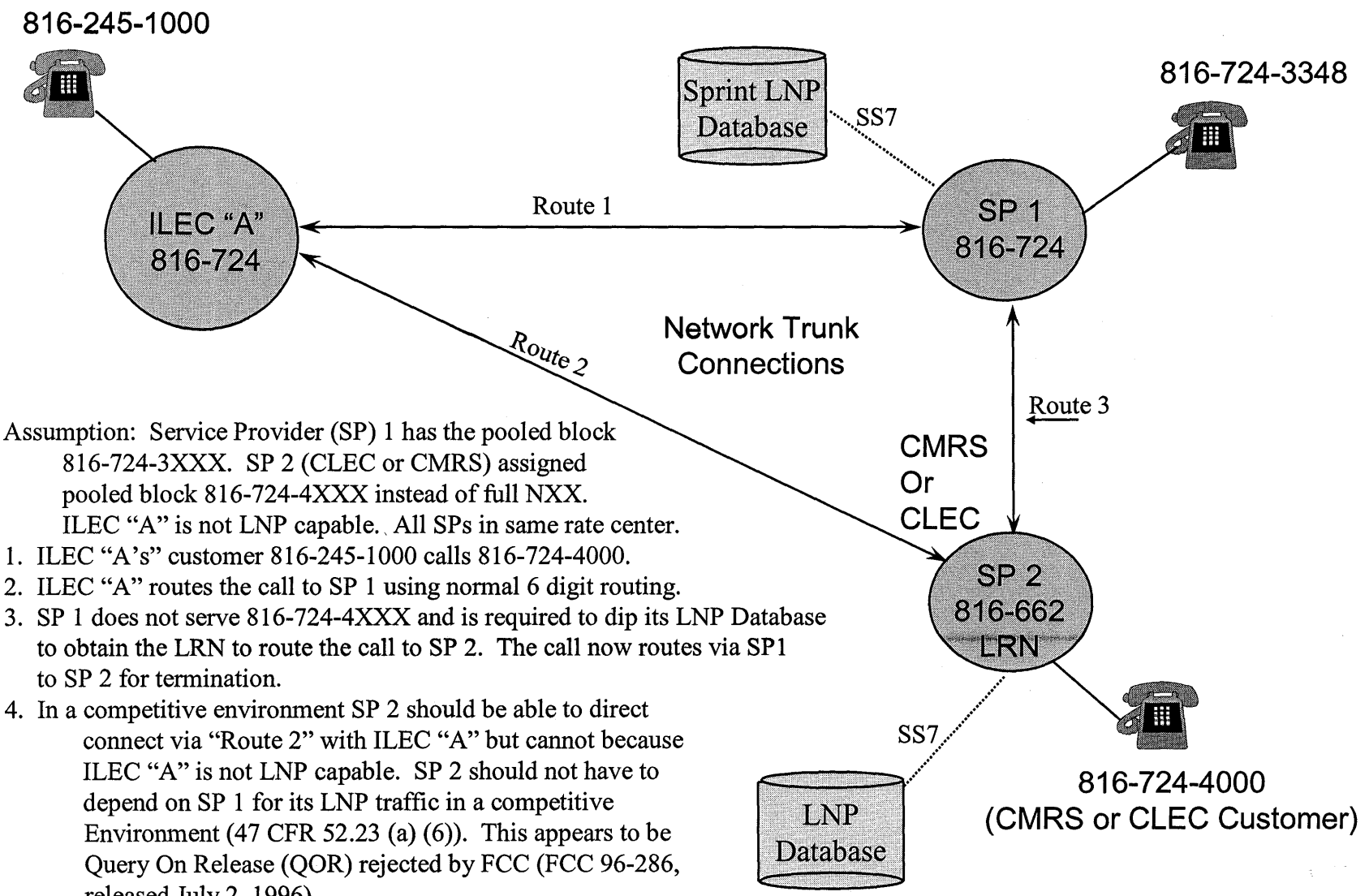
Jeff Lindsey

CC: Cheryl Callahan, FCC Wireline Competition Bureau
Pam Slipakoff, FCC Wireline Competition Bureau
Sanford Williams, FCC Wireline Competition Bureau
David Bench, Nortel
Amy Putnam, NeuStar

Pooling with ILEC not LNP Capable



Assumption: Service Provider (SP) 1 has the pooled block 816-724-3XXX. SP 2 (CLEC or CMRS) assigned pooled block 816-724-4XXX instead of full NXX. ILEC "A" is not LNP capable. All SPs in same rate center.

1. ILEC "A's" customer 816-245-1000 calls 816-724-4000.
2. ILEC "A" routes the call to SP 1 using normal 6 digit routing.
3. SP 1 does not serve 816-724-4XXX and is required to dip its LNP Database to obtain the LRN to route the call to SP 2. The call now routes via SP1 to SP 2 for termination.
4. In a competitive environment SP 2 should be able to direct connect via "Route 2" with ILEC "A" but cannot because ILEC "A" is not LNP capable. SP 2 should not have to depend on SP 1 for its LNP traffic in a competitive Environment (47 CFR 52.23 (a) (6)). This appears to be Query On Release (QOR) rejected by FCC (FCC 96-286, released July 2, 1996).

Pooling W/O ILEC Being LNP Capable

- Impairment
  - Query on Release (QoR) like architecture
    - QoR denied by FCC (47 CFR 52.23)
    - Numbers & call processing controlled by competitor
    - Non-LNP capable ILEC largest carrier in rate center
      - Can't direct connect for inbound traffic
  - Not a level competitive playing field

Pooling W/O ILEC Being LNP Capable

- Cost burden if Default Carrier (Code Holder)
  - ISP Traffic could be 5 DS-1s in and 5 DS-1s out. Cost estimate $80K (high level).
  - 3 ISPs – Estimated Costs - $240K (high level).
  - Major capital outlay with limited use if ILEC becomes LNP Capable. Six to twelve months.