

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER SMITH
COMMISSIONER HANSEN
COMMISSION SECRETARY
COMMISSION STAFF
LEGAL
WORKING FILE**

FROM: DOUG COOLEY

DATE: MARCH 24, 2004

**RE: PETITION OF INLAND TELEPHONE COMPANY FOR SUSPENSION OF
NUMBER PORTABILITY REQUIREMENTS. CASE NO. INL-T-04-1.**

On February 11, 2004, a Petition was filed by Inland Telephone Company requesting suspension until December 31, 2005, of the requirement that it provide number portability from wireline to wireless carriers. In an Order issued November 10, 2003, the FCC requires that incumbent LECs in areas outside the largest 100 metropolitan areas implement number portability no later than May 24, 2004. Section 251(f)(2) allows local exchange carriers with fewer than 2% of the nation's subscriber lines to petition a state commission for suspension or modification of the portability requirements. The Petition states that Inland will need to upgrade its switch at a cost of approximately \$400,000 in order to provide local number portability. Inland states suspending its number portability obligation will not adversely affect customers because it has not received a single number porting request and does not anticipate a significant demand in the foreseeable future.

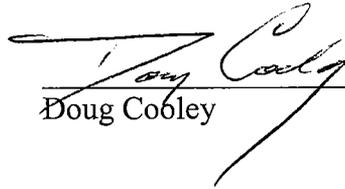
STAFF ANALYSIS

On February 24, 2004, the Commission issued a Notice of Modified Procedure to process Inland's petition. Written comments were filed by the Commission Staff. In its comments, Staff generally supports Inland's request for a suspension and believes the Company is making a reasonable effort to comply with portability obligations by establishing a switch replacement schedule for its offices in Washington and Idaho. Staff pointed out that Inland has been granted

an extension by the Washington Utilities and Transportation Commission and further recommends that the Company be granted an extension in Idaho until December 31, 2005.

COMMISSION DECISION

Does the Commission approve Inland's Petition to suspend its wireline-to-wireless local number portability requirements until December 31, 2005?



Doug Cobley

DC:udmemos/inland lnp memo