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**Cronan O'Connell**  
Vice President-Federal Regulatory

*EX PARTE*

November 7, 2003

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

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

Dear Ms. Dortch:

On November 6, 2003, Cronan O'Connell of Qwest Communications International Inc. ("Qwest"), met with Jessica Rosenworcel, Legal Advisor to Commissioner Michael Copps of the Federal Communications Commission, to discuss intermodal Local Number Portability ("LNP").

In particular, Qwest discussed the fact that any rule change from the current LNP porting definition of porting within the rate center and its associated criteria<sup>1</sup> to any new definition and associated criteria requires a notice of proposed rulemaking by the Commission followed by an adequate transition to ensure a nationally uniform implementation under the oversight of the North American Numbering Council ("NANC") as directed by the Commission in 47 C.F.R. § 52.26(b)(3) of the Commission's Rules. For example, Qwest shared with the Commission an area code map of the Qwest 14-state area to demonstrate that any new LNP definition and associated criteria would have to be carefully vetted with the industry given that random decisions, like porting within area codes, holds many technical as well as interLATA implications that the Commission has yet to thoroughly address with the industry let alone delegate to NANC to determine the technical means to implement nationally as to avoid customer confusion regarding when a customer can or can not port to a wireline or wireless carrier.

In accordance with Commission Rule 47 C.F.R. § 1.49(f), this *ex parte* letter is being filed electronically for inclusion in the public record of the above-referenced proceeding pursuant to FCC Rule 47 C.F.R. § 1.1206(b)(2).

Sincerely,  
/s/ Cronan O'Connell

cc:  
Jessica Rosenworcel ([jessica.rosenworcel@fcc.gov](mailto:jessica.rosenworcel@fcc.gov))

Attachment

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<sup>1</sup> Today for purposes of porting within the rate center, both the customer's physical address as well as the customer's telephone number must be in the same rate center.

# Qwest Territory Area Code Boundary Inconsistencies

## Area Codes That Cross LATAs

Area Code	State
928, 520	AZ
712	IA
208	ID
218, 320	MN
406	MT
701	ND
402	NE
541	OR

