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April 23, 2009

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: *In the Matter of Local Number Portability Porting Interval and Validation Requirements*,
WC Docket No. 07-244; *In the Matter of Local Number Portability*, CC Docket No. 95-116

Dear Ms. Dortch:

On April 22nd, Hank Hultquist, Bill Brown, and the undersigned of AT&T met with Julie Veach, Randy Clarke, Al Lewis, and Ann Stevens of the Wireline Competition Bureau regarding the above referenced proceeding. In that meeting, we expressed AT&T continued support for reducing the interval for intermodal and wireline-to-wireline number portability. We also pointed to the success of the wireless industry regarding the efficiencies that can be achieved, and urged the Commission to promote similar efficiencies on an industry-wide basis by ensuring that improvements in the efficiency of number portability benefit consumers irrespective of the identity of their incoming or outgoing service provider.

To achieve this objective, it is critical that the Commission not simply order a reduction in the porting interval. No such reduction can be achieved on an industry-wide, reciprocal basis without development of a streamlined and standardized process. The development of such a process has enabled the wireless industry to routinely accomplish number ports within two hours.

Accordingly, the Commission should direct the industry to develop a uniform, standardized process designed to ensure that the vast majority of intermodal and wireline-to-wireline ports are completed in two days or less. The Commission should further direct the North American Numbering Council to oversee this development and report on its completion within no more than six months.

In accordance with Section 1.1206 of the Commission's rules, a copy of this letter will be filed in both of the above referenced dockets. Should you have any questions, please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. Tan".

Cc: Ms. Julie Veach
Mr. Randy Clarke
Mr. Al Lewis
Ms. Ann Stevens