

November 11, 2019

Christine Sanquist  
Tel +1 202 639 5341  
CSanquist@jenner.com

Marlene H. Dortch  
Secretary  
Federal Communication Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **Notice of Ex Parte Presentation**

**WC Docket No. 19-308**, *Modernizing Unbundling and Resale Rules in an Era of Next-Generation Networks and Services*

Dear Ms. Dortch:

On November 7, 2019, the undersigned on behalf of Charter Communications, Inc. (“Charter”) had a call with Ramesh Nagarajan of the Wireline Competition Bureau to discuss the above referenced proceeding. Charter explained the importance of operations support systems (“OSS”) for functions other than the provision of unbundled network elements (“UNEs”). For example, Charter noted that competitive local exchange carriers (“CLECs”) use OSS to order number porting and manage listings in incumbent local exchange carrier (“ILEC”) directories.<sup>1</sup> Charter requested that the Commission add language to the draft Notice of Proposed Rulemaking in this proceeding<sup>2</sup> to clarify the multiple uses of OSS and to seek comment on whether CLECs will be able to port new customers’ telephone numbers without access to OSS as a UNE.

Please contact the undersigned if you have any questions about this matter.

Sincerely,

/s/ Christine N. Sanquist

Christine N. Sanquist

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<sup>1</sup> See 47 C.F.R. 51.319(f) (listing the various functions of operations support systems, including pre-ordering, ordering, provisioning, maintenance and repair, and billing).

<sup>2</sup> *In re Modernizing Unbundling and Resale Rules in an Era of Next-Generation Networks and Services*, draft Notice of Proposed Rulemaking, FCC-CIRC1911-04 (2019).

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cc: Ramesh Nagarajan  
Gregory Capobianco