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July 19, 2006

VIA ELECTRONIC SUBMISSION

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Presentation
CC Docket No. 99-200**

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, Teresa Junkert, Joanne Edelman, Dana Smith and Lolita D. Forbes, representing Verizon Wireless ("VZW"), submit this notice in the above-captioned docketed proceeding of an *ex parte* meeting with Renee Roland Crittendon, Chief, Competition Policy Division; Ann Stevens, Marilyn Jones, Mary McManus, and Heather Hendrickson, Attorney Advisors; and Heather Thompson, Intern, all of the Wireline Competition Bureau ("WCB"). The purpose of the meeting was to: (1) introduce the Verizon Wireless numbering team to the staff and leadership of the Competition Policy Division of the WCB; (2) discuss the pending proceeding regarding expanding pooling to areas outside the top 100 MSAs; and (3) request information regarding the status of several pending numbering dockets.

Under the circumstances provided below, Verizon Wireless supports expanded pooling, which is preferable to the cost and inconvenience (to both industry and consumers) of NPA relief. In addition, VZW does have concerns about timing of implementation and costs to carriers. To demonstrate VZW's support for pooling, but consistent with its concerns, VZW discussed the following proposal:

- The FCC should announce a policy goal that all NPAs should eventually participate in pooling before they exhaust and therefore require that all "excluded" rate centers become "optional" pooling rate centers.

Marlene H. Dortch

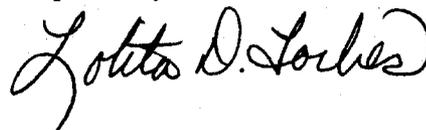
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- The FCC should delegate authority to states to require “mandatory” pooling in any NPA where:
 - The NPA will exhaust within the next 6 years (additional NPAs would be eligible for pooling as they enter this exhaust window);
 - The NPA has at least a 1 year of life left; and
 - Customer notification of relief has not yet begun.
- Once the above criteria are met, states would determine when to pursue pooling in areas outside the top 100 MSAs. When a state chooses to order mandatory pooling in a given NPA, the state must work with industry and the Pooling Administrator to set a feasible implementation timeframe to avoid overburdening the industry.
- The FCC should require states to petition the FCC for further authority to implement pooling in NPAs not meeting the above criteria.

With respect to other pending dockets, the Commission staff reported that the division is prioritizing its new workload of numbering matters.

Respectfully submitted,

A handwritten signature in black ink that reads "Lolita D. Forbes". The signature is written in a cursive style with a large, looping initial "L".

Lolita D. Forbes