

September 10, 2008

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., TW-A325  
Washington, D.C. 20554

**Ex Parte Notice:**

***In the Matter of the Commercial Mobile Alert System, PS Dockets Nos. 07-287, 08-146;***

***In the Matter of Development of Nationwide Broadband Data, WC Docket No. 07-38;***

***In the Matter of  
Local Number Portability, WC Docket No. 07-244;  
Telephone Number Portability, CC Docket No. 95-116;  
Numbering Resource Optimization, CC Docket No. 99-200;***

***In the Matter of NTCA Petition for Expedited Clarification and/or Limited Waiver of the  
Commission's Part 36 Rules, CC Docket No. 80-286;***

Dear Ms. Dortch:

On Tuesday, September 9, 2008, Karlen Reed, Regulatory Counsel with the National Telecommunications Cooperative Association (NTCA), met with Amy Bender, Legal Advisor to Chairman Kevin Martin. We discussed issues raised in NTCA's comments in support for the CMAS program, including the CMAS September 8 election letters and the progress by the Federal Emergency Management Agency (FEMA)'s December 31, 2008 deadline as the CMAS Alert Gateway/Aggregator to issue CMAS Government Interface Design Specifications. We also discussed NTCA's continued request that the Commission keep FCC Form 477 broadband reporting data confidential and refrain from imposing new broadband mapping requirements until the Commission reviews the new census tract data that will be available in March 2009.

NTCA renewed its opposition to shortening the four-business day intermodal number porting interval, and we discussed the merits of a one-year porting interval implementation period for small entities as defined by the Regulatory Flexibility Act. NTCA highlighted portions of its August 29, 2008 Petition for Clarification and/or Waiver of Part 36 separations rules that would allow all rate-of-return carriers to directly assign USAC audit costs to the interstate jurisdiction. Attached are copies of the handouts referenced during this discussion. The discussions were consistent with NTCA's positions in previously filed comments and pleadings in the above-referenced dockets.

September 10, 2008  
Ms. Marlene H. Dortch  
Page Two

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (703) 351-2146.

Sincerely,

/s/ Karlen Reed  
Karlen Reed  
Regulatory Counsel, Legal and Industry

KR: rhb  
Enclosures

cc: Amy Bender