

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Telephone Number Portability)	
)	
)	CC Docket No. 95-116
CTIA Petitions for Declaratory Ruling on)	
Wireline-Wireless Porting Issues)	
)	
)	
)	

COMMENTS OF NENA

The National Emergency Number Association (“NENA”) supports the request of BellSouth Corporation for an extension of time to comment in the Further Notice of Proposed Rulemaking in the captioned proceeding.¹ We base our support on the following excerpt from the Further Notice, at ¶42:

We seek comment on the technical impediments associated with requiring wireless-to-wireline LNP when the location of the wireline facilities serving the customer requesting the port is not in the rate center where the wireless number is assigned. We seek comment on whether technical impediments exist to such an extent as to make wireless-to-wireline porting under such circumstances technically infeasible. Commenters that contend there are technical implications should specifically describe them, including any upgrades to switches, network facilities, or operational support systems that would be necessary.

Throughout the course of this proceeding, NENA has sought to describe and help resolve the technical problems for identifying and locating callers to 9-1-1 that arise when numbers are “ported” from a wire to a wireless carrier, or vice versa.² We have avoided commenting on the

¹ Memorandum Opinion and Order and Further Notice of Proposed Rulemaking (“Further Notice”), FCC 03-284, released November 10, 2003; 68 Fed.Reg. 68831, December 10, 2003.

² Ex parte communications, January 30, 2002 and May 1, 2002.

policy merits or the competitive implications of local number portability, and our intent remains the same. We wish to identify technical problems and potential solutions in connection with porting that crosses wire telephone rate center boundaries.

NENA's technical work involves input from several specific technical committees and working groups that are addressing wireless to wireline number portability issues that affect data and network elements as part of the overall E9-1-1 architecture.³ Because any conclusions reached and recommendations offered must be approved by a technical committee structure that brings to bear data transfer and networking, among other perspectives, these multiple reviews would be difficult to complete by the December 30th date falling between Christmas and New Years.

We therefore support the extension of time for opening comments to January 30, 2004. While this effectively would cancel the current reply deadline, there will be time enough later to determine the extent to which that deadline should also be enlarged. NENA will advise the Commission shortly after January 30th as to the state of its own work in relation to the reply round.

Respectfully submitted,

NENA

By _____

James R. Hobson
Miller & Van Eaton, P.L.L.C.
Suite 1000
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036-4320
(202) 785-0600

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ITS ATTORNEY

³ More information is available at <http://www.nena9-1-1.org/9-1-1TechStandards/data.htm>.