

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

~~RECEIVED - FCC~~

~~JUN 22 2004~~

~~Federal Communication Commission
Bureau / Office~~

In the Matter of)
)
Telephone Number Portability)
)
Petition of Upper Peninsula Telephone Company for)
Extension of Time to Implement Local Number Portability)

CC Docket No. 95-116

RECEIVED

TO: Chief, Wireline Competition Bureau

JUL 26 2004

Federal Communications Commission
Office of the Secretary

PETITION FOR RECONSIDERATION

Upper Peninsula Telephone Company ("UPTC"), by its attorney and pursuant to Section 1.106 of the Commission's Rules, hereby petitions for reconsideration of the Order, DA-04-1456, released by the Wireline Competition Bureau ("Bureau") on May 24, 2004. The Bureau therein dismissed UPTC's April 16, 2004 "Petition for Extension of Time to Implement Local Number Portability" (attached as Exhibit 1) on procedural grounds without considering its merits.

The Bureau asserted that the reason for its dismissal was that UPTC's petition had been submitted less than 60 days in advance of UPTC's alleged local number portability ("LNP") "implementation date" in violation of Section 52.23(e) of the Commission's Rules. This determination was based upon the premise that UPTC had "received a request for LNP" on or before November 24, 2003 and that the applicable implementation date was May 24, 2004.

However, as detailed in its April 16, 2004 petition, UPTC had not received, as of November 24, 2003, a "specific request" for the provision of number portability in any of its switches, as required by Sections 52.23(b) and 52.23(c) of the Rules. Rather, UPTC had received only the form letter, dated November 18, 2003, from Verizon Wireless that was

attached to the April 16, 2004 petition. In that letter, Verizon Wireless had stated only that “the FCC has recently reiterated the pre-existing deadlines for local number porting for wireless and wireline carriers operating outside the Top 100 MSAs” and that “Verizon Wireless would like to begin to complete a Service Level Agreement (SLA) to ensure a smooth transition to number portability” or “obtain[] at minimum, a Trading Partner Profile (TPP).” Verizon Wireless did not identify, list or otherwise mention anywhere in its November 18, 2003 letter (or in the attachments thereto) a single specific UPTC switch or exchange in which Verizon Wireless was requesting LNP.

UPTC does not believe that the November 18, 2003 Verizon Wireless letter constituted the “specific request” for the provision of LNP in particular switches that is required by Sections 52.23(b) and 52.23(c) of the Rules, and that is necessary to establish the deployment deadlines set forth in those regulations. Therefore, although UPTC submitted its petition for extension out of an abundance of caution, it does not appear that the May 24, 2004 LNP implementation deadline was applicable to it.

Specifically, UPTC does not understand how the Commission could possibly and reasonably interpret Sections 52.23(b) and 52.23(c) of its Rules so as to establish and enforce LNP implementation deadlines for local exchange carriers (“LECs”) that have not received a “specific request” for the provision of LNP in particular switches. The Commission and other administrative agencies are bound by their own rules as long as they are in force, and may depart from them only by amending them. *U.S. v. Nixon*, 418 U.S. 683, 695-96 (1974); *Service v. Dulles*, 354 U.S. 363, 388 (1957). Section 52.23(b)(1) of the Rules makes it clear that LNP deployment requirements and deadlines are applicable initially in the 100 largest Metropolitan Statistical Areas (“MSAs”) only to “switches for which another carrier has made a specific

request for the provision of number portability.” After the initial deadlines, Section 52.23(b)(2) of the Rules provides for subsequent LNP deployment requirements and deadlines “in additional switches upon request.” For all other LECs, Section 52.23(c) of the Rules established post-January 1, 1999 LNP deployment requirements and deadlines “within six months after a specific request by another telecommunications carrier in areas where that telecommunications carrier is operating or plans to operate.” In paragraph 116 of *Telephone Number Portability*, First Memorandum Opinion And Order On Reconsideration, 12 FCC Rcd 7236 (1997), the Commission described the impact of its Section 52.23(c) requirement upon rural and other small LECs as follows:

116. If, however, a competitor is interested in number portability in a **particular switch** operated by a rural or smaller LEC, and the LEC cannot demonstrate extraordinary circumstances justifying an extension of our deployment requirements, and the state commission denies a Section 251(f)(2) request for suspension or modification, we find no statutory basis for excusing such a LEC from its obligations to provide number portability [emphasis added].

In the case of UPTC and other small LECs, the receipt of a specific request listing the particular switches in which LNP deployment is sought is not only required by the Commission’s Rules, but also is necessary for compliance planning and implementation. As detailed in its April 16, 2004 petition, UPTC operates nineteen switches and exchanges in the Upper Peninsula and the Lower Peninsula of Michigan. One of these exchanges – the Chester exchange in the Lower Peninsula – is UPTC’s largest exchange and is located within an area where wireless service is available. UPTC has already deployed LNP in its Chester exchange. However, UPTC’s other eighteen exchanges are not only smaller than the Chester exchange, but also some are located in areas with little or no wireless service, while others are located in areas where service is

acceptable along major highways but sporadic or uncertain the farther one gets from such highways. In order for UPTC to determine which of its switches need to be upgraded or replaced to provide LNP and to schedule such deployments, it needs to know the particular switches in which Verizon Wireless or other particular carriers are requesting LNP. Verizon Wireless has not provided this minimal information, and therefore should not be deemed to have made the requisite "specific request" to UPTC in its November 18, 2003 letter for the provision of LNP. In that event, the applicable implementation date pursuant to Section 52.23(c) of the Rules was **NOT** May 24, 2004.

Subsequent to November 24, 2003, UPTC has received only a single specific request for local number portability – namely, a request from T-Mobile USA, dated March 31, 2004 and received by UPTC on April 6, 2004 (attached as Exhibit 2), for deployment of LNP in UPTC's Amble, Michigan switch and exchange, which serves approximately 280 access lines. In addition, UPTC has received: (1) a letter, dated February 24, 2004 and received March 2, 2004, from Sprint PCS (attached as Exhibit 3) asking UPTC to complete a "Trading Partner Profile" but not identifying, listing or otherwise mentioning a single specific UPTC switch or exchange in which Sprint PCS is requesting LNP; and (2) an email from ALLTEL on May 12, 2004 (attached as Exhibit 4) requesting UPTC to complete trading partner profiles but also not identifying, listing or otherwise mentioning a single specific UPTC switch or exchange in which ALLTEL is requesting LNP.

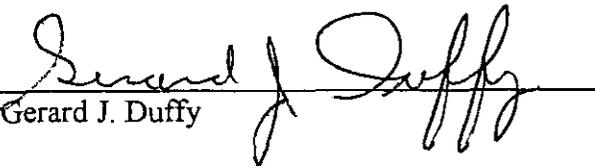
Pursuant to Sections 52.23(c) and 52.23(e) of the Rules, UPTC has until September 30, 2004, to implement LNP in its Amble, Michigan exchange in response to T-Mobile USA's request; and until July 30, 2004, to petition for extension of that deadline. UPTC hereby revises the proposed switch replacement and LNP deployment schedule on page 8 of its April 16, 2004 petition (attached as Exhibit 1) to move its Amble exchange into the initial group of switches to be replaced during the First Quarter of 2005 in order to more rapidly respond to T-Mobile USA's request, and to place Grace Harbor into the group of switches to be replaced during the Fourth Quarter of 2006. Hence UPTC is requesting an extension until March 31, 2005, to implement LNP in its Amble, Michigan exchange.

As regards the Sprint PCS and ALLTEL communications that did not identify specific UPTC switches or exchanges in which LNP is requested, UPTC does not believe that they comply with Section 52.23(c) or initiate any LNP implementation obligations or compliance periods. *Tech
Part
P. 11/10*

UPTC's April 16, 2004 petition should not have been dismissed on the grounds that it was submitted less than 60 days in advance of an erroneously presumed May 24, 2004 LNP implementation deadline. Instead, neither Verizon Wireless nor any other carrier submitted prior to November 24, 2003, the requisite "specific request" for the deployment of LNP in particular switches that was required by Section 52.23(c) of the Rules for activation of a May 24, 2004 implementation deadline. Rather, the only LNP implementation deadline applicable to UPTC is the September 30, 2004 deadline for implementation of LNP in its Amble, Michigan switch pursuant to the specific request from T-Mobile USA.

The Bureau is therefore requested: (a) to reconsider its dismissal of UPTC's April 16, 2004 petition; (b) to grant UPTC an extension until March 31, 2005 to implement LNP in its Amble, Michigan exchange, for the reasons set forth in the April 16, 2004 petition; and (c) to allow UPTC to employ the switch upgrade schedule proposed in its April 16, 2004 petition (as revised herein to reschedule the Amble and Grace Harbor switch replacements) to respond to future specific requests for LNP (again, for the reasons set forth in the April 16, 2004 petition).

Respectfully submitted,
UPPER PENINSULA TELEPHONE COMPANY

By 
Gerard J. Duffy

Its Attorney

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Dated: June 22, 2004

EXHIBIT 1

4853

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APR 16 2004

Federal Communication Commission
Bureau / Office

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIPT

CC Docket No. 95-116

In the Matter of)
)
TELEPHONE NUMBER PORTABILITY)
)
UPPER PENINSULA TELEPHONE COMPANY)
)
Request pursuant to Rule Section 52.23(e) for)
extension of time for completion of implementation)
of local number portability in rural local exchange)
carrier network)

TO: Chief, Wireline Competition Bureau

PETITION FOR EXTENSION OF TIME
TO IMPLEMENT LOCAL NUMBER PORTABILITY

Upper Peninsula Telephone Company ("UPTC"), by its attorney and pursuant to Section 52.23(e) of the Commission's Rules, hereby requests extensions of time to implement local number portability ("LNP") in eighteen (18) of the nineteen (19) rural telephone exchanges in its network. The extensions are necessary because the eighteen UPTC exchanges are currently served by vintage REDCOM MDX switches that are not LNP-capable, and that consequently must be replaced. As shown on the following table, the eighteen non-LNP-capable exchanges include 14 exchanges with less than 500 access lines:

Exchanges with greater than 1,000 access lines	1
Exchanges with 500 to 1,000 access lines	3
Exchanges with 250 to 500 access lines	5
Exchanges with 100 to 250 access lines	6
Exchanges with less than 100 access lines	3

Upper Peninsula Telephone Company

UPTC is a rural telephone company that serves nineteen local exchanges (approximately 7,500 total access lines) in northern Michigan. The UPTC network currently is 19 discrete exchanges (i.e., there is no "network" between these exchanges, per se). UPTC connects to the RBOC at a local point-of-interface specific to each exchange. Its service area encompasses approximately 2,995 square miles, and includes rural communities scattered throughout the Upper Peninsula of Michigan (in Baraga, Chippewa, Dickinson, Gogebic, Houghton, Iron, Luce, Mackinac, Marquette, Menominee, and Ontonagon counties), as well as rural communities in northern Michigan below the Straits of Mackinac (in Crawford, Kalkaska, Mecosta, Montcalm, Otsego, and Presque Isle counties). UPTC's largest exchange is its Chester exchange (approximately 1,285 access lines), located near Johannesburg in Otsego and Crawford counties in Michigan. UPTC's average exchange size is slightly less than 400 access lines.

UPTC has been an operating local exchange carrier since 1927. It currently has 37 full-time employees, including three central office technicians and eleven outside plant, construction or installation/maintenance technical personnel.

In 2002, UPTC began a comprehensive planning process to consider the switching and outside plant needs of the company for the next five to ten years. Included in the analysis were short-term needs as well as a long-term plan to upgrade or replace the REDCOM MDX switches that it had been using for its exchanges since the late 1980s and early 1990s. It hired a consulting engineering firm, Kadrmas, Lee & Jackson, Inc. ("KLJ"), to prepare an engineering design and a strategic capital expenditure plan to replace all nineteen REDCOM MDX switches. The plan, which was delivered in 2002, called for the replacement of UPTC's switches over a five-to-seven year period, starting with the larger exchanges. UPTC's eighteen REDCOM

switches cannot be replaced within a significantly shorter period because: (1) UPTC cannot reasonably bear or justify the substantial capital expenditures (which can exceed \$1 million per exchange) to replace all nineteen of its switches at the same time; (2) UPTC needs substantial time to apply for and obtain Rural Utilities Service ("RUS") or other affordable loan financing for its switch replacements; (3) UPTC cannot hope to order and obtain delivery of eighteen new switches from its vendor or vendors within a brief period; and (4) UPTC does not have sufficient technical personnel to install, test, de-bug and cut-over more than four or five new switches per year without adversely impacting the quality of the service provided to its customers.

In 2003, UPTC commenced the first phase of its switch replacement program by replacing the REDCOM MDX switch at its Chester exchange (approximately 1,285 access lines) with a Siemens EWSD Class 5 switch. In addition to the \$899,274 cost of the switch replacement, UPTC spent an additional \$282,617 to install Next Generation Digital Loop Carriers (DLCs) in its Chester exchange. As a result of these upgrades, UPTC's largest exchange is currently LNP-capable.

The second phase of the program was originally scheduled to include replacement of the switches of UPTC's Carney, Faithorn, Grace Harbor, Rexton and Wallace exchanges during 2004. The switch replacement for the Carney exchange alone (approximately 956 access lines) was projected to cost \$1.14 million, plus another \$188,741 for Next Generation DLCs. However, as indicated below, the second phase has been impacted by LNP requirements and technology changes.

On or about November 18, 2003, UPTC received the attached form letter from Verizon Wireless which indicated that "the FCC has recently reiterated the pre-existing deadlines for local number porting for wireless and wireline carriers operating outside the Top 100 MSAs" and

that "Verizon Wireless would like to begin to complete a Service Level Agreement (SLA) to ensure a smooth transition to number portability." Neither the Verizon Wireless letter nor the attachments thereto provide any indication as to the particular UPTC exchanges, if any, in which Verizon Wireless is requesting LNP. To the best of UPTC's knowledge, information and belief, Verizon Wireless currently provides wireless service only in a portion of UPTC's exchanges in the Upper Peninsula of Michigan. Wireless service in the Upper Peninsula is not very prevalent at this time.

The November 18, 2003 letter from Verizon Wireless is the only communication that UPTC has received from a wireless or wireline carrier relating to LNP. UPTC does not believe that the Verizon Wireless letter constitutes a "bona fide request" for LNP because it does not identify in which (if any) of UPTC's nineteen exchanges Verizon Wireless desires number porting. However, out of an abundance of caution, UPTC is submitting this extension petition in case the Commission determines that the non-specific Verizon Wireless form letter constitutes a "bona fide request" for LNP in one or more of UPTC's eighteen REDCOM-equipped exchanges.

UPTC is ready and able to port numbers from its LNP-capable Chester exchange to Verizon Wireless and other carriers as of May 24, 2004. Because Chester is its largest exchange and because Chester is located in the Lower Peninsula where wireless service is more readily available, UPTC expects that the largest portion of any demand for the porting of numbers to other carriers will be found in Chester.

However, the REDCOM MDX switches in UPTC's eighteen other exchanges do not have the requisite hardware and software, nor adequate processing power and memory, to provide the Signaling System Seven ("SS7") functionality and related database system connectivity needed for LNP. Moreover, REDCOM does not appear to have available relatively

straightforward and economical upgrades to provide LNP capability. Rather, UPTC's existing REDCOM MDX switches must be substantially replaced by newer REDCOM MDX-I switches, or switches from another vendor. Therefore, UPTC is requesting an extension of time to allow it to replace the eighteen switches in an orderly and financially reasonable manner.

UPTC Is Unable To Meet The Commission's Deployment Schedule

The simple fact is that UPTC's eighteen existing REDCOM MDX switches are not LNP-capable, and cannot be made LNP-capable by any readily available software upgrade or patch. These are older switches that have been in service for over ten years, and that lack the hardware, software, processing power and memory to accommodate the SS7 functionality and database connectivity needed for LNP. Rather, all eighteen switches must be replaced.

This switch replacement cannot be accomplished within the six months afforded by Section 52.23(c) of the Rules. A rural telephone company like UPTC cannot select, finance, order, obtain delivery, install, de-bug and cut-over eighteen new switches within six months. Even in the unlikely event that lenders and vendors give the project their top priority, such a major undertaking requires several years of careful planning and execution by a rural telephone company with three central office technicians (and fourteen technical personnel overall) to avoid major service outages and disruptions.

Activities Undertaken By UPTC To Meet Implementation Schedule

In November 2003, UPTC requested bids for replacement switches for its Carney, Faithorn, Grace Harbor, Rexton and Wallace exchanges. Nortel chose not to bid. UPTC received bids from Siemens, and from three softswitch vendors (CopperCom, Taqua and

Santera). These bids were opened on December 16, 2003, and were given to the KLJ engineers for evaluation.

Due to the rapidly changing switching technology, the company determined that it was important to consider Next Generation softswitches when making long-term switching investments rather than just continue installing the "legacy" type of switch that had been installed in Chester in 2003 (and which had been planned to be installed at the other locations). In light of ongoing technology changes and industry trends, softswitches may meet UPTC's service needs more efficiently and effectively than traditional circuit switches. At the same time, UPTC must make sure that any softswitches it selects meet RUS specifications so that it can obtain RUS financing.

In March 2004, UPTC representatives and engineering consultants visited two of the softswitch vendors who had provided bids in December 2003. Currently, UPTC's consulting engineers are preparing an alternative engineering plan, comparing softswitch features and costs, and seeking additional information regarding specific concerns. If, after completing this analysis, the engineers recommend replacement of the REDCOM MDX switches with softswitches, UPTC will need to obtain RUS approval before proceeding with its order.

Particular Switches for which Extension is Requested

UPTC is requesting extensions for its REDCOM MDX switches at the following eighteen exchanges:

<u>Exchange</u>	<u>CLLI Code</u>	<u>Approximate Number of Access Lines</u>
Amble	AMBLMIXJDSO	280
Carney	CRNYMIXJDSO	956
Donken	DNKNMIXIDSO	423
Drummond Island	DRISMIXIDSO	1,142

<u>Exchange</u>	<u>CLLI Code</u>	<u>Approximate Number of Access Lines</u>
Faithorn	FTHRMIXISGO	133
Felch	FLCHMIXIDSO	745
Fence River	FNRVMIXIDSO	102
Grace Harbor	GRHRMIXIDSO	182
Lake Gogebic	LKGOMICISGO	310
Manistee River	MVRMIXIDSO	66
Marenisco	MRNSMIXIDSO	289
Michigamme Forest	MHGFMIXIDSO	108
North Land O Lakes	NLNDMIXIDSO	429
Rexton	RXTNMIXIDSO	154
Scott Point	SCPTMIXIDSO	37
Smoky Lake	MIYEMIXJRSO	78
Wallace	WLLCMIXADSO	616
Watson	WTMQMIXIDSO	196

Time Within Which UPTC Will Complete Deployment

UPTC expects to receive KLJ's revised engineering evaluation within the next few weeks, and to select a switch vendor very shortly thereafter. Whether UPTC opts to continue installing Siemens circuit switches or to install new softswitches, it believes that it will be able to obtain, install and cut-over new switches for approximately four or five exchanges every nine-to-twelve months. Hence, assuming relatively prompt RUS approval of its loan applications, UPTC expects that it will take from 40 to 50 months to replace all eighteen of its REDCOM switches.

UPTC has explored the consolidation of the switches for its nineteen exchanges. However, because these exchanges are scattered throughout northern Michigan, it has never previously been determined to be feasible or economical to consolidate switching facilities. Hence, at present, it appears that all eighteen REDCOM switches will have to be replaced.

Proposed Schedule With Milestones

UPTC will minimize inconvenience to other carriers and to customers desiring to port their numbers by replacing the switches in its larger exchanges first, once the previously scheduled second phase of its switch replacement project is completed. Assuming prompt RUS approval, its proposed switch replacement schedule is as follows:

<u>Exchange</u>	<u>Scheduled Completion of Switch Replacement</u>
Carney (956 access lines)	1 st Quarter 2005
Wallace (616 access lines)	1 st Quarter 2005
Grace Harbor (182 access lines)	1 st Quarter 2005
Rexton (154 access lines)	1 st Quarter 2005
Faithorn (133 access lines)	1 st Quarter 2005
Drummond Island (1,142 access lines)	4 th Quarter 2005
Felch (745 access lines)	4 th Quarter 2005
Watson (196 access lines- do with Felch)	4 th Quarter 2005
Donken (423 access lines)	4 th Quarter 2006
Amble (280 access lines)	4 th Quarter 2006
Fence River (102 access lines)	4 th Quarter 2006
Michigamme Forest (108 access lines)	4 th Quarter 2006
Manistee River (66 access lines)	4 th Quarter 2006
Lake Gogebic (310 access lines)	4 th Quarter 2007
Marenisco (289 access lines – do with Lake Gogebic)	4 th Quarter 2007
North Land O Lakes (429 access lines)	4 th Quarter 2007
Smoky Lake (78 access lines – do with North Land O Lakes)	4 th Quarter 2007
Scott Point (37 access lines)	4 th Quarter 2007

Conclusion

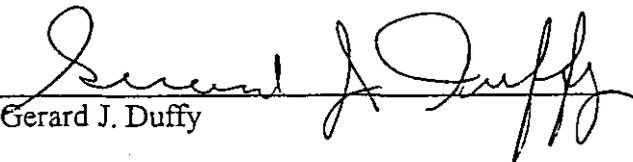
Because its eighteen existing REDCOM MDX switches are not LNP-capable and must be replaced, UPTC requests extensions of time to implement LNP in eighteen (18) of its nineteen (19) rural telephone exchanges. UPTC has acted diligently to develop a switch replacement plan and schedule, but needs the requested additional time to select, finance, order, obtain delivery, install, de-bug and cut-over eighteen new switches. This is a prodigious task for a small

company that serves only 7,500 total access lines scattered over a non-contiguous 2,995 square mile service area, and that has only fourteen technical personnel (including only three central office technicians). It simply cannot be accomplished in six months or even twelve months, but rather will take 40 to 50 months to complete in an orderly and reasonable fashion without disrupting or degrading the service provided to UPTC's rural customers.

Even if Verizon Wireless has in fact requested LNP in some unspecified UPTC exchanges, it will not be injured by the requested extension. Verizon Wireless will be able to obtain number porting in UPTC's largest exchange (Chester) as of May 24, 2004, and has not identified the other UPTC exchanges (if any) in which it desires LNP. Given that Verizon Wireless does not currently provide wireless service in substantial portions of Michigan's Upper Peninsula, it appears that it will not need LNP in a significant number of UPTC's exchanges during the next few years.

Hence, the Commission is respectfully requested to grant the requested extensions, and to allow UPTC to provide LNP as its REDCOM MTX switches are replaced according to the schedule on Page 8 of this petition.

Respectfully submitted,
UPPER PENINSULA TELEPHONE COMPANY

By 
Gerard J. Duffy

Its Attorney

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E-mail: gjd@bloostonlaw.com
Dated: April 16, 2004

Interconnection/Numbering/Mandates



Verizon Wireless
2785 Mitchell Drive MS 7-1
Walnut Creek, CA 94598

November 18, 2003

IMMEDIATE ATTENTION REQUESTED

Upper Peninsula Telephone Co.
397 U.S. Hwy. 41 N
Carney, MI 49812

Re: Local Number Portability

Dear G. Matthews:

The FCC has recently reiterated the pre-existing deadlines for local number porting for wireless and wireline carriers operating outside the Top 100 MSAs, effective May 24, 2004. Verizon Wireless Cellco Partnership d/b/a Verizon Wireless would like to begin to complete a Service Level Agreement (SLA) to ensure a smooth transition to number portability by establishing procedures to govern the exchange of information during the porting process. Specifically, an SLA would serve several purposes: memorialize the intercarrier communications processes that the two carriers intend to follow, capture appropriate porting center and trouble contacts, and contain the parties' agreement to successfully facilitate porting customers. If you have not already received a copy of our SLA, you can obtain one by contacting Sharon Cañas at 925-279-6122 or email Sharon.Canas@VerizonWireless.com.

If negotiating an SLA is not possible in the next few weeks before the LNP deadline, Verizon Wireless's immediate concern is in obtaining, at minimum, a Trading Partner Profile (TPP). The TPP would provide basic factual information necessary to accomplish portability and would include those entities covered by the profile and any back-office or porting center contacts. Verizon Wireless plans to integrate this information into its information systems and also provide it to personnel staffing our porting center. Whether or not an SLA is ultimately executed, sharing this type of factual information is necessary to facilitate porting as well as fallout resolution. In this regard, we have enclosed a copy of the TPP with appropriate contact information.

Please include a response to this request along with a point of contact for provision of TPP information and/or SLA discussions in a letter or email addressed to the undersigned. Thank you for your immediate attention and cooperation.

A handwritten signature in cursive script, appearing to read "Linda Godfrey".
Linda Godfrey

Member of Technical Staff
Interconnection Numbering and Mandates
Headquarters Network Operations Staff

Enclosure

#72173v2 - 10/24/03

WIRELINE TRADING PARTNER PROFILE

Table of Contents

Part A - Trading Partner Profile

Part B - General Contact Information and Trouble Reporting Contact Information

Part C - Trouble Ticket Detail

Part D - Porting Validation Standards

Part E - Affiliate Lists

Part A
Trading Partner Profile

For Verizon Wireless:

Company Name – Verizon Wireless (Verizon Wireless Affiliates are identified in Part E hereto)
Administrative OCN – G056

**OCN LIST FOR VERIZON
WIRELESS**

STATE	OCN	STATE	OCN
AL	6804	MT	6564
AR	6805	NE	5807
AZ	6572	NC	6324
CA	6006	ND	6568
CO	6567	NH	6386
CT	6388	NV	6458
DC	6402	NJ	6391
DE	6393	NY	6959
FL	6502	NM	6573
GA	6540	OH	6025
HI	6516	OK	5813
IA	6570	OR	6523
ID	6565	PA	6392
IL	6333	RI	6389
IN	6725	SC	6398
KS	6532	SD	6569
KY	6500	TN	6673
LA	6505	TX	6506
ME	6386	UT	6571
MA	6387	VA	6827
MD	6395	VT	6390
MS	6396	WV	6394
MO	5814	WA	6246
MN	5816	WI	6508
MI	6003	WY	6566

Verizon Wireless Service Order Activation System SPID – 6006
 Verizon Wireless Local Service Management System SPID – 0572, 6827

Address – Port Center
 300 River Rock Blvd.
 Murfreesboro, TN 37128
 Country – USA

For Wireline Carrier B
 Company Name: [Wireline Carrier B to provide list of Affiliates on Part B]
 [Wireline Carrier B to insert OCNs with associated state here and to complete items on the 419.6.0.0.1]
 Address: [insert address]
 [insert address]
 Country: USA

Item	Verizon Wireless	Wireline Carrier B
Effective Date		
Note: The above contact is also assumed to be the first point of contact for profile changes.		
Contact name for Wireline Carriers	Verizon Wireless Port Center	
Contact description	Port Center – General Information	
Phone number	800-488-2002 (not available until 11/24/03)	
	1800-488-2002	

Item	Verizon Wireless	Wireline Carrier B
... Common information for testing and production environments ...		
Administrative OCN	G056	
Administrative Authorized Exchange Carrier Name (if applicable)	EBAW	
Holiday Days (List Days)	N/A	
Holiday time begin (hh:mm)	N/A	
Holiday time end (hh:mm)	N/A	
... for Testing ...		

Service Provider SOA ID (SPID)	6006	
LSMS SPID	0572, 6827	
WPR / LSR Version ID	Preference to latest industry-supported version. WPR is for WLS-WLN porting, LSR is for WLN-WLS.	
WPRR / FOC Version ID	Preference to latest industry-supported version.	
Time Zone (PST, MST, CST, EST)	Coordinated per Time Zone, per contact information in Part B.	
Business days (Sun, Mon, etc.)	Testing to be coordinated per contact information in Part B	
Business day begin (hh:mm)	Testing to be coordinated per contact information in Part B	
Business day end (hh:mm)	Testing to be coordinated per contact information in Part B	
... for Production ...		
Service Provider SOA ID (Verizon Wireless SPID)	6006	
LSMS SPID	0572, 6827	
WPR / LSR Version ID	LSOG (most current version) WPR is for WLS-WLN porting, LSR is for WLN-WLS.	
WPRR / FOC Version ID	LSOG (most current version)	
Time Zone (PST, MST, CST, EST)	24x7x365	
Business days (Sun, Mon, etc.)	24x7x365	
Business day begin (hh:mm)		
Business day end (hh:mm)		

C	Item	Verizon Wireless	Wireline Carrier B
O	... for Testing ...		
R	Porting Method: Primary,	Current, Test Env = Telcordia	
B	Secondary, N/A	SMG 4.2.0.50 (WICIS 2.x)	
A	ICP Package/Application ("send to")	SMG 4.2: 205.174.188.227	
	ICP Physical Server ("receive from")	SMG 4.2: 205.174.188.229	
	Failover ICP Server	SMG 4.2: 205.174.188.228	
	SOA Application	SMG 4.2: 205.174.188.226	

SOA Server	SMG 4.2: 205.174.188.229	
Failover SOA Server	SMG 4.2: 205.174.188.229	
Application Port Information	Test Env 2 = 26233	
Naming Service / IOR	Static IP (or N/A)	
DLCI (Frame Relay usage)	N/A	
LDAP Provider	N/A	
Security Requirements	N/A	
Firewall Requirements	Allow TCP and UDP traffic	
SSL Requirements	N/A	
Proprietary Requirements	N/A	
Service IDL version	N/A	
Implementation OMG standard compliant?	Yes	
... for Testing OMG CORBA Standards Supported ...		
Verizon Wireless		Wireline Carrier B
Vendor	Borland	Vendor
Verizon Wireless Product Name/Version	CORBA	Wireline Product Name/Version
OMG CORBA Version	Corba IDL 2.1	OMG CORBA Version
IPOP Version		
... for Production ...		
Porting Method: Primary, Secondary, N/A	Current Production = SMG 4.2	
ICP Package/Application ("send to")	SMG 4.2: 205.140.9.27 205.140.9.29	
ICP Physical Server ("receive from")	SMG 4.2: 205.140.9.17 205.140.9.19	
Failover ICP Server	SMG 4.2: 205.140.9.16 205.140.9.18	
SOA Application	SMG 4.2: 205.140.9.26 205.140.9.28	
SOA Server	SMG 4.2: 205.140.9.16 205.140.9.18	
Failover SOA Server	SMG 4.2: 205.140.9.17 205.140.9.19	
Application Port Information	26232 (setup as "2" + SPID)	
Naming Service / IOR	Static IP (or N/A)	
DLCI (Frame Relay usage)	N/A	
LDAP Provider	N/A	
Security Requirements	N/A	
Security Requirements	N/A	

Firewall Requirements	Allow TCP and UDP traffic	
SSL Requirements	N/A	
Proprietary Requirements	N/A	
Service IDL version	N/A	
Implementation OMG standard compliant?	Yes	
... for Production OMG CORBA Standards Supported ...		
Verizon Wireless		Wireline Carrier B
Vendor	Borland	Vendor
Verizon Wireless Product Name/Version	CORBA	Wireline Product Name/Version
OMG CORBA Version	Corba IDL 2.1	OMG CORBA Version

Item	Verizon Wireless	Wireline Carrier B
... for Testing ...		
F A X	Porting Method: Primary, Secondary, Low Tech Interface, LTI	
	Fax number (machine printed forms)	1-813-209-5983
	Fax number (hand printed forms)	1-813-209-5982
... for Production ...		
Porting Method: Primary, Secondary, N/A		
FAX number (machine printed forms)	1-813-739-6201	
FAX (hand printed forms)	1-813-739-6202	
NOTE: When responding to one of our port request, please respond to the "Return Fax Number" indicated on the port request.		

Item	Verizon Wireless	Wireline Carrier B
... for Testing ...		
E D I	Porting Method: Primary, Secondary, Low Tech Interface (LTI)	
	Specific EDI Requirements	N/A
... for Production ...		
	Porting Method: Primary, Secondary, N/A	
	Specific EDI Requirements	N/A

O T H E R	Item	Verizon Wireless	Wireline Carrier B
	... for Testing ...		
	Porting Method: Primary, Secondary, N/A		
	Other Communication Requirements		
	... for Production ...		
	Porting Method: Primary, Secondary, N/A		
	Other Communication Requirements		

The carriers agree that information contained in this Part A is operational in nature and subject to change.

The carriers agree to make every effort to give the other carrier thirty (30) days' notice of any changes to its information pursuant to the General Contact Information set forth in Part A.

The carriers' contact information contained in this Trading Partner Profile is for the sole purpose of carrier-to-carrier communication and not for distribution to customers and/or end users.

Part B – General Contact Information and Trouble Reporting Contact Information

For Verizon Wireless:

General Contact Information

Wireless-Wireline Porting:

Verizon Wireless Porting Center

Hours of Operation: 24 x 7 x 365 (open all holiday's, no exceptions)
Address: 300 River Rock Blvd.
Murfreesboro, TN 37128
Phone: 1-800-488-2002

Porting Center Carrier Relations

Contact: Associate Director of Inter-Carrier Relations
Phone: 1-800-711-9300
Fax: 1-615-372-2411
Hours: 8:00am to 5:00pm (Central Time)
E-mail: PortCenterICR@GL.VerizonWireless.com

Pre-Launch (Pre-11/24/03) Inter-Carrier Test Scheduling

Contact: Wireline Inter-Carrier Test Coordinator
Phone: 1-248-915-3430
Fax: 1-248-915-3799
E-mail: Marie.Moore@VerizonWireless.com

Post-Launch (Post-11/24/03) Inter-Carrier Test Scheduling

Contact: Inter-Carrier Relations
Phone: 1-800-711-9300
Fax: 1-615-372-2411
E-mail: PortCenterICR@GL.VerizonWireless.com

Trouble Reporting Contact Information

Process: The Verizon Wireless Porting Center is the initial interface for all trouble resolution activity associated with porting numbers. The Porting Center will refer issues to the appropriate internal Network or provisioning group for resolution within Verizon Wireless.

Trouble Area:

ICP/General Trouble Reporting

Phone: 1-800-711-9300
Fax: 1-615-372-2425
E-mail: YZWLNPGeneral@GL.VerizonWireless.com

Disaster Recovery

Contact: Porting Center Resource Manager
Phone: 1-800-711-9300
Fax: 1-615-372-2425
E-mail: PCLNPTNC@GL.VerizonWireless.com

CORBA:

Contact: TSI Hotline
Phone: 1-800-892-2888
Fax: 1-813-273-3164
E-mail: Hotline@tsiconnections.com; Subject: Customer#: WLNP

For Wireline Carrier B:

General Contact Information

[contact]

Hours of Operation:

Address:

[contact]

Phone:

Fax:

Trouble Reporting Contact Information

Trouble Area:

ICP/General Trouble Reporting

Phone:

Fax:

E-mail:

Disaster Recovery

Contact:

Phone:

Fax:

E-mail:

CORBA:

Contact:

Phone:

Fax:

E-mail:

Note: Each carrier shall make available a Porting Administration Group or Trouble Reporting contact on a 24x7x365 basis.

The Trouble Reporting Contacts may be amended from time to time by a carrier upon providing thirty (30) days' written notice to the other at the General Contact Information set forth in this Part A.

The carriers' contact information contained in this Trading Partner Profile is for the sole purpose of carrier-to-carrier communication and not for distribution to customers and/or end users.

Part C – Trouble Ticket Detail

For Verizon Wireless:

Information Required For Logging Trouble Tickets*

The following may be required for trouble reports:

- Carrier Name;
- Reporting Carrier organization;
- SPID and associated OCN(s);
- Point of Contact Name;
- Point of Contact Number;
- Porting Telephone Number/MDN;
- LRN;
- Time and Date of Port;
- Associated Error Codes;
- Description of Problem; and
- Other relevant data.

For Wireline Carrier B:

Information Required For Logging Trouble Tickets*

The following is proposed information for trouble reports:

- Carrier Name;
- Reporting Carrier organization;
- SPID and associated OCN(s);
- Point of Contact Name;
- Point of Contact Number;
- Porting Telephone Number/MDN;
- LRN;
- Time and Date of Port;
- Associated Error Codes;
- Description of Problem; and
- Other relevant data.

*Each carrier shall make available a Porting Administration Group or Trouble Reporting contact on a 24x7x365 basis.

The carriers contact information contained in this Trading Partner Profile is for the sole purpose of carrier-to-carrier communication and not for distribution to customers and/or end users.

Part D – Porting Validation Standards**For Verizon Wireless:****Information Required For Post-Paid Port Validation:**

1. Billing Last Name
2. Business Name if no information for Billing Name
3. Five Digit Zip Code
4. SSN/Tax ID Number
5. Account Number if no SSN or Tax ID
6. Porting Telephone Number

Information Required for Pre-Paid Port Validation:

1. Porting Telephone Number
2. Password/PIN

For Wireline Carrier B:**Information Required For Post-Paid Port Validation:****Information Required for Pre-Paid Port Validation:**

Note: Other than those mandatory data items set forth in Section 3.3.1 of the WICIS, the above shall be the only information which may be utilized by a carrier to this Trading Partner Profile to validate a port request for post-paid numbers. "Delay" or "denial" of ports between the carriers shall occur only in the event a carrier is unable to complete the validation of those validation elements expressly set forth above. Once validated, the Carriers shall be obligated to complete the porting transaction. Any variations or proposed changes in the agreed data fields noted above shall be communicated to the other carrier at the information provided in Part B.

Part E – Affiliate Lists**For Verizon Wireless:**

Allentown SMSA Limited Partnership d/b/a Verizon Wireless
By Bell Atlantic Mobile Systems of Allentown, Inc., Its General Partner

Anderson CellTelCo d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Athens Cellular, Inc. d/b/a Verizon Wireless

Badlands Cellular of North Dakota Limited Partnership d/b/a Verizon Wireless
By: CommNet Cellular Inc., Its Managing Agent

Bell Atlantic Mobile of Asheville, Inc. d/b/a Verizon Wireless

Bell Atlantic Mobile of Rochester, LP d/b/a Verizon Wireless
By Upstate Cellular Network, Its General Partner
By Cellco Partnership, Its General Partner

Binghamton MSA Limited Partnership d/b/a Verizon Wireless
By NYNEX Mobile of New York Limited Partnership, Its General Partner
By Upstate Cellular Network, Its General Partner
By Cellco Partnership, Its General Partner

Bismarck MSA Limited Partnership d/b/a Verizon Wireless
By Cellular Inc. Network Corporation, Its General Partner

Boise City MSA Limited Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

California RSA No. 4 Limited Partnership d/b/a Verizon Wireless
By Pinnacles Cellular, Inc., Its General Partner

Cellco Partnership d/b/a Verizon Wireless

Cellular Inc. Network Corporation d/b/a Verizon Wireless

Chicago 10 MHz LLC d/b/a Verizon Wireless
By Cellco Partnership, Its Sole Member

Chicago SMSA LP d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Colorado 7 – Saguache Limited Partnership d/b/a Verizon Wireless
By: CommNet Cellular Inc., Its Managing Agent

Colorado RSA No. 3 Limited Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

CommNet Cellular License Holding LLC d/b/a Verizon Wireless
By Cellular Inc. Financial Corporation, Its Sole Member

CyberTel Cellular Telephone Company d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Dallas MTA, LP d/b/a Verizon Wireless
By Verizon Wireless Texas, LLC, Its General Partner

Danville Cellular Telephone Company Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Des Moines MSA General Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

Dubuque MSA Limited Partnership d/b/a Verizon Wireless
By Southwestco Wireless, LP, Its General Partner
By Southwestco Wireless, Inc., Its General Partner

Duluth MSA Limited Partnership d/b/a Verizon Wireless
By AirTouch Minnesota, LLC, Its General Partner
By Celco Partnership, Its Sole Member

Eastern South Dakota Cellular, Inc. d/b/a Verizon Wireless
Fayetteville Cellular Telephone Company Limited Partnership d/b/a Verizon Wireless
By Celco Partnership, Its General Partner

Fresno MSA Limited Partnership d/b/a Verizon Wireless
By Celco Partnership, Its General Partner

Gadsden CellTelCo Partnership d/b/a Verizon Wireless
By Celco Partnership, Its General Partner

Gila River Cellular General Partnership d/b/a Verizon Wireless
By Celco Partnership, Its Managing General Partner

Gold Creek Cellular of Montana Limited Partnership d/b/a Verizon Wireless
By Cellular Inc. Network Corporation, Its General Partner

Grays Harbor-Mason Cellular Limited Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless
By Celco Partnership, Its General Partner

GTE Mobilnet of Florence, Alabama Incorporated d/b/a Verizon Wireless
GTE Mobilnet of Fort Wayne Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

GTE Mobilnet of Indiana Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

GTE Mobilnet of Indiana RSA #3 Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

GTE Mobilnet of Indiana RSA #6 Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

GTE Mobilnet of Santa Barbara Limited Partnership d/b/a Verizon Wireless
By Celco Partnership, Its General Partner

GTE Mobilnet of South Texas Limited Partnership d/b/a Verizon Wireless
By San Antonio MTA LP, Its General Partner
By Verizon Wireless Texas, LLC, Its General Partner

GTE Mobilnet of Terre Haute Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

GTE Mobilnet of Texas RSA #17 Limited Partnership d/b/a Verizon Wireless
By San Antonio MTA LP, Its General Partner
By Verizon Wireless Texas, LLC, Its General Partner

GTE Mobilnet of Texas RSA #21 Limited Partnership d/b/a Verizon Wireless
By San Antonio MTA LP, Its General Partner
By Verizon Wireless Texas, LLC, Its General Partner

GTE Mobilnet of the Southwest LLC d/b/a Verizon Wireless
By Celco Partnership, Its Sole Member

GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless
Hamilton Cellular Telephone Company d/b/a Verizon Wireless
By New Par, Its General Partner
By Verizon Wireless (VAW) LLC, Its General Partner

Idaho 6 - Clark Limited Partnership d/b/a Verizon Wireless
By: CommNet Cellular Inc., Its Managing Agent

Idaho RSA No. 1 Limited Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

Idaho RSA No. 2 Limited Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

Idaho RSA 3 Limited Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

Illinois RSA 1 Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

Illinois RSA 6 and 7 Limited Partnership d/b/a Verizon Wireless
By Illinois SMSA Limited Partnership, Its General Partner
By Cellco Partnership, Its General Partner

Illinois SMSA Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Indiana RSA #1 Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

Indiana RSA 2 Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Iowa 8 – Monona Limited Partnership d/b/a Verizon Wireless
By CommNet Cellular Inc., Its Managing Agent

Iowa RSA 5 Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

Iowa RSA 10 General Partnership
By Cellco Partnership d/b/a Verizon Wireless, Its Manager

Iowa RSA No. 4 Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Los Angeles SMSA Limited Partnership d/b/a Verizon Wireless
By AirTouch Cellular, Its General Partner

Missouri Valley Cellular, Inc. d/b/a Verizon Wireless
By CommNet Cellular, Inc., Its Managing Agent

Modoc RSA Limited Partnership d/b/a Verizon Wireless
By AirTouch Cellular, Its General Partner

Muskegon Cellular Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

NC-2 LLC d/b/a Verizon Wireless

New Hampshire RSA 2 Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

New Mexico RSA 3 Limited Partnership d/b/a Verizon Wireless
By GTE Mobilnet of the Southwest LLC, Its General Partner
By Cellco Partnership, its Sole Member

New Mexico RSA 6-1 Partnership d/b/a Verizon Wireless
By GTE Mobilnet of the Southwest LLC, Its General Partner
By Cellco Partnership, Its Sole Member

New Mexico RSA No. 5 Limited Partnership d/b/a Verizon Wireless
By GTE Mobilnet of the Southwest LLC, Its General Partner
By Cellco Partnership, Its Sole Member

New Par d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

New York RSA 2 Cellular Partnership d/b/a Verizon Wireless
By Upstate Cellular Network, Its General Partner
By Cellco Partnership, Its General Partner

New York RSA No. 3 Cellular Partnership d/b/a Verizon Wireless
By Upstate Cellular Network, Its General Partner
By Cellco Partnership, Its General Partner

New York SMSA Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

North Central RSA 2 of North Dakota Limited Partnership d/b/a Verizon Wireless
By CommNet Cellular Inc., Its Managing Agent

North Dakota 5 - Kidder Limited Partnership d/b/a Verizon Wireless
By CommNet Cellular Inc., Its Managing Agent

North Dakota RSA No. 3 Limited Partnership d/b/a Verizon Wireless
By AirTouch North Dakota, LLC, Its General Partner

Northeast Pennsylvania SMSA Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Northern New Mexico Limited Partnership d/b/a Verizon Wireless
By Cellular Inc. Network Corporation, Its General Partner

Northwest Dakota Cellular of North Dakota Limited Partnership d/b/a Verizon Wireless
By CommNet Cellular Inc., Its Managing Agent

NYNEX Mobile Limited Partnership 1 d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

NYNEX Mobile Limited Partnership 2 d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

NYNEX Mobile of New York, LP d/b/a Verizon Wireless
By Upstate Cellular Network, Its General Partner
By Cellco Partnership, Its General Partner

Olympia Cellular Limited Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

Omaha Cellular Telephone Company d/b/a Verizon Wireless
By AirTouch Nebraska, LLC, Its General Partner
By Cellco Partnership, Its Sole Member

Orange County-Poughkeepsie Limited Partnership d/b/a Verizon Wireless
By Verizon Wireless of the East LP, Its General Partner
By Verizon Wireless of Georgia LLC, Its General Partner
By Cellco Partnership, Its Sole Member

Oxnard-Ventura-Simi Limited Partnership d/b/a Verizon Wireless
By AirTouch Cellular, Its General Partner

Pennsylvania 3 Sector 2 Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Pennsylvania 4 Sector 2 Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Pennsylvania RSA 1 Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Pennsylvania RSA No. 6 (I) Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Pennsylvania RSA No. 6 (II) Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Pittsburgh SMSA Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Pittsfield Cellular Telephone Company d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Platte River Cellular of Colorado Limited Partnership d/b/a Verizon Wireless
By: CommNet Cellular Inc., Its Managing Agent

Portland Cellular Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Pueblo Cellular, Inc. d/b/a Verizon Wireless

Redding MSA Limited Partnership d/b/a Verizon Wireless
By Sacramento Valley Limited Partnership, Its General Partner
By AirTouch Cellular, Its General Partner

Rockford MSA Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

RSA 7 Limited Partnership d/b/a Verizon Wireless
By AirTouch Iowa RSA 7, LLC, Its Managing Partner
By Cellco Partnership, Its Sole Member

Sacramento Valley Limited Partnership d/b/a Verizon Wireless
By AirTouch Cellular, Its General Partner

San Antonio MTA, L.P. d/b/a Verizon Wireless
By Verizon Wireless Texas, LLC, Its General Partner

San Isabel Cellular of Colorado Limited Partnership d/b/a Verizon Wireless
By: CommNet Cellular Inc., Its Managing Agent

Sanborn Cellular, Inc. d/b/a Verizon Wireless
By CommNet Cellular, Inc., Its Managing Agent

Sangre De Cristo Cellular, Inc. d/b/a Verizon Wireless
By CommNet Cellular, Inc., Its Managing Agent

Seattle SMSA Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Sioux City MSA Limited Partnership d/b/a Verizon Wireless
By Cellular Inc. Network Corporation, Its General Partner

Smoky Hill Cellular of Colorado Limited Partnership d/b/a Verizon Wireless
By CommNet Cellular Inc., Its Managing Agent

Southern & Central Wireless, LLC d/b/a Verizon Wireless
By Cellco Partnership, Its Sole Member

Southern Indiana RSA Limited Partnership d/b/a Verizon Wireless
By GTE Wireless of the Midwest Incorporated, Its General Partner

Southwestco Wireless LP d/b/a Verizon Wireless
By Southwestco Wireless Inc., Its Managing Partner

Spokane MSA Limited Partnership d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

Springfield Cellular Telephone Company d/b/a Verizon Wireless
By New Par, Its General Partner
By Verizon Wireless (VAW) LLC, Its General Partner

St. Joseph CellTelCo d/b/a Verizon Wireless
By Verizon Wireless (VAW) LLC, Its General Partner

St. Lawrence Seaway RSA Cellular Partnership d/b/a Verizon Wireless
By Upstate Cellular Network, Its General Partner
By Cellco Partnership, Its General Partner

Syracuse SMSA Limited Partnership d/b/a Verizon Wireless
By Upstate Cellular Network, Its General Partner
By Cellco Partnership, Its General Partner

The Great Salt Flats Partnership d/b/a Verizon Wireless
By AirTouch Utah, LLC, Its General Partner
By Cellco Partnership, Its Sole Member

Topeka Cellular Telephone Company, Inc. d/b/a Verizon Wireless

Tuscaloosa Cellular Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Upstate Cellular Network d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Utah RSA 6 Limited Partnership d/b/a Verizon Wireless
By CommNet Cellular Inc., Its Managing Agent

Verizon Wireless (VAW) LLC d/b/a Verizon Wireless

Verizon Wireless of the East LP d/b/a Verizon Wireless
By Verizon Wireless of Georgia LLC, Its General Partner
By Cellco Partnership, Its Sole Member

Verizon Wireless Personal Communications LP d/b/a Verizon Wireless

Verizon Wireless Tennessee Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Vermont RSA Limited Partnership d/b/a Verizon Wireless
By NYNEX Mobile Limited Partnership 1, Its General Partner
By Cellco Partnership, Its General Partner

Virginia RSA 5 Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Virginia 10 RSA Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Wasatch Utah RSA No. 2 Limited Partnership d/b/a Verizon Wireless
By AirTouch Utah, LLC, Its General Partner
By Cellco Partnership, Its Sole Member

Washington, DC SMSA Limited Partnership d/b/a Verizon Wireless
By Cellco Partnership, Its General Partner

Waterloo MSA Limited Partnership d/b/a Verizon Wireless
By Southwestco Wireless LP, Its General Partner
By Southwestco Wireless Inc., Its General Partner

Wyoming 1 - Park Limited Partnership d/b/a Verizon Wireless
By CommNet Cellular Inc., Its Managing Agent

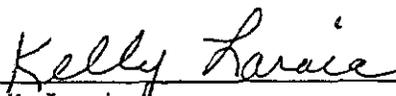
For Wireline Carrier B:

[Wireline Carrier B to insert its affiliates list here]

CERTIFICATE OF SERVICE

I, Kelly Laraia, hereby certify that a copy of the foregoing Petition for Extension of Time to Implement Local Number Portability was served by first class U.S. mail on this 15th day of April, 2004 to the person listed below:

Linda Godfrey
Member of Technical Staff
Interconnection Numbering and Mandates
Verizon Wireless
2785 Mitchell Drive MS 7-1
Walnut Creek, CA 94598



Kelly Laraia