DOCKET FILE COPY ORIGINAL

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

RECEIVED

AUG 14 2000

FCC MAIL ROOM

August 10, 2000

96-981

Magalie Roman Salas
Commission Secretary
Federal Communications Commission
Portals II
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

Re: Petition of the Connecticut Department of Public Utility Control for Authority to Conduct a Voluntary Unassigned Number Porting Trial

Dear Ms. Salas:

Enclosed please find one original and six copies of the Connecticut Department of Public Utility Control Petition for Authority to Conduct a Voluntary Unassigned Number Porting Trial.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard

Louise Rickard
Acting Executive Secretary

Enc.

No. of Copies rec'd 2
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)
	)
Petition of the	)
Connecticut Department of Public Utility Control	)
for Authority to Conduct a Voluntary	)
Unassigned Number Porting Trial	)

PETITION OF THE CONNECTICUT DEPARTMENT OF PUBLIC UTILITY CONTROL FOR AUTHORITY TO CONDUCT A VOLUNTARY UNASSIGNED NUMBER PORTING TRIAL

Donald W. Downes
Chairman

Glenn Arthur
Vice-Chairman

Jack R. Goldberg
Commissioner

John W. Betkoski, III
Commissioner

Linda Kelly Arnold
Commissioner

August 10, 2000

Connecticut Department of
Public Utility Control

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)
	)
Petition of the	)
Connecticut Department of Public Utility Control	)
for Authority to Conduct a Voluntary	)
Unassigned Number Porting Trial	)

PETITION OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL
FOR AUTHORITY TO IMPLEMENT
UNASSIGNED NUMBER PORTING

I. Introduction and Summary

By the Federal Communications Commission's (Commission) November 30, 1999 Order, the Connecticut Department of Public Utility Control's (CTDPUC) July 28, 1999 petition requesting additional authority to implement various area code conservation measures was approved.[1] In that Order, CTDPUC was authorized by the Commission to institute thousands-block number pooling; reclaim unused and reserved NXX codes, and portions of those codes; and audit number assignment and utilization requirements.[2]

Following the issuance of the Connecticut Order, the Commission released its Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 99-200, In the Matter of Numbering Resource Optimization (NRO),

[1] CC Docket No. 96-98 and NSD File No. L99-62, In the Matter of Connecticut Department of Public Utility Control's Petition for Delegation of Additional Authority to Implement Area Code Conservation Measures (Connecticut Order), released November 30, 1999.
[2] Connecticut Order, pp. 5-12.

on March 31, 2000. In the NRO, the Commission adopted administrative and technical measures that would allow it to monitor more closely the manner in which numbering resources are used within the North American Numbering Plan (NANP). NRO, ¶5.[3]

Although the Commission intends to address audits, rate center consolidation, ten-digit dialing and the use of technology-specific overlays as a means of delaying NPA and NANP exhaust in future orders,[4] the Commission declined to delegate authority to order Unassigned Number Porting (UNP)[5] to state commissions. The Commission has however, permitted carriers to voluntarily engage in UNP where it is mutually agreeable and where no public safety or network reliability concerns have been identified.[6] In light of the Commission's willingness to permit UNP, CTDPUC suggests that an UNP trial is timely. Such a trial would also provide the Commission with additional information concerning the feasibility of the full implementation of UNP as part of its national numbering resource optimization strategy. Therefore, as discussed in

---

[3] The Commission adopted in part, a mandatory utilization data reporting requirement, a uniform set of categories of numbers for which carriers must report their utilization, and a utilization threshold framework to increase carrier accountability and incentives to use telephone numbers more efficiently. The Commission also adopted a single system for allocating numbers in blocks of 1,000, rather than 10,000 (thousands-block number pooling) and established a plan for national rollout of thousands-block number pooling. Additionally, the Commission established a framework for the selection of a thousands-block Pooling Administrator. Further, the Commission adopted numbering resource reclamation requirements to ensure the return of unused numbers to the NANP inventory for assignment to other carriers. Finally, to encourage better management of numbering resources, the Commission mandated that carriers fill their need for numbers out of open thousand blocks before beginning to use numbers from new blocks to facilitate reclamation. NRO, ¶5.

[4] NRO, ¶9.

[5] UNP involves the porting of unused telephone numbers between one carrier's switch to another carrier's switch and does not involve a pooling administrator. Because UNP involves the porting of telephone numbers between carriers it is imperative that participating carriers be Local Number Pooling (LNP) capable. Consequently, the Connecticut UNP trial would be limited to only participating wireline service providers.

[6] NRO, ¶231.

further detail below, CTDPUC hereby petitions the Commission for the opportunity to conduct a formal industry UNP trial in Connecticut wherein carriers could participate on a voluntary basis.

II. Discussion

The Commission is fully aware of the status of the NANP exhaust and the virtue of implementing whenever possible, various telephone numbering optimization measures to delay numbering plan area (NPA) exhaust. Therefore, CTDPUC will refrain from presenting further discussion concerning the need for state authority to implement telephone numbering conservation measures. With that said however, CTDPUC believes that states should have the ability to implement additional telephone numbering optimization measures to delay area code exhaust. CTDPUC believes that one such optimization measure that is ripe for a formal trial is UNP.

CTDPUC is aware of a recently completed UNP feasibility trial between MCI WorldCom, Inc. (WorldCom) and Focal Communications (Focal). A copy of the report discussing that feasibility trial is appended hereto as Attachment 1.[7] According to the Report, UNP has a coincident benefit to LNP and number conservation methods to make more efficient use of telephone numbers and is a viable method for meeting customer specific and service provider needs.[8] Additionally, WorldCom and Focal have concluded that based on the feasibility

[7] Report on Unassigned Number Porting (UNP) Trial, Focal Communications Corporation and MCI WorldCom (Report).
[8] Report, pp. 2, 9.

trial, UNP appears to be a useful tool in meeting customer specific number requests.[9]

Industry requests for a UNP trial have been received by CTDPUC as early as April 1999 when WorldCom, the New England Cable Television Association and Cox Connecticut Telecom, L.L.C. (Cox) separately requested that CTDPUC order implementation of UNP in Connecticut.[10] Since issuance of the Department's September 26, 1999 Decision in Docket No. 96-11-10, Cox has again petitioned the CTDPUC to conduct a voluntary UNP trial in Connecticut.[11]

CTDPUC has up to this time refrained from ordering UNP in Connecticut because it believed that UNP might involve number administration rather than area code relief, and more importantly, that implementation of UNP would not provide area code relief within the time period that the 203 and 860 NPAs were estimated to exhaust.[12] CTDPUC also recognized that the implementation of UNP would only be limited to LNP-capable carriers where the local number portability technology had been deployed in Connecticut and that implementation also required the ability of automated systems to manage UNP orders.[13]

Subsequent to the issuance of the September 22, 1999 Decision in Docket No. 96-11-10RE1, a number of events have occurred that lead CTDPUC to conclude that a UNP trial would be in the public interest of Connecticut. First, in light of the NRO, the Commission has permitted carriers to voluntarily engage

---

[9] Id., p. 10.
[10] Docket No. 96-11-10RE1, DPUC Review of Management of Telephone Numbering Resources in Connecticut, September 22, 1999 Decision, p. 36.
[11] See Cox's January 17, 2000 and May 16, 2000 requests to the CTDPUC for a Connecticut UNP trial. Copies of the Cox correspondence have been appended hereto as Attachments 2 and 3, respectively.
[12] September 22, 1999 Decision in Docket No. 96-11-10RE1, p. 36.

in UNP.[14] Additionally based on the Connecticut Order, and other Commission Orders delegating authority to various state commissions to conduct telephone number optimization measures wherein the Commission encouraged the voluntary use of UNP, CTDPUC has concluded that UNP is another form of number pooling rather than a form of telephone number administration. Further, due to telephone number rationing and the optimization measures provided for in the Connecticut Order, exhaust of the 203 and 860 NPAs has been extended beyond the dates initially noted during Docket No. 96-11-10RE1. CTDPUC is also of the opinion that a UNP trial would further delay exhaust of the 203 and 860 area codes and ultimately, the introduction of two new NPAs in Connecticut. Moreover, as LNP has been fully deployed for wireline service purposes within Connecticut since year-end 1999, all wireline providers offering service in Connecticut will have an opportunity to participate in the trial, regardless of the location of their switch. Finally, based on the feasibility trial results discussed in the Report, CTDPUC believes that automated systems appear to be in place that would permit participating carriers to process UNP orders in an efficient manner with little error. These systems should minimize the customer confusion issues raised by CTDPUC in its September 22, 1999 Decision in Docket No. 96-11-10RE1.

CTDPUC is appreciative of the authority previously granted by the Commission to implement the telephone number optimization measures provided for in the Connecticut Order. Nevertheless, in light of those measures, telephone

---

[13] Id.
[14] NRO, ¶231.

number exhaust in the 203 and 860 NPAs continues. Additional telephone number optimization measures are in the public interest and should be permitted when conditions warrant. CTDPUC's concerns raised in the September 22, 1999 Decision in Docket No. 96-11-10RE1 have been addressed and industry interest for a Connecticut UNP trial is present. Therefore, based on the above, CTDPUC concludes that this is the appropriate time to implement additional telephone number optimization measures in Connecticut.

Accordingly, CTDPUC hereby requests that the Commission approve this petition and permit the implementation of a voluntary UNP trial in Connecticut. If permitted to conduct a voluntary UNP trial, CTDPUC proposes to conduct the trial under the Commission's supervision. CTDPUC also commits to providing the Commission all results of the trial so that they could be analyzed in the hope that UNP can be implemented on a national basis.

III. Conclusion

NPA exhaust continues despite the telephone number optimization measures permitted by the Commission. Additional optimization measures are necessary to further postpone area code exhaust and ensure that telephone numbers are assigned in an efficient manner. UNP appears to be an additional measure by which this goal can be met. The Commission has encouraged the states to continue studying UNP. In the opinion of CTDPUC, a formal voluntary UNP test would provide the State of Connecticut additional measures by which assignment of telephone numbers would be optimized while providing the

Commission with the necessary information addressing the practicality of implementing UNP in other jurisdictions. Accordingly, the Commission should grant the instant petition.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF
PUBLIC UTILITY CONTROL

Donald W. Downes
Chairman

Glenn Arthur
Vice-Chairman

Jack R. Goldberg
Commissioner

John W. Betkoski, III
Commissioner

Linda Kelly Arnold
Commissioner

August 10, 2000

Connecticut Department of
Public Utility Control
Ten Franklin Square
New Britain, CT 06051

CERTIFICATION

_____

Miriam L. Theroux
Commissioner of the Superior Court

ATTACHMENT 1

Report on

Unassigned Number Porting (UNP) Trial

Focal Communications Corporation

and

MCI WorldCom

FOCAL™

Local without limits™

MCI WORLDCOM

Executive Summary

MCI WorldCom and Focal Communications herein present the details concerning a recently completed feasibility trial concerning Unassigned Number Portability between the parties. This report has been provided to assist industry in understanding the intent, purpose, scope, and test results for this trial.

Unassigned Number Portability, or UNP, has a coincident benefit to Local Number Portability and number conservation methods to make more efficient use of telephone numbers. As noted by the FCC in its Number Conservation Notice of Proposed Rulemaking (CC Docket 99-200), the key matter for the number conservation docket is "two-fold: to slow the rate of number exhaust in this country as evidenced by the ever-increasing rate at which new area codes are assigned; and to prolong the life of the North American Numbering Plan (NANP)."[1]

Focal and MCI WorldCom agree with this premise and cooperatively embarked on an initiative to understand the aspects of inter-company processes to affect the porting of spare numbers from existing carrier number inventory. The conclusion of this effort demonstrates that cooperation is key towards making UNP viable. In that the porting of spare numbers was demonstrably intended to facilitate the porting of small (or low) volumes of spare numbers, the results of this trial are not deemed by the parties as threatening to number raids for building ones number inventory to the detriment of the other carrier. Conversely, the parties have concluded that instead, the facility and availability of UNP processes are mutually beneficial to serve customer desires to be served by the carrier of their choice (i.e., access to numbers), while at the same time improving the efficiency of how numbers already assigned to carriers are utilized.

The trial focused on two UNP uses: (1) the porting of numbers from one carrier switch to the other carrier's switch to serve a specific customer request; and (2) the porting of numbers from one carrier switch to the other carrier's switch to establish a footprint within a rate area not currently served by the requesting carrier. The footprint method was intended to port a limited quantity of numbers for services that require only a small quantity of numbers to serve a rate area.[2] The intent of this trial was not to focus on using UNP for on-going inventory building.

---

[1] See, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200; Connecticut Department of Public Utility Control, RM No. 9258, Petition for Rulemaking to Amend the Commission's Rule Prohibiting Technology-Specific or Service-Specific Area Code Overlays; Massachusetts Department of Telecommunications NSD File No. L-99-17 and Energy Petition for Waiver to Implement a Technology-Specific Overlay in the 508, 617, 781, and 978 Area Codes; California Public Utilities Commission and the People, of the State of California Petition for Waiver to Implement a Technology-Specific or Service-Specific Area Code NSD File No. L-99-36, Notice of Proposed Rulemaking at 1 (1999).

[2] A full NXX and/or a 1000s block would have provided more numbers than required to provide the intended service.

UNP was used in the Chicago, New York, and Los Angeles LATAs to perform the trial tests. In Chicago, a footprint was established for Focal in the CHICGOZN09 rate area using numbers from MCI WorldCom's number inventory. In New York and Los Angeles, spare numbers were ported bi-directionally between Focal and MCI WorldCom to confirm the utility of serving specific number requests.

The parties held four meetings to establish the ordering process. The Ordering and Billing Forum (OBF) Local Number Portability (LNP) Local Service Request (LSR) forms were used and modified to serve as a unique and distinct signal from typical LNP orders. Minor changes were agreed to define and establish UNP request nomenclature annotated in the "Remarks" field of the LSR. After the development of the order processes, the numbers were ported and tested in the same context of that used for LNP. Standard order processing intervals were used to conduct the test and were able to be met by both Service Providers. The resulting test calls were successful, proving that both Service Providers had taken the appropriate actions to turn-up the number ranges in their networks.

Introduction

This report describes the process used between Focal and MCI WorldCom to complete a feasibility trial for the porting of Unassigned Number Portability (UNP). UNP as used in this document refers to the porting of "spare" or unused telephone numbers between one carrier switch to another carrier switch. This process allows for the number(s) ported to be used by the recipient carrier. In this trial the usage of the UNP numbers was using a process that would satisfy: (1) the porting of spare numbers that would be used by the gaining carrier to serve a particular end-user customer and fulfill that customer's specific request for a number(s); and, (2) porting of a small quantity of numbers to establish a footprint presence.

Purpose of Document

This document is a report of the UNP trial activities between Focal Communications and MCI WorldCom. The intent of this report is to discuss the preparations for, and activities associated with commencing and executing the trial. In addition, this report outlines the various test activities performed to demonstrate the feasibility of the trial.

UNP Test Planning/Preparation

Focal and MCI WorldCom determined the applicable scenarios that would drive a need for a UNP request from one Service Provider to another. These scenarios were customer-specific needs and footprint needs. The customer-specific scenario fell into three categories: (1) requesting a specific TN/range; (2) requesting any TN/range within a particular NPA-NXX or containing specific digits in the NXX-XXX; (3) requesting any TN/range within a particular rate center. The footprint scenario was determined to be

addressed by the above scenario of requesting any TN/range within a particular rate center.

The basic difference between Unassigned Number Porting and Local Number Portability is the fact that the donating Service Provider has the TN/range available in their inventory rather than reserved or assigned to a customer. With this in mind, it was Focal and MCI WorldCom's objective to make the UNP process as consistent with LNP as possible, allowing for the fact that each Service Provider maintains it's number inventory differently. The process agreed upon follows the precepts of the Local Service Request (LSR) process, allowing Service Providers to participate in UNP and leaving any potential adjustments to the management of their individual number inventories up to themselves. The process developed for the trial assumed that carrier number inventory modifications to support LNP, that is the ability to mark a number as no longer in its inventory, was present. This was confirmed and is deemed as present among all LNP-capable carrier systems in order to indicate that a number is no longer available for assignment. In addition, the trial required that numbers from non-native NXXs could be accommodated by number inventory systems. Some carriers may not have implemented the functionality when LNP was being implemented, and are now implementing internal system changes to support drawing non-native numbers into their systems for number pooling. In any event, the number inventory capability mentioned here can be assumed available in areas that are and will be supporting number pooling.

The activity thus focused on minor changes to ordering procedures and interaction. The remainder of the process was identical to any other number being ported. No additional LNP process changes, beyond slight modifications to allow number availability interactions per the Local Service Request OBF form were required. In addition, at no time during the course of the trial did the parties find it necessary or required to activate the numbers as working numbers in its network before being able to port them.

Customer Specific Scenarios

For customer-specific scenarios, it was decided that a Reservation LSR, titled, "Reservation LSR for UNP," would first be sent from the requesting Service Provider to the donating Service Provider. Based on experience gained in the trial, a maximum quantity of 25 numbers should apply to UNP requests. The parties identified the minimum set of fields required to be populated on the LSR (for simplicity purposes). In addition, as defined below, the parties developed a set of common comments in the "Remarks" portion of the LSR to denote specifics of the type of UNP request (i.e., requesting a specific TN/range, requesting any TN/range within a particular NPA-NXX or containing specific digits in the NXX-XXX, or requesting any TN/range within a particular rate center).

1. Requesting a specific TN/range

2. Requesting any TN/range within a particular NPA-NXX or containing specific digits in the NXX-XXX

3. Requesting any TN/range within a particular rate center[3]

If the donating Service Provider could accommodate the request (i.e., number was available), the TN/range would be reserved for the requesting Service Provider, and a Firm Order Commitment (FOC) would be returned to the requesting Service Provider, with a tracking number. The requesting Service Provider would then proceed to process an LNP order for that TN/range, and at the appropriate time in the order processing, send a typical LNP LSR for that customer, using the tracking number from the Reservation LSR FOC, requesting a date certain, consistent with customer cut-over plans. At that point, normal LNP procedures would be used and a second FOC returned from the donating Service Provider. The donating, (losing SP, optionally), and requesting (gaining SP) Service Providers would proceed with sending Create messages to the Number Portability Administration Center (NPAC) system, followed by the requesting Service Provider sending an Activate message to the NPAC at the appropriate time.[4] Line Information Data Base (LIDB), Customer Account Record Exchange (CARE) and Directory Assistance/Directory Listing (DA/DL) activities would also be processed normally. The only difference from LNP in this UNP transaction would be that the 911 record request would be processed as "new" rather than as a "migrate" transaction[5].

Following this process ensures that, like LNP, which is also customer-specific, if the customer were to give up the TN/range, the TN/range would be processed as a snap-back to the donating Service Provider.

Footprint Scenario

For the footprint scenario, which was determined to only have the characteristic of requesting any TN/range within a particular rate center, it was agreed that a regular LNP LSR with a slight change to the title (Local Service Request - UNP) would be sent from the requesting Service Provider, specifying comments in the Remarks portion of the order that it was a footprint UNP request. The comment would specify the rate center desired and the quantity of the range. Therefore the added step of transmitting a Reservation LSR was not required for footprint requests. Based on experience gained in the trial, a maximum quantity of 25 numbers should apply to UNP requests. Then, if the donating Service Provider has a range available, they would assign it to the requesting Service Provider, and send a FOC back, annotating the range and the date they could be made available. The requesting Service Provider would build the range into their switch, then send a Create message to the NPAC (and optionally, the donor Service Provider),

---

3 In an environment where multiple potential donors exist, this could be an "ambiguous donor" UNP Request. For the purposes of the trial, it was assumed that the ambiguity was removed per the customer requesting the numbers from a particular donor.

4 The carrier messages to the regional NPAC system noted herein are not UNP unique. They are identical to the messaging required for porting any number.

5 LNP transactions are processed as "unlock" and "migrate" transactions. Being that no prior record existed, a "new" 911 transaction is appropriate.

followed up by an Activate message. Meanwhile, the donor Service Provider would remove the numbers porting from their number inventory. The requesting Service Provider would then be able to activate the numbers in the NPAC and make use of that range of numbers. The TNs from that range would be managed for new customer service requests, equivalent to all new service orders. The benefit here is that the service provider is able to service small volume number needs without requiring a full NXX or even an NXX-X block assignment.

As a matter of policy, the donating service provider in the footprint scenario would not be receiving the number(s) back if the customer assigned the number in the requesting company's network disconnected the number. This is because the numbers were ported to meet a footprint need with a limited set of numbers. With such a limited number range, it is impractical to return the numbers is disconnected by the customer since to do so might simply trigger additional and unnecessary UNP requests. However, control over the snap-back procedure would be the responsibility of the requesting company, since neither the NPAC LNP system nor the original donating company systems would uniquely identify these number as footprint TNs not expected for return if snapped back. It is also important to note that if the range (or TNs within that range) are used for a customer, and the customer subsequently ports to another Service Provider, and that customer were to then terminate their service, a snap-back would occur, and the NPAC rules would show them as being returned to the donating Service Provider, not the requesting Service Provider. Therefore, the requesting company would need to control the snap-back prevention in their network.

For the purposes of this trial, Focal and MCI WorldCom spread out the testing into three NPAC regions, the Northeast, the Midwest and the West Coast. The scenarios used included requesting a specific TN/range and requesting any TN/range in a particular NPA-NXX to meet the customer-specific need, and requesting any TN/range in a particular rate center to meet the footprint need.

UNP Test Execution

Focal and MCI WorldCom agreed to conduct the trial using a range of five telephone numbers for the customer-specific scenarios and a range of 20 telephone numbers for the footprint scenario. The customer-specific scenarios were requested in Los Angeles and New York and the footprint scenario was requested in Chicago. The footprint scenario required the ability for the numbers to be placed into inventory and thus be assignable for customer service. The numbers ported during the trial are in use today by Focal for actual customer use. Below are the scenarios used.

- Los Angeles (customer-specific)
    - Range of 5 TNs - Focal to MCI WorldCom (range from a specific NPA-NXX)
    - Range of 5 TNs - MCI WorldCom to Focal (specific range of TNs from any NPA-NXX)

- New York (customer-specific)
  - Range of 5 TNs - Focal to MCI WorldCom (any range from a specific rate center)
  - Range of 5 TNs - MCI WorldCom to Focal (specific range of 10-digit TNs)
- Chicago (Service Provider footprint needs)
  - Range of 20 TNs from MCI WorldCom to Focal (any range from a specific rate center)

The process followed by Focal and MCI WorldCom is outlined below. This process was used by the groups within each Service Provider that normally process LNP orders and are already familiar with the LSR and SOA/NPAC processing.

Requesting SP - Customer-Specific UNP

1. Send Reservation Local Service Request (LSR) for UNP
2. Receive Firm Order Confirmation (FOC) that TNs reserved for requesting SP
3. Send LSR for UNP w/tracking number from previous FOC and customer due date
4. Upon receipt of FOC, send Create message to NPAC
5. On customer due date, send Activate message to NPAC
6. Make test calls from major carriers (ILEC, AT&T LD, Sprint LD, MCI LD)
7. Make test calls from within new receiving switch
8. Have donating SP make test calls from donor switch
9. Verify all test calls complete to receiving switch (new requesting SP)

Donating SP - Customer-Specific UNP

1. Receives Reservation LSR for UNP
2. Return confirmation (FOC) that TNs reserved, w/ tracking number
3. Receives LSR for UNP w/tracking number from previous FOC and customer due date
4. Return FOC for LSR for UNP

5. Send Create concurrence message to NPAC

6. Make test calls, per new SP, from donor switch

Requesting SP – Footprint UNP

1. Send Local Service Request – UNP LSR

2. Receive Firm Order Confirmation (FOC) that TNs reserved for requesting SP

3. Upon receipt of FOC, send Create message to NPAC

4. On customer due date, send Activate message to NPAC

5. Make test calls from major carriers (ILEC, AT&T LD, Sprint LD, MCI LD)

6. Make test calls from within new receiving switch

7. Have donating SP make test calls from donor switch

8. Verify all test calls complete to receiving switch (new requesting SP)

Donating SP – Footprint UNP

1. Receives LSR for UNP

2. Return confirmation (FOC) that TNs reserved, w/ tracking number

3. Send Create concurrence message to NPAC (LNP process proceeds normally)

4. Make test calls, per new SP, from donor switch

While no need arose in this portion of the activity in the context of proper processing of the LSR and moving the number from available to removal within the number inventory systems, the parties contemplate that this might occur in some cases, or be cause for concern by some parties. Creation of a pseudo account for the carrier to lodge UNP requests against was seen as a potential solution so the LSR was not rejected because of their being no customer service record associated with the telephone number. However, it's not clear why this is an expressed limitation by some parties in that donations of numbers to a pooling administrator in a number pooling environment would seem equivalent to controls necessary in a number inventory control system. The pseudo account is suggested as a means to hold the UNP reservation so that the subsequent LNP request is not impeded.

At the conclusion of testing, as agreed by both Focal and MCI WorldCom, the TN/ranges used for Los Angeles and New York (customer-specific scenarios) were processed as snap-backs. This was accomplished by sending Disconnect messages to the NPAC. This ensured calls were routing back to the donating service provider. The reservations and/or assignments were removed from each donating Service Provider's number inventory system to allow for subsequent customer use.

Certain scenarios, ancillary services processing and associated test calls were not deemed instrumental to UNP. These were not unique to UNP and had been tested extensively during LNP Industry Field Trials in 1997/1998 and are used in LNP processing today. Therefore, Focal and MCI WorldCom decided that the items below did not require testing:

1. Winback scenarios;
2. Subsequent porting scenarios;
3. LIDB, CARE, DA/DL, 911 request processing;
4. Outgoing test calls to Directory Assistance or 911;
5. Incoming test calls with 0+, Collect.

UNP Test Results

The results of the trial were completely successful and proved that with minimal modifications to the LSR process and forms, that UNP is a viable method for meeting customer-specific needs as well as for Service Provider footprint needs.

The basic element deemed necessary for an LNP-capable service provider is the ability to "mark" an available non-working telephone number as ported out. An equivalent nomenclature could be to make the number unassignable. The key is that once UNP is performed with another service provider, the number must not be placed in general number inventory for reassignment unless snapped back from the NPAC. The parties viewed this telephone number resource marking function as no different than the functionality required to identify numbers as ported out or donated for pooling. In both cases plus UNP, the number is no longer assignable by the donating service provider.

In addition, it was not required to first activate the number and then port it away for the purposes of facilitating UNP. If activating spare numbers before porting is a true criteria or requirement, then it follows that the criteria to always require activation before porting, is also required for number pooling. However, this constraint has not yet been suggested as required in number pooling processes.

Focal and MCI WorldCom agreed that with minimal education to operations groups that process LNP requests as well as the Sales organizations, UNP could be made available as another TN resource by Service Providers.

The attached spreadsheet depicts the specific TN ranges that were processed as UNP, the relevant dates for the activities, test calls that were made following the activation of the TN ranges, and the subsequent snap-backs that occurred for the customer-specific scenarios.

Conclusion

The trial results yielded in the scenarios described above clearly indicate that UNP is feasible. The trial confirmed initial assumptions that with minor changes to ordering processes between carrier, that UNP processes were very similar in nature to Local Number Portability (LNP) procedures. LNP procedures are mature between wireline carriers and thus serve to simplify the UNP process in general.

In addition, the UNP processes used for the trial were determined to have utility for the form of UNP contemplated by the parties. That is, UNP requests when the donor is unambiguous for meeting specific customer requests and providing a limited set of numbers for meeting carrier footprint needs. In these cases, and applied as tested, there was no identified need for a 3rd party administrator. Further, based on experience gained in the trial, a maximum quantity of 25 numbers should apply to UNP requests.

Further, if UNP requests were extended to the ambiguous donor application – for example, a number need within the NPA or any number within the rate area with multiple possible donors, and if the carrier (UNP donor) was not specified by a customer, or could not be because the request was for footprint, then a 3rd party administrator may be required to balance the donations. Considering though the limited volume proposed and frequency of application, and in keeping with state regulator involvement concerning number conservation, it may be possible for the state staffs to serve as the arbiter of these ambiguous donor UNP requests.

The LSR interface, using FAX or e-mail was also deemed sufficient. We also concluded that because of the low volume anticipated in the unambiguous form of UNP tested herein, that electronic interfaces between the parties were not required, nor deemed necessary for furthering UNP use within the industry.

Finally, at no time during the course of the trial did the parties find it necessary or required to activate the numbers as working numbers in its network before being able to port them.

Focal and MCI WorldCom see the availability of UNP processes as described herein as being a useful tool in meeting customer-specific number requests. The facility and availability of these UNP processes are mutually beneficial to serve customer desires to be served by the carrier of their choice (i.e., access to numbers), while at the same time improving the efficiency of how numbers already assigned to carriers are utilized.

The parties recommend that an industry ad-hoc group be convened among carriers who have an interest in learning more on how this trial occurred and how it can be used to expand the concept used here to facilitate further UNP activity.

Attachments

LSR forms, test call logs.

Testing Log for Focal/MCI Worldcom UNP Trial

						Order Procedures		NPAC Procedures				
NUMBERS	MARKET	RATE CENTER	DONATING CARRIER	RECEIVING CARRIER	TYPE OF PORT	LSR sent	FOC received	CAO sent	CAL sent	Activated	Test Calls made *	Snap-back occurred
773-359-8100-8119	Chicago	CHICGOZN09	MCI	Focal	Footprint	11/15/1999	11/18/1999	11/18/1999	11/19/1999	11/22/1999	All successful	N/A
213-337-0020-0024	Los Angeles	LSAN DA 01	MCI	Focal	Customer Specific	11/15/1999	11/16/1999	11/18/1999	11/19/1999	11/22/1999	All successful	12/19/1999
212-299-0375-0379	New York	NWYRCYZN01	MCI	Focal	Customer Specific	11/15/1999	11/19/1999	11/22/1999	11/19/1999	11/22/1999	All successful	12/19/1999
646-435-0368-0372	New York	NWYRCYZN01	Focal	MCI	Customer Specific	11/18/1999	11/19/1999	11/23/1999	11/23/1999	11/23/1999	All successful	01/06/2000
213-596-0050-0054	Los Angeles	LSAN DA 01	Focal	MCI	Customer Specific	11/18/1999	11/18/1999	11/23/1999	11/23/1999	11/23/1999	All successful	01/06/2000

* Test calls were made across three LD carriers (AT&T, Sprint, MCI), regional ILEC, Focal and MCI Local (donor and recipient switch)

Comments
none
number available for reassignment
number available for reassignment
number available for reassignment
number available for reassignment

North American Numbering Council
March 21-22, 2000 Meeting
Washington, DC

Unassigned Number Porting
Trial Report

Focal Communications and MCI WorldCom

Dan Meldazis
Focal
312-895-8272
dmeldazis@focal.com

Jim Joerger
MCI WorldCom
972-656-5084
jim.joerger@wcom.com