



INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE

May 6, 2009

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

**Re: Local Number Portability Porting Interval and
Validation Requirements
WC Docket No. 07-244**

Dear Ms. Dortch:

Today, Curt Stamp, President of ITTA, Mary Retka and Jan Doell of Qwest Communications, and Sara Cole of TDS Telecom met via teleconference with Melissa Kirkel, William Dever, Ann Stevens, Albert Lewis, and Deena Shetler of the Commission to discuss the above-captioned docket.

The parties discussed ITTA's May 5, 2009, filing in this docket. Specifically, ITTA urged the Commission to refrain from implementing a 48-hour/two-calendar day porting interval. ITTA explained that a two-calendar day, rather than two-business day, interval would require non-automated carriers to incur significant expenses, including those related to evening, weekend, and holiday staffing. ITTA also urged the Commission to provide carriers with the opportunity to recover on a line-item basis the costs of meeting a shortened porting interval, consistent with the Commission's prior practices.

Respectfully submitted,

*s/*Joshua Seidemann
Joshua Seidemann
Vice President, Regulatory Affairs

cc: Melissa Kirkel
William Dever
Ann Stevens
Albert Lewis
Deena Shetler

(all via e-mail)