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Filed Electronically

September 23, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation in CC Docket No. 95-116

Dear Ms. Dortch:

The attached letter was sent to John Muleta, Chief of the Wireless Telecommunications Bureau in response to a request for information dated September 9, 2003.

Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Anne E. Hoskins".

Anne E. Hoskins

cc: J. Muleta
D. Solomon
J. Salhus

John T. Scott, III
Vice President &
Deputy General Counsel
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Mr. John B. Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Mr. Muleta:

This letter responds to your September 9, 2003 request for information about Verizon Wireless's local number portability ("LNP") implementation, including an overview of its testing, training and inter-carrier coordination efforts to date to provision LNP in the local Nashville, Tennessee market.

Verizon Wireless operates on a national basis and is implementing LNP under a centralized operational plan. As such, detailed information specific only to the Nashville market is not available for each of the questions posed in your letter. Where appropriate, we refer to Verizon Wireless' centralized implementation plan and efforts. The Verizon Wireless Port Center, which will facilitate resolution of any porting complications, is located in the Nashville MSA in the suburb of Murfreesboro, TN. Consequently, some porting activities, such as the training of call center representatives, are centered in the Nashville market, but those representatives will provide service nationwide.

As you will see below, Verizon Wireless has made tremendous progress in training its employees (customer service, sales and operational) to make LNP a positive experience for customers who seek to port their numbers either to or away from Verizon Wireless. Verizon Wireless is facing greater difficulty, however, on the inter-carrier front with testing and coordination, particularly with wireline carriers.

- 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.**

For the Nashville, Tennessee market, Verizon Wireless received Bona Fide Requests (“BFRs”) to open up four switches. The following switch CLLIs (common language location identifiers) were requested by another carrier to be ready for portability:

NSVNTNCFCM0
NSVLTN32CM1
MRBOTNBBH01
MTRYTNAA1MD

All of these Verizon Wireless switches are LNP capable and have been marked portable in the LERG™, (Location Exchange Routing Guide) as of 9/03.

The following carriers submitted requests for Verizon Wireless to provision LNP in the Nashville MSA: Alltel, AT&T Wireless, Cingular, Dobson, First Cellular South Illinois, Nextel, Sprint PCS. Of these carriers, only AT&T Wireless, Cingular, Nextel and Sprint PCS are licensed to provide wireless service in the Nashville market. Verizon Wireless did not receive BFRs from any wireline carriers in the Nashville market.

- 2. Indicate whether your company has completed testing with the NPAC and the date such testing was completed. If testing is not complete, indicate the date by which testing will be completed.**

Verizon Wireless is using a third party service provider, TSI, to facilitate porting operations and communications with the NPAC. TSI has completed certification testing for NPAC releases 2.1, 3.0 and 3.2. TSI successfully completed testing of the NPAC’s latest version (3.2) in June 2003.

- 3. Indicate whether your company has completed training of customer service personnel. Indicate the length and scope of training provided. If training is not complete, indicate the date by which training will be completed.**

Verizon Wireless is training its workforce on a national basis, with the exception of Port Center customer care representatives, who are all located in the Nashville market. Verizon Wireless has completed its first round of training and is now engaged in a second round of more intensive training of its customer-facing and front-line employees. Specifically:

- Verizon Wireless began “overview” LNP training for all employees in the business in June 2003 and completed this training in August 2003.
- Verizon Wireless conducted master training for its trainers in early September 2003.
- Front line employees (i.e. Sales and Customer Service) began comprehensive LNP training during the week of 9/22/03. This training is scheduled to be completed during the week of 11/3/03. This classroom training is 4 ½ hours long and includes detailed information about number portability, methods and

procedures for porting process, and changes to business processes to support LNP. These employees will take an on-line refresher course in November.

- Verizon Wireless is also assisting its wholesale (resellers) and retail (indirect sales force) partners with training development for their customer service personnel. Training for those partners will begin in October.
- Port Center staff, located in the Nashville market, began training on 9/8/03 and this training will continue through November.

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 completed indicate the date by which testing will be completed.

Verizon Wireless has been actively testing its LNP systems. These tests are designed to support successful company-wide deployment of LNP in November 2003, and are therefore not focused on testing of specific markets. The testing strategy is to test every type of switch and billing system combination on an end-to-end basis to ensure that the port request will flow through accurately, regardless of the underlying network and billing technology. Verizon Wireless is also seeking to complete tests with the largest wireless carriers and with a representative sample of rural and smaller wireless carriers.

According to Verizon Wireless' records, the following wireless carriers are licensed to provide service in the Nashville market: Sprint PCS, Cingular, T-Mobile, Cricket, AT&T Wireless, Nextel and Verizon Wireless. While testing has not been conducted with any of these carriers specifically in the Nashville market, testing has been conducted and is continuing with all of these carriers in different places across the country. Specifically, the scheduled and completed test dates with these carriers include:

AT&T Wireless: 4/17-25/03; 7/28/03- 8/1/03; 10/6-10/03

Cingular: 8/11-15/03; 9/11-12/03; 9/24-26/03; 10/20-24/03

Nextel: 5/19-30/03; 8/25-29/03; 10/13-17/03; 10/27-31/03

Sprint PCS: 8/4-8/03; 9/8-13/03; 10/13-17/03

T-Mobile: 9/9-13/03; 10/6-10/03; 11/17-21/03

Leap (Cricket) Wireless: 9/15-20/03; 11/3-7/03

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.

Verizon Wireless' roaming partners in the Nashville market (which is within the top 100 MSAs) are all LNP capable. As for areas outside the top-100 MSAs and outside the Nashville market, Verizon Wireless requested all of its roaming partners in 2002 to complete necessary upgrades to support MIN/ MDN separation, so that roaming by customers with pooled or ported numbers would not be degraded. Verizon Wireless notes that all carriers, whether LNP capable or not, were required to support roaming by customers with different MINs and MDNs in their handsets (due to MIN/MDN separation) by last November, 2002, when CMRS carriers were required by the FCC to implement pooling.

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.

Verizon Wireless is seeking uniform national agreements on provisioning wireless/wireline LNP and is not approaching wireline carriers on a market- specific basis. In May 2003, Verizon Wireless sent BFRs to wireline carriers (that had not identified their switches as being open for porting in the LERG) and that serve areas that coincide with Verizon Wireless service territories (including the Nashville MSA). Many wireline carriers serving areas across the country have rejected Verizon Wireless's valid BFRs and/or are insisting on restrictions on porting that could create barriers to customers' abilities to port.

Verizon Wireless sent BFRs to the following companies which it believes serves the Nashville area: BellSouth Telecom; ICG Telecom Group, Inc.; Sprint United Tel of Ohio; XO Communications; Ben Lomand Rural Telephone Corp.; North Central Tel. Corp. and United Tel. Inc. In the Nashville area, Ben Lomand Rural Telephone Corp. and North Central Tel. Corp. both sent written notification to Verizon Wireless questioning whether the BFR they received from Verizon Wireless "constitute[s] a valid request for number portability."

Verizon Wireless recently completed a service level agreement ("SLA") with Verizon Communications to provision LNP across territories where both companies provide service. Verizon Wireless is offering to enter into a wireline agreement modeled off the Verizon Communications/ Verizon Wireless SLA with all other wireline carriers, including carriers serving the Nashville market.

On a separate track from the SLA negotiation process, Verizon Wireless has been working to ascertain the LEC-specific procedures for completing port requests (*ie.*, some LECs will only accept faxed forms; other LECs refuse faxed requests and require the use of their electronic interfaces). In order to understand how to facilitate porting with specific LECs Verizon Wireless has been contacting the carriers, exploring their porting websites, if available, and attending training conferences as offered.

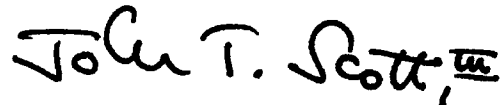
7. Indicate whether your company has completed intercarrier testing with wireline carriers. Identify the carriers your company has tested with and the date such testing was complete. If testing is not complete indicate the date by which testing will be completed.

As noted above, Verizon Wireless is working to test operational systems, switches and billing systems systematically and is not approaching testing on a market-by-market basis. To date, Verizon Wireless has been able to secure testing dates with only two LECs (to be conducted in late September), and we are presently negotiating testing dates with two more LECs. Of specific concern to the Nashville market, BellSouth has not agreed to any testing dates with Verizon Wireless. We encourage the Commission to contact landline carriers and request that they report on their progress.

As you know, for LNP to work smoothly for customers in November, carriers will need to work together on testing and in reaching agreements on porting processes. Progress on the wireless/wireless front is greater than the wireline/ wireless front in large part because of the outstanding inter-modal policy issues before the FCC. Specifically, until the FCC resolves the disputes relating to rate centers and the form of agreement (interconnection vs. service level agreement), Verizon Wireless will have a difficult task in completing porting agreements and testing with wireline carriers. The Verizon Wireless/ Verizon Communications service level agreement resolves these issues and could serve as a model for the industry if the FCC confirms the following: (1) multi-state stand-alone agreements are sufficient to facilitate inter-modal LNP, rather than negotiation of cumbersome, state-specific interconnection agreements or amendments; and (2) artificial "rate-center" based restrictions are unauthorized barriers to porting and are unnecessary given the LRN-based porting technology and the fact that ported numbers will remain associated with the local rate center.

On the wireless/ wireless front, one final action is needed from the FCC: confirmation of the barrier-free porting interpretation you issued on July 3, 2003. As you know, several wireless carriers have refused to comply with your letter and want to impose restrictions or delays on porting. Their position has blocked Verizon Wireless' ability to reach agreements that will facilitate quick and simple porting for customers. Verizon Wireless urges the Commission to act now to affirm the July 3 letter and the importance of barrier-free porting for consumers.

Sincerely,

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive style with a small "III" at the end.

John T. Scott, III

cc: David Solomon
Jennifer Salhus
John Comisky