

April 23, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Notice of Ex Parte Presentation - CC Docket No. 95-116
Petitions for Extension of the LNP Deployment Deadline*

Dear Ms. Dortch:

This is to advise that on April 22, 2004, Michael F. Altschul of the Cellular Telecommunications & Internet Association ("CTIA"), Anne E. Hoskins of Verizon Wireless, and the undersigned on behalf of Dobson Communications Corporation met with the following staff of the Wireline Competition Bureau's Telecommunications Access Policy Division: Eric Einhorn, Chief; Cheryl Callahan, Assistant Chief; and Regina Brown; as well as Jennifer Salhus of the Wireless Telecommunications Bureau, Policy Division. The topic of the meeting was the pending petitions for waiver or extension of the Commission's May 24, 2004, deadline for implementation of local number portability ("LNP").

In the meeting, we argued that North-Eastern Pennsylvania Telephone Company's waiver petition should be denied, and that all such petitions should be held to the same high standard the Commission has applied to similar requests. We argued that the petitioners had not shown special circumstances justifying a waiver, and pointed out that the Commission has consistently held that the public interest benefits of LNP outweigh even substantial carrier cost and hardship in implementation. We also explained that waivers of the uniform LNP implementation schedule make it extremely difficult for wireless carriers to provide systems for their retail sales representatives to identify which prospective customers' numbers can be ported and which cannot. Finally, we urged the staff to clarify the requirement that all carriers are required to route calls properly to ported numbers, whether or not they are granted relief from the requirement actually to provide LNP. Just as wireline carriers must properly route calls to ported wireless numbers once wireless number portability is implemented, wireline carriers also must

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be able to support LNP for "Type 1" wireless numbers if these wireless numbers are to be portable.

Pursuant to the Commission's ex parte rules, this letter is being filed electronically in the above-referenced docket.

Sincerely,

/s/

L. Charles Keller

cc (via email): Eric Einhorn
Cheryl Callahan
Jennifer Salhus
Regina Brown