

September 23, 2003

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
236 Massachusetts Avenue NE
Room TW-A325
Washington, DC 20002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Dear Ms. Dortch:

This is in response to the letter dated September 9, 2003, from John Muleta, Chief - Wireless Telecommunications Bureau. The letter is addressed to Ms. Kellye E. Abernathy, concerning wireless local number portability ("WLNP") implementation efforts by Cingular Wireless LLC ("Cingular") in the local Atlanta, GA, market. Cingular's responses to the questions stated in the letter are set forth below. Arrangements also are being made to accommodate the request for a meeting with Cingular, John Muleta and David Solomon, Chief - Enforcement Bureau, concerning WLNP implementation.

There are two preliminary matters. First, Cingular plans to comply fully with the FCC's WLNP rules within the timeframes established in such rules. Second, although the letter inquires about the Atlanta market, Cingular's approach to implementation of WLNP has not been to address issues on a market-by-market basis. Because WLNP implementation touches all of Cingular's systems and processes (e.g., IT support, billing systems, customer support systems, network configuration, interconnection facilities), Cingular has chosen to deal with LNP implementation on a billing system and network-wide basis. (Cingular has two billing systems.) Thus, the answers to the questions in many instances reach beyond what is being done for the Atlanta market.

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.

Answer: Cingular has received bona fide requests ("BFRs") for portability for all switches in the Atlanta MSA. Cingular has received BFRs for Atlanta from ALLTEL, AT&T Wireless, Centennial Cellular, Cricket Communications (Leap Wireless), Dobson Communications, First Cellular of Southern Illinois, Nextel Communications, Nextel Partners, Sprint PCS, Southern Linc, T-Mobile, and Verizon Wireless.

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List A B C D E

Additionally, Cingular has received at least one BFR for every MSA in the Largest 100 MSAs although Cingular does not provide service in all of those MSAs

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

Answer Our SOA has been NPAC Certified and this was completed in the 2nd quarter of 20012 We have been participating in pooling and completing intra-service port transactions through the NPAC in each region since November 2002

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

Answer Cingular has initiated but not completed training of personnel

Instructor-Led and On-Line Training for over 50,000 employees and non-employee personnel in Customer Service Centers and all Sales Channels affected by WLNP is scheduled for completion by November 24, 2003. The length of the training will vary based on user groups, it ranges from 6 hours to 20 hours. The scope of training consists of an overview of WLNP, training on WLNP business processes and systems training

Training will be provided to the following user groups:

Sales Channels

Retail (*e.g.*, Company Owned Retail Stores, Kiosks, Business Sales and Telesales, National Retail Sales)

Indirect Agents

Affiliates

Resellers and Partners

Customer Service

Port Support Group

Port Activation Center

Tier 1 Customer Service Representatives

Tier 2 Technical Support Representatives

Credit and Activations Representatives

Key Accounts Representatives

Business to Business Service Representatives

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.

Answer: Cingular has begun, but not completed, intercarrier testing. Cingular plans to complete scheduled testing by November 21, 2003. However, we anticipate negotiating with wireless carriers to do additional testing, especially outside the Largest 100 MSAs.

Cingular has actively participated in and led the industry's Wireless Testing Subcommittee (WTSC) to implement a framework to enable service providers to work directly with each other to complete intercarrier testing. The WTSC is chartered by the industry's Wireless Number Portability Operations team, which is under the oversight of the North American Numbering Council. From the formation of the WTSC in early 2001 until early 2003, two different Cingular representatives have acted as co-chair of WTSC. Four major testing initiatives were identified -- Network, SOA/ICP, End-to-End, and Round Robin testing. Cingular will be testing all four initiatives in its test plan.

Attachment A includes a test schedule identifying the location, environment, type of test, carrier, duration, and start date.

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.

Answer: Cingular has updated business arrangements with all roaming partners to support roaming for our customers who visit the roaming partners' networks and have pooled or 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 the coordination was completed.

Answer: Cingular has initiated contacts and negotiations for porting with major wireline carriers, including Qwest, SBC, BellSouth, Verizon, Sprint and ALLTEL. To date, these negotiations are not complete.

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.

Answer: Cingular has not completed testing with wireline carriers.

Cingular uses a clearinghouse for intercarrier communications processes. Qwest, BellSouth, Verizon and SBC currently interface with the clearinghouse for the receipt of Local Service Requests. The clearinghouse is coordinating the testing for these companies and Cingular. Additionally, we have scheduled end-to-end testing with SBC in Hartford, Connecticut, beginning October 13, 2003, and with Sprint in Orlando beginning October 27, 2003. We expect this scheduled testing to be completed in late November. We also anticipate conducting further testing with wireline carriers.

If there are any questions concerning the foregoing, please contact the undersigned at the above address. (202) 419-3020 or ben_almond@cingular.com

Sincerely,



Ben G. Almond
Vice President – Federal Regulatory Affairs

Attachment

cc: John Muleta
David Solomon
Jared Carlson
Jennifer Salhus

ATTACHMENT A

MARKET	ENVIRONMENT	TEST TYPE	# DAYS	START	END	CARRIERS	% Complete
Washington, DC	Testbed	ICP	5 days	7/28/2003	8/1/2003	Nextel	100%
Indianapolis	Testbed	ICP	5 days	8/11/2003	8/15/2003	VZW	100%
Washington, DC (Re-Test)	Testbed	ICP	3 days	8/20/2003	8/22/2003	Nextel	100%
Chicago	Testbed	ICP	5 days	8/25/2003	8/29/2003	USC	100%
Dallas	Testbed	ICP	10 days	9/8/2003	9/19/2003	AWS	90%
Indianapolis	Production	ICP	2 days	9/11/2003	9/12/2003	Verizon Wireless	100%
Atlanta	Testbed	ICP	5 days	9/15/2003	9/19/2003	T-Mobile	100%
Tulsa	Testbed	ICP	5 days	9/22/2003	9/26/2003	Leap Wireless	0%
Raleigh	Production	E2E	5 days	9/22/2003	9/26/2003	AWS	0%
Indianapolis	Production	ICP	3 days	9/24/2003	9/26/2003	Verizon Wireless	0%
Chicago	Production	ICP/NTW	5 days	9/29/2003	10/3/2003	AWS/USC/Nex/Tmob	0%
Chicago	Production	E2E	10 days	9/29/2003	10/10/2003	AWS	0%
Louisville	Testbed	ICP	5 days	10/6/2003	10/10/2003	Nextel Partners	0%
Little Rock	Testbed	ICP	5 days	10/20/2003	10/24/2003	ALLTEL	0%
Hartford	Production	E2E	5 days	10/13/2003	10/17/2003	SBC	0%
Charleston	Testbed	ICP	5 days	10/20/2003	10/24/2003	Triton PCS	0%
Sacramento	Production	E2E	5 days	10/20/2003	10/24/2003	SureWest	0%
Los Angeles	Production	E2E	5 days	10/20/2003	10/24/2003	VZW	0%
Orlando	Production	ICP/NTW	10 days	10/27/2003	11/7/2003	All - Round Robin	0%
Orlando	Production	E2E	5 days	10/27/2003	10/31/2003	SprintPCS	0%
Orlando	Production	E2E	10 days	10/27/2003	11/7/2003	Sprint LTD	0%
Dallas	Production	E2E	5 days	11/3/2003	11/7/2003	Nextel	0%
Atlanta	Production	E2E	5 days	11/10/2003	11/14/2003	T-Mobile	0%
Tulsa	Production	E2E	5 days	11/17/2003	11/21/2003		0%
New York City	Production	E2E	5 days	11/17/2003	11/21/2003	T-Mobile	0%
Little Rock	Production	E2E	5 days	11/17/2003	11/21/2003	ALLTEL	0%