



INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE

May 7, 2009

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

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

Dear Ms. Dortch:

Yesterday, Curt Stamp, President of ITTA, met via telephone with Mark Stone of Commissioner Jonathan Adelstein's office.

Mr. Stamp 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: Mark Stone