

April 29, 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 28, 2004, Michael F. Altschul and Diane Cornell 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 Consumer and Governmental Affairs Bureau: K. Dane Snowden, Chief; P. June Taylor, Chief of Staff; and Leon Jackler, Legal Counsel to the Bureau Chief. 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"), as well as general readiness issues associated with the May 24, 2004 LNP implementation deadline.

In the meeting, we argued 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 be able to support LNP for "Type 1" wireless numbers if these wireless numbers are to be portable.

WILKINSON ) BARKER ) KNAUER ) LLP

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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): K. Dane Snowden

P. June Taylor

Leon Jackler