

September 9, 2003

Mr. John Comisky
Staff Vice President
Verizon Wireless
30 Independence Blvd. Fourth Floor
Warren, NJ 07059

Re: CC Docket No. 95-116: Wireless Local Number Portability Implementation

Dear Mr. Comisky:

As you are aware, the Commission's rules require wireless carriers to implement local number portability (LNP) by November 24, 2003.¹ The Commission expects carriers to meet this deadline and is committed to working with carriers to ensure that there is a smooth and efficient process in place for consumers.

In 1996, the Commission first announced that wireless carriers would have to implement local number portability. After wireless carriers received several deadline extensions, the Cellular Telecommunications and Internet Association (CTIA) petitioned the Commission to address some implementation and transition issues involving LNP.² While not all carriers believe that the Commission needs to address all of the issues CTIA has raised prior to the November 24, 2003, implementation deadline, the Commission expects to provide guidance to carriers prior to November. In the meantime, it is critical that carriers continue to work toward completing their implementation efforts as quickly as possible. For example, even if carriers have not finalized agreements, it is important that they begin testing with other carriers to ensure porting functionality by the November implementation deadline. To help the Commission assess the progress carriers have made toward meeting the LNP implementation deadline, the Bureau has determined to seek information from selected carriers on their implementation efforts in representative markets. Therefore, pursuant to section 52.31(e) of the Commission's rules,³ I request that you provide for inclusion in the public record in this proceeding written responses to the information requests set forth below by or before September 23, 2003.

With respect to the local Nashville market in which your company provides service,

For All Porting:

1. Identify the switches for which your company has received a request for the provision of LNP by another carrier. Identify the carriers that have submitted requests for the provision of LNP to your company.

¹ On June 6, 2003, the Court of Appeals for the District of Columbia issued an opinion affirming the Commission's July 26, 2002, order denying a request from Verizon Wireless for permanent forbearance of the LNP requirements. *See Cellular Telecommunications & Internet Association and Cellco Partnership d/b/a/ Verizon Wireless v. FCC* (D.C. Cir.) (No. 02-1264) (decided June 6, 2003).

² *See* Petition for Declaratory Ruling of the Cellular Telecommunications & Internet Association, CC Docket No. 95-116 (filed Jan. 23, 2003); Petition for Declaratory Ruling of the Cellular Telecommunications & Internet Association, CC Docket No. 95-116 (filed May 13, 2003).

³ 47 C.F.R. § 52.31(e).

2. Indicate whether your company has completed testing with the Number Portability Administration Center (NPAC) and the date such testing was completed. If testing is not complete, indicate the date by which testing will be completed.
3. Indicate whether your company has completed training of customer service personnel. Indicate the length and scope of the training provided. If training is not complete, indicate the date by which training will be completed.

For Porting with Other Wireless Carriers:

4. Indicate whether your company has completed intercarrier testing. Identify the carriers your company has tested with, and the date such testing was completed. If testing is not complete, indicate the date by which testing will be completed.
5. If your company provides roaming services, indicate whether your company has updated business arrangements with non-porting roaming partners to ensure that they will support roaming for customers with ported numbers.

For Porting with Wireline Carriers:

6. Indicate whether your company has coordinated with wireline carriers to facilitate porting. Identify the carriers your company has coordinated with and the date any coordination was completed.
7. Indicate whether your company has completed intercarrier testing with wireline carriers. Identify the carriers your company has tested with and the date such testing was completed. If testing is not complete, indicate the date by which testing will be completed.

You may choose to file your responses in tabular form, if you prefer. If you choose to submit your responses in tabular form, please use an Excel spreadsheet. Responses should be filed using the Commission's Electronic Comment Filing System (ECFS), pursuant to the filing procedures for *ex parte* submissions.⁴ Responses sent through ECFS can be sent as an electronic file via the Internet to <http://www.fcc.gov/e-file/ecfs.html>. In completing the transmittal screen, filers should indicate their full name, Postal Service mailing address, and the docket number for this proceeding, CC Docket No. 95-116.

If you choose to file by paper, please file two copies of your responses with Marlene H. Dortch, Secretary, Federal Communications Commission, 445 12th St., S.W., Washington D.C. 20554. Your response should indicate the docket number for this proceeding, CC Docket No. 95-116. In addition, please send one copy of your response to Jennifer Salhus, Policy Division, Wireless Telecommunications Bureau, Federal Communications Commission, 445 12th St., S.W., Washington D.C. 20554.

In addition, David Solomon, Chief of the Enforcement Bureau and I would like to arrange a date this month or early in October to visit your company and review your implementation procedures. Members of my staff will contact you to arrange this visit.

⁴ See 47 C.F.R. §§ 1.1200-1.1216.

Thank you in advance for your cooperation in this matter. I look forward to receiving your prompt and complete response to the inquiries listed above. Should you have any questions, please contact the Bureau's Policy Division at (202) 418-1310.

Sincerely,

John B. Muleta
Chief, Wireless Telecommunications Bureau

cc: John T. Scott, III