

CHOICE PHONE, LLC

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June 29, 2006

Federal Communications Commission
Marlene H. Dortch
Secretary
445 12th Street, SW
Washington, DC 20554

Re: Telephone Number Portability, WCB Docket No. 95-116

Ms. Dortch:

Choice Phone LLC dba iConnect (“Choice”), a digital Specialized Mobile Radio (“SMR”) operator serving Guam and the Commonwealth of the Northern Mariana Islands (“CNMI”) hereby petitions the Chief of the Wireless Telecommunications Bureau pursuant to Section 52.31 (d) of the Commission's Rules to extend the date for wireless to wireless Local Number Portability (“LNP”) implementation for Choice in the CNMI from July 1, 2006 until such time that the CNMI telecommunications infrastructure has been upgraded to be capable of supporting LNP.

Choice additionally requests that the Chief, Wireless Telecommunications Bureau, waive the 60-day filing requirement for obtaining an extension for the date for implementation of LNP in CNMI. The Local Exchange Carrier (“LEC”) in the CNMI, Pacific Telecom Inc. (“PTI”) informed Choice they would be obtaining a waiver from the Commission. Choice had initially intended to wait for PTI’s waiver request prior to filing this waiver request in order to synchronize the dates and benchmarks for LNP implementation in the CNMI. In support of this request, Choice hereby states as follows.

- 1) Until the required upgrades to support LNP within the CNMI telecommunications system have been implanted and tested, Choice is unable to implement LNP in the CNMI.
- 2) Choice received a Bona Fide Request (“BFR”) from Saipan Cellular and Paging Inc. dba SaipanCell (“SaipanCell”) on December 21, 2005 requesting implementation of LNP in the CNMI by July 1, 2006.

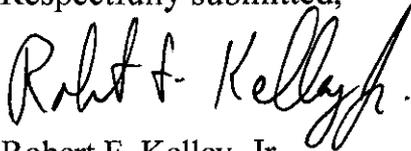
- 3) Choice provides SMR service within the CNMI and Guam utilizing a Motorola iDen Harmony Switch that is LNP capable and is currently supporting LNP in Guam.

All CMRS carriers in the CNMI connect with each other through the tandem facilities of PTI's wireline telephone system. This makes it mandatory that PTI be able to support LNP testing and implementation before Choice can properly implement LNP in the CNMI. Local landline and long distance traffic are also routed through the PTI Tandem Switch. Therefore, the implementation and testing of Wireless-to-Wireless LNP in the CNMI cannot be implemented or even be scheduled until PTI as the LEC and N-1 carrier is capable of supporting the required SS7 services and routing.

An email was sent to Tom Gibson of SaipanCell (and GuamCell) on May 31 by PTI indicating that they are unable to support an LNP implementation and that they would be requesting a waiver with the Commission. Choice has not received a copy of a PTI Request to delay the implementation of LNP in the CNMI. Choice has been informed that it will be at least 6 months for required upgrades to be implemented in the CNMI telecommunications infrastructure. Until such time that Choice is provided with a firm schedule for the required network upgrades, it will not be possible to provide the Commission with date specific milestones.

Due to the circumstances as outlined in this letter, Choice hereby requests an indefinite delay for implementation of wireless LNP in the CNMI. Choice will keep the Commission informed regarding projected implementation dates after the LEC provides the information regarding LNP implementation to the CNMI telecommunications industry.

Respectfully submitted,



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Distribution List

This waiver request was filed with the Federal Communication Commission through the Commission's Electronic Comment Filing System (ECFS) on June 30, 2006. The following parties were provided copies via Email.

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