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February 10, 2004

VIA ECFS

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

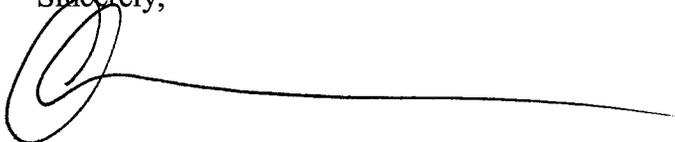
**Re: CC Docket No. 95-116, Local Number Portability/Petition of Puerto Rico
Telephone Company — Erratum.**

Dear Ms. Dortch:

In comments filed yesterday in the above-referenced matter on behalf of Centennial Communications Corp., page 7 contained an editorial error. Attached is a replacement page for page 7.

Please feel free to contact me with any questions about this matter.

Sincerely,



Christopher W. Savage
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Counsel for
CENTENNIAL COMMUNICATIONS CORP.

Rico?⁸

15. Centennial submits that the answer is “no.” Suppose that 1000 customers port wireless numbers to landline phones, and that each one receives inbound traffic of 500 minutes per year that “should be” toll. That’s 500,000 minutes of (intrastate) traffic a year on which PRTC would like to impose toll or access charges. If we assume intrastate access charges are approximately \$0.05 per minute (originating and terminating combined), then PRTC is asking this Commission to overrule competent state regulatory authorities, and disrupt the calling patterns and expectations of hundreds of thousands of customers to solve what is, at most, a \$25,000 problem. Centennial submits that there is no rational cost-benefit analysis that would justify indulging PRTC’s rating whims in these circumstances.

16. The essence of PRTC’s argument, in fact, is not that it cannot continue to rate calls to wireless numbers as “local” in an environment of pooling and intermodal portability. To the contrary, it states clearly that it can and will continue to rate and route calls to “native” wireless numbers as local in compliance with the Board’s ruling. *See* PRTC Petition at 4. PRTC’s real claim is that it will be technically unable to expand such arrangements to customers who port a wireline number to a wireless carrier, or who receive wireless service from a 1000s block within a “native” wireline NPA-XXX. This is, supposedly, discriminatory under federal law. *See* PRTC Petition at 9-11.

17. Centennial questions whether PRTC actually cannot configure its switches to

⁸ PRTC’s parent company, Verizon, recently agreed with Centennial in another filing within this same docket that there are only trivial amounts of wireless-to-wireline porting, and agreed also that there was no good reason for the Commission to devote its resources to “solving” the purported “problems” to which this unusual circumstance might give rise. *See* In the Matter of Telephone Number Portability, *Reply Comments of Verizon*, Docket No. 95-116 (filed February 4, 2004) at 1-2 (citing, with approval Centennial comments on the pending *Further Notice of Proposed Rulemaking* in this docket to the effect that wireless-to-wireline porting is essentially a non-issue and asserting that its information shows this situation to arise in less than 1% of all ports).