

July 3, 2018

**Filed Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: *Nationwide Number Portability, WC Docket No. 17-244; Numbering Policies for  
Modern Communications, WC Docket No. 13-97***

Dear Ms. Dortch:

On Monday, July 2, 2018, Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (WTA) met with Brooke Ericson, Chief of Staff to Commissioner Michael O’Rielly, to discuss questions and concerns regarding nationwide number portability (“NNP”), and particularly the draft *Report and Order* to be considered at the Commission’s July 12, 2018 open meeting (FCC-CIRC1807-05).

As stated in its December 27, 2017 comments, WTA’s primary concern is that the Commission address NNP in discrete steps. Specifically, WTA urges the Commission to wait to deal with NNP for wireline telephone numbers until it has implemented and gained experience with NNP for the much more personalized wireless telephone numbers and until the ongoing transition to much more NNP-friendly Voice over Internet Protocol (“VoIP”) technology has proceeded further. Presently, wireline telephone numbers are employed not only by wireline telephone companies to route calls, but also by public safety agencies to respond rapidly to emergencies at the correct physical locations and by a still significant number of ordinary customers to distinguish local calls from long distance calls. WTA members and other rural telephone companies (“RLECs”) will be required to make substantial and expensive changes to switching, call completion and billing equipment and arrangements (including customer education and awareness efforts) in order to implement NNP at a time when their resources are already stretched thin to deploy broadband. An additional complication is that NNP requirements can induce some RLECs to convert their customers more rapidly to customer broadband-only line (“CBOL”) and VoIP services in order to avoid the costs of NNP-required modifications to time division multiplexed (“TDM”) switches and facilities already scheduled for replacement. Whereas this can have benefits, an unanticipated faster transition to CBOL services can also complicate high-cost support budgetary issues.

For purposes of the draft *Report and Order*, WTA supports for reasons of equity, as stated in its December comments, the extension to competitive local exchange carriers (“CLECs”) of forbearance from all remaining equal access and dialing parity requirements, but opposes elimination or modification of the current N-1 query requirement. WTA members believe that the existing N-1 query requirement has been working efficiently and effectively to ensure that carriers know when the number portability database has been (and should be) queried, and that the costs of performing queries are equitably distributed between interexchange and originating service providers. The contemplated revision of the current N-1 query requirement to allow alternative

voluntary arrangements is vastly preferable to outright elimination of it, but is still likely to disrupt the current established system by increasing the possibility of confusion, disputes, and dropped calls. It also may decrease the range of options available to the Commission if and when it decides to move further down the path toward NNP.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,

/s/ Gerard J. Duffy

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