



**CTIA**

*Building The Wireless Future™*

Cellular Telecommunications & Internet Association

December 10, 2002

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
12<sup>th</sup> Street Lobby, TW-A325  
Washington, DC 20554

**Re: *Ex Parte* Presentation  
WT Docket No. 01-184; CC Docket No. 94-102; ET Docket No. 02-  
135; CC Docket No. 99-200; CC Docket No. 01-92**

Dear Ms. Dortch:

On December 3, 2002, the Cellular Telecommunications & Internet Association (“CTIA”), represented by Tom Wheeler, CEO and President, Tim Donahue, Chairman of CTIA and President and CEO, Nextel Communications, Scott Ford, Vice Chairman of CTIA and CEO, Alltel, Mohan Gyani, CEO and President, AT&T Wireless Services, Len Lauer, President, Sprint PCS, John Stanton, CEO, T-Mobile USA, Dennis Strigl, CEO and President, Verizon Wireless, met with Chairman Powell, Marsha MacBride, Chief of Staff, Bryan Tramont, Senior Legal Advisor, and Tom Sugrue, Chief of the Wireless Telecommunications Bureau. The wireless carrier representatives spoke generally of the effect of the current economic climate on the CMRS industry. They emphasized the importance of minimizing costs flowing from regulatory mandates in order to devote their resources to infrastructure buildout and customer service.

In particular, the carrier representatives discussed the significant economic impact that implementation of local number portability (“LNP”) would have on their operations, and the extent to which LNP would divert resources from other important customer service efforts.

On E 911 issues, the CMRS representatives highlighted several conclusions of the Hatfield Report. They agreed with the report’s conclusion that the Public Safety and Local Exchange Carrier (“LEC”) communities are far behind the CMRS industry in implementing E 911, and expressed frustration with the lack of coordination among these groups. They urged the FCC to take a more active role in encouraging coordination among the Public Safety, LEC and CMRS communities.

In the interconnection context, the carriers urged the Commission to move ahead with a “bill and keep” approach for LEC-CMRS interconnection. They suggested that action on LEC-CMRS interconnection should not await action on the broader proceeding involving the full telecom industry, but should instead proceed immediately.



The carriers also expressed significant concern about proposed State regulatory initiatives. For example, the carriers cited the California Public Utilities Commission's petition at the FCC to "take back" CMRS numbers in the 310 and 909 area codes as an example of potential State action that would discriminate against wireless consumers. They also cited other California PUC proposals relating to customer service that could begin a patchwork quilt of inconsistent State regulatory requirements. The carriers emphasized that their service offerings are generally national in scope, and that a series of inconsistent State regulations would dramatically affect their costs, which would have to be passed on to consumers in the form of higher prices.

Finally, the parties discussed the Commission's spectrum reform initiatives. The carriers expressed appreciation for Chairman Powell's efforts to tackle these difficult issues. They encouraged the Chairman to pursue these reforms in a manner that appreciated the significant investments that the CMRS industry has already devoted to infrastructure buildout, and ensured that their customers would continue to enjoy high-quality wireless service.

Sincerely,

*Diane J. Cornell*

Diane J. Cornell

Cc: Chairman Powell  
Marsha MacBride  
Bryan Tramont  
Tom Sugrue