

PECTURE 2006 PECS

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March 14, 2006

HAND DELIVERY

Honorable Ron Jones, Chairman c/o Sharla Dillon, Docket & Records Manager Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE: In Re: Petition for Expedited Review of Cellco Partnership d/b/a Verizon Wireless, TRA Docket No. 06-00063

Dear Chairman Jones:

Enclosed for filing are one (1) original and thirteen (13) copies of Verizon Wireless' responses to the Tennessee Regulatory Authority's March 7, 2006, Data Request in the above-captioned matter. An additional copy of this filing is attached to be file-stamped for our records. Please note that **Confidential Exhibit C** is submitted UNDER SEAL AS CONFIDENTIAL AND PROPRIETARY.

Consistent with the request for expedited review, we respectfully request that this matter be considered on March 20, 2006. If you have any questions or require additional information, please let me know as soon as possible.

Respectfully submitted,

Enclosure

MJM·cw



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RE: In Re: Petition for Expedited Review of Cellco Partnership d/b/a Verizon Wireless, TRA Docket No. 06-00063

Dear Chairman Jones:

Pursuant to the Tennessee Regulatory Authority's March 7, 2006, Data Requests in the above-captioned matter, Verizon Wireless, through its undersigned counsel, submits the responses set forth below. Please note that **Confidential Exhibit C** is submitted UNDER SEAL AS CONFIDENTIAL AND PROPRIETARY.

Crossville Rate Center

1. What is the MTE for the Crossville Rate Center?

Response:

See Confidential Exhibit C, attached hereto.

2. The information provided gives 3,348 numbers available in the Crossville Rate Center. Why will these numbers not be able to be used to replace Cookeville numbers assigned to Crossville customers?

Response:

As set forth in the *Petition for Expedited Review of Cellco Partnership d/b/a Verizon Wireless*, TRA Docket No. 06-00063, pp. 1, n. 1 and 5-6 (Mar. 6, 2006) (the "*Petition*"), Verizon Wireless will use its existing inventory of approximately 3,348 numbers in the Crossville Rate Center to alleviate the anticipated demand due to the billing change explained in the *Petition*. Subsequent to the billing change (the elimination of reverse toll billing), Verizon

Wireless reasonably expects, based, in part, upon past experience, that approximately 9,000 affected customers with current numbers from the Cookeville Rate Center will seek new numbers in the Crossville Rate Center. Notwithstanding new customer demand, the billing change alone is expected to result in a shortage of 5,652 available numbers (9,000 less 3,348) in the Crossville Rate Center. In sum, the demand from the billing change, coupled with the increasing demand from new customers, cannot be satisfied by the existing inventory of 3,348 numbers in the Crossville Rate Center alone.

An additional 9,000 numbers for customers in the Crossville area would provide Verizon Wireless with a total of about 12,348 numbers for the following purposes: (1) to preserve the local "landline to mobile" calling scopes for the 9,000 affected customers; and (2) to serve the ever-present demands of new customers. Hence, the additional 9,000 numbers are unlikely to present an unnecessary surplus, but are, in fact, essential. *See Petition*, p. 6, n. 5. Otherwise, a reoccurrence of the 2003 Tennessee experience, as briefly described in the *Petition*, is virtually assured. *See Petition*, p. 5.

McMinnville Rate Center

1. What is the MTE for the McMinnville Rate Center?

Response:

See Confidential Exhibit C, attached hereto.

2. The information provided gives 9,947 numbers available in the McMinnville Rate Center. Why will these numbers not be able to be used to replace Cookeville numbers assigned to McMinnville customers?

Response:

As set forth in the *Petition*, pp. 1, n. 1 and 6, Verizon Wireless <u>will use</u> its existing inventory of approximately 9,947 numbers in the McMinnville Rate Center to alleviate the anticipated demand due to the billing change explained in the *Petition*. Subsequent to the billing change (the elimination of reverse toll billing), Verizon Wireless reasonably expects, based, in part, upon past experience, that approximately 11,700 affected customers with current numbers from the Cookeville Rate Center will seek new numbers in the McMinnville Rate Center. Notwithstanding new customer demand, the billing change alone is expected to result in a shortage of 1,753 available numbers (11,700 less 9,947) in the McMinnville Rate Center. In sum, the demand from the billing change, coupled with the demand from new customers, cannot be satisfied by the existing inventory of 9,947 numbers in the McMinnville Rate Center alone.

An additional 4,000 numbers for customers in the McMinnville area would provide Verizon Wireless with a total of about 13,947 numbers for the following purposes: (1) to preserve the local "landline to mobile" calling scopes for the 11,700 affected customers; and (2) to serve the ever-present demands of new customers. Hence, the additional 4,000 numbers are unlikely to present an unnecessary surplus, but are, in fact, essential. *See Petition*, p. 6, n. 5. Otherwise, a reoccurrence of the 2003 Tennessee experience, as briefly described in the *Petition*, is virtually assured. *See Petition*, p. 5.

If the Authority requires additional information, please let us know.

Respectfully submitted,

Melvin I. Malone

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