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March 16, 2006

ELECTRONICALLY & 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:

Verizon Wireless, through its undersigned counsel, hereby submits an original and thirteen (13) copies of supplemental responses to its initial responses to the Authority's March 7, 2006, Data Requests. Consistent with our March 6th request for expedited review, and the guidelines established by the Federal Communications Commission, we respectfully request that this matter be considered on March 20, 2006.

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.

Supplemental Response:

Subsequent to the submission of both the *Petition* and the March 14th responses to data requests, Verizon Wireless has performed additional analysis with respect to the Crossville request. Based upon the same, Verizon Wireless is persuaded that an additional 7,000 numbers, for customers in the Crossville area, as opposed to the original request of 9,000, will suffice and provide sufficient resources to avoid a repeat of the 2003 Tennessee experience.¹

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?

¹ The existing inventory available in the Crossville area has decreased since the filing of the *Petition*.

Response:

As set forth in the *Petition*, pp. 1, n. 1 and 6, Verizon Wireless will use 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.

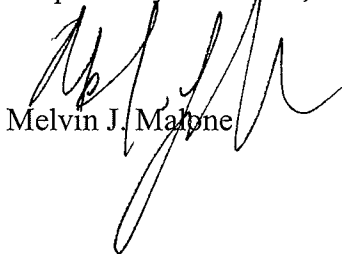
An additional 4,000 numbers for customers in the McMinnville area would provide Verizon Wireless with a total of about 13,947 numbers for the following purposes: (1) to preserve the local "landline to mobile" calling scopes for the 11,700 affected customers; and (2) to serve the ever-present demands 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.

Supplemental Response:

Subsequent to the submission of both the *Petition* and the March 14th responses to data requests, Verizon Wireless has performed additional analysis with respect to the McMinnville request. Based upon the same, Verizon Wireless is persuaded that the original request remains well-grounded in order to avoid a repeat of the 2003 Tennessee experience. In sum, while Verizon Wireless will use a significant portion of the existing inventory of approximately 9,947² numbers in the McMinnville Rate Center to alleviate the anticipated demand due to the billing change explained in the *Petition*, the current average monthly growth rate for the McMinnville area is such that Verizon Wireless is precluded from using the entirety of said existing inventory towards customers impacted by the billing change. To do otherwise would not be in the public interest and would jeopardize the company's ability to fairly serve its Tennessee customers.

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

Respectfully submitted,



Melvin J. Malone

MJM:cw

² The existing inventory available in the McMinnville area has decreased since the filing of the *Petition*.