

# Two UNP Scenarios Tested

**Scenario One:** Specific customer requests to port unassigned numbers from one carrier to another

**Scenario Two:** Establishing carrier footprints with small quantities of numbers

Scenarios tested in three major cities with forty numbers

# What UNP Should and Should Not Do

- Moves spare numbers between carriers
- Benefits competition and conservation
- Use for specific customer requests
- Use to establish rate area footprint
- Limit 25 numbers per request
- Not intended for inventory building

# Key Goals of Trial

- Demonstrate current LSR process can handle UNP
- Determine third party administrator is not needed
- Ensure LNP supports porting spare numbers
- Show that systems can reserve and donate numbers
- Determine if number needs to be activated
- Test specific UNP customer request scenario
- Test UNP carrier footprint scenario

# General Findings

- Determined LNP systems can support UNP ports
- If carrier can mark working numbers as ported out, it can mark numbers UNP-ported out
- Donor carrier needs to be unambiguous
- Carrier can support UNP if OSS supports pooled port-ins
- Pooling should enable widespread UNP

# LNP Inter Carrier Processes Support Customer Specific UNP Scenario

- Standard LSR with annotated remarks is sufficient
- LSR can be FAX or e-mail transmission
- Firm Order Confirmation process unchanged
- No change to LIDB, CARE, DA/DL
- Receiving Carrier processes new 911 record

# LNP Inter Carrier Processes Support Footprint UNP Scenario

- Standard LSR with annotated remarks is sufficient
- LSR can be FAX or e-mail transmission
- No change to Firm Order Confirmation process
- No change to LIDB, CARE, DA/DL updates
- Receiving carrier processes 911 records as “new”
- No snap-back required as number stays in inventory

# Conclusions and Next Step

- UNP is feasible
- Interactions between provisioning groups successful
- Should set 25 TN limit per request
- Donor needs to be unambiguous
- No need to activate numbers before porting
- Do not need third party administrator
- All test calls completed without difficulty
- Next Step: Ad-hoc UNP meeting

# Reservation Local Service Request for UNP

BA-N  
(10-97)

## Administrative Section

|          |                     |                           |      |                                      |                   |                 |                   |  |                              |      |        |       |        |
|----------|---------------------|---------------------------|------|--------------------------------------|-------------------|-----------------|-------------------|--|------------------------------|------|--------|-------|--------|
| AN       | CCNA<br><b>FOC</b>  | PON<br><b>UNPSAMPLE-4</b> | ATN  | SC                                   | VER<br><b>PRE</b> | LSR NO          | PG<br><b>1</b>    | OF<br><b>1</b>                           | D/TSENT<br><b>1999-09-27</b> |      |        |       |        |
| DDD      | APPCODE             | DDDO                      |      | APPTIME                              | DFDT              | PROJECT         |                   |  |                              |      |        |       |        |
| CHC      | REQTYP<br><b>CB</b> | ACT<br><b>V</b>           | SUP  | EXP<br><b>Y</b>                      | AFO               | RTR<br><b>C</b> | CC<br><b>7058</b> | AENG                                     | ALBR                         | SCA  | AGAUTH | DATED | AUTHNM |
| ACTL     |                     | AI                        | APOT |                                      |                   | LST             |                   | LSO                                      |                              | TOS  | SPEC   |       |        |
| NCI      |                     | CHANNEL                   |      | SEC NCI                              |                   | RPON            |                   |  |                              | RORD |        |       |        |
| LSP AUTH | LSP AUTH DATE       |                           |      | LSP AUTH NAME<br><b>Dan Meldazis</b> |                   | CIC             |                   | CUST<br><b>FOCAL COMMUNICATIONS CORP</b> |                              |      |        |       |        |

## Bill Section

|                                      |                              |                                 |                       |                         |                       |
|--------------------------------------|------------------------------|---------------------------------|-----------------------|-------------------------|-----------------------|
| BI1                                  | BAN1                         | BI2                             | BAN2                  | ACNA<br><b>FOC</b>      | EBD                   |
| BILLNM                               |                              | SBILLNM                         |                       | TE                      | EBP                   |
| BILSTREET<br><b>200 N LASALLE ST</b> |                              | BFLOOR<br><b>7</b>              | BILROOM<br><b>700</b> | BCITY<br><b>CHICAGO</b> | BILSTATE<br><b>IL</b> |
| BILZIP<br><b>60601</b>               | BILLCON<br><b>JAN HEWITT</b> | BCTEL NO<br><b>312-895-7934</b> |                       | VTA                     |                       |
| SUMBILLNUM                           | SBCUSCODE                    |                                 |                       |                         |                       |

## Contact Section

|                                 |   |  |
|---------------------------------|---|--|
| INIT<br><b>DEBRA MONTGOMERY</b> | INITTEL NO<br><b>312-895-7937</b>               | E-MAIL<br><a href="mailto:demontgomery@focal.com">demontgomery@focal.com</a> |
|                                 | FAX NO<br><b>312-895-8417</b>                   | INITSTREET   |
| INITFLOOR                       | NITROOM   | INITCITY   |
|                                 |   | INITSTATE  |
|                                 |   | INITZIP  |
| IMPCON<br><b>Focal Switch</b>   | IMPTTEL NO<br><b>312-895-8300 (0700 - 1700)</b> | IMPPAGER   |
| ALT IMPCON                      | ALT IMPCOM TEL NO                               | ALT IMPCON PAGER NO  |
| DSGCON                          | DRC   | DCTEL NO   |
|                                 |   | DCFAX NO   |
|                                 |   | DCSTREET   |
| DCFLOOR                         | DCROOM  | DCCITY   |
|                                 |   | DCSTATE  |
|                                 |   | DCZIP  |
|                                 |   | OPRSVC   |

## Remarks

Customer Reservation UNP \_\_\_\_\_ (LSR to follow) Reference Number: \_\_\_\_\_ Date: \_\_\_\_\_

REQUESTING: RC: Lincolnwood, IL NPA/NXX: XXX-XXX TN: XXX-XXX-XXXX RC/LAST 4 DIGIT: Lincolnwood, IL / 4000

Reason for Denial: Number is Assigned \_\_\_ Number is not in Inventory \_\_\_



February 18, 2000

**TO:** John R. Hoffman  
Chairman  
North American Numbering Council

**FROM:** Carrington Phillip  
V.P. Regulatory  
Cox Communications

**RE:** Unassigned Number Porting (UNP) Policy Issues

The North American Numbering Council (NANC) has asked the Industry Numbering Committee (INC) for a work plan on UNP. INC will report on its status at the NANC March meeting. There are obvious policy issues inherent to UNP that are most appropriately addressed by NANC. Though INC eventually brings policy questions to the NANC, it would be more efficient to address at least one overarching issue now. *The circumstances for UNP implementation should not be limited to extreme cases.* Having NANC provide guidance on this fundamental policy will enable INC to better focus its work plan.

**Policy Issue for NANC Consideration:** Circumstances under which UNP is Utilized

UNP as described in the NRO report of 1998 is limited to cases of extreme jeopardy. While that is a valid use of the technology, it is difficult to justify a national plan and the costs associated with administration of UNP for the relatively small number of situations of extreme jeopardy, where carriers cannot get resources. Unrestricted UNP, however, meets two objectives of federal numbering policy. First, UNP benefits numbering resources optimization.

- . UNP can extend the life of area codes by breaking down the range of numbers assigned to a carrier to a quantity much smaller than in thousands block pooling (1-999).
- . UNP is an individual telephone number based measure that can “liberate” potentially stranded numbers.
- . UNP can reduce code or block openings for specific customer needs.
- . UNP could reduce customer reliance on reserved numbers.

Second, and arguably more importantly, UNP benefits competition. This is a critical factor because, at its core, Federal Communications Commission (FCC) policy on competition is to encourage choice and remove barriers. The Commission attempted to lift a barrier to choice created by telephone numbers when it ordered Local Number Portability (LNP). But LNP removes just one barrier that numbers can create; end user choice is unrestricted only if they first initiate service with the service provider who controls the telephone number they desire. UNP

extends the LNP concept to all available numbers, for all situations in which a customer's choice would otherwise be limited artificially by numbering policy.

It's important to note that "desirable numbers" fall in a broad range. Some might argue that there exists only a handful of desirable number because they limit the definition to numbers ending in 000, for example, or repetitive numbers. Today, an end user might simply desire to have numbers in a given NPA-XXX. The FCC previously recognized the similar anti-competitive impact of overlays on new entrants—end user consumers would prefer the existing NPA. UNP is another step toward minimizing any competitive benefits providers accrue by controlling what are really public numbering resources.

In summary, UNP has important benefits both for competition and for numbering resources optimization. The NANC should recommend to the INC a policy that utilization of UNP, once ordered by a regulatory body with appropriate authority, should not be limited. The NANC should note for INC that the basic technology platform for UNP is LNP, and that UNP can only be deployed where LNP has been deployed. Lastly, NANC should ask INC to write guidelines that encourage participation and limit abuse and which produce end user access to any available telephone number.



f. Responses to Interrogatories

1) List each Interrogatory response by abbreviated prefix and number.

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g. Late-Filed Exhibits

List each Late Filed Exhibit number being submitted in this filing.

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h. Briefs

i. Reply Briefs

j. Exceptions and/or Oral Arguments

1) Request Orals

2) Do not request Orals

k. Compliance Filing:

Indicate Order #(s)

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l. Other (Please Identify):

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6) Is material included for which filer seeks protected status? Yes  No

If so, is a Motion for Protective Order included? Yes  No

7) Indicate number of copies being submitted:

Original + 13

Does it include bulk? yes  no

If Yes, How many copies: \_\_\_\_\_

8) Electronic Filing

By Diskette

By pcANYWHERE Network Filing

Complete the following table, which will serve as an index for electronic filings.

(If using MS Word 6.x or greater, place cursor in last cell and press "Tab" to insert more rows.)

| Cox Connecticut Telcom, L.L.C. – Docket No. 96-11-10 REO3 |                  |                         |  |
|---|------------------|-------------------------|--|
| <u>Electronic Transfer Date or # of Diskettes</u>         | <u>File name</u> | <u>Software/version</u> | <u>File description (if necessary)</u> |
| 1 of 1  | 961110fs.cor     | Word 97                 | Docket Filing Sheet                    |
|   | 961110ltr.cor    | Word 97                 | Letter to Secretary Rickard            |

**ATTACHMENT 2**

January 17, 2000

**VIA AIRBORNE EXPRESS**

Ms. Louise Rickard  
Acting Executive Secretary  
Connecticut Department of  
Public Utility Control  
10 Franklin Square  
New Britain, Connecticut 06051

Re: Docket No. 96-11-10 – RE03 DPUC Review of Management  
Of Telephone Numbering Resources in Connecticut –  
Conservation Measures

Dear Secretary Rickard:

On behalf of Cox Connecticut Telcom, L.L.C. ("Cox"), enclosed please find an original and eleven (11) copies of this response to Commissioner Goldberg's "on the record request" tendered during the Department of Utility Control's ("Department's" or "DPUC's") technical conference, held December 20, 1999, in the above-referenced docket.

The Department petitioned the Federal Communications Commission ("FCC"), on July 28, 1999, for a Waiver of §52.19 requesting additional authority from the Commission to implement various telephone number ("TN") conservation measures to forestall the need for area code relief. The FCC responded with an Order, released on November 30, 1999, that authorized the Department to: mandate thousands-block pooling trials; reclaim unused and reserved NXX codes and portions of those codes; and audit carrier's TN assignment and utilization processes and results. The Department did not request in its petition, nor did the FCC address in its Order, the issue of unassigned telephone number porting between carriers within a rate center.

On December 8, 1999, the Department issued a "Notice of Technical Meeting" to be held on December 20, 1999 to allow for presentations to address the FCC's November 30, 1999 Order. Cox made an oral presentation and distributed a written version of its presentation to the Department and the Parties.

The Cox presentation recommended the adoption of unassigned telephone number porting ("UNP") between carriers and within a rate center as an efficient TN conservation method and stated further that at least one incumbent local exchange company ("ILEC") is on record as having performed intra-company porting within the same rate center – essentially the same process as UNP. The Department inquired whether Cox believed that the FCC's

November 30, 1999 Order was sufficiently broad to allow the Department to conduct a trial of UNP. Cox indicated that it believed the FCC would sanction such a trial. The Southern New England Telephone Company (“SNET/SBC”) offered the opinion that no carrier had ever done UNP and that none of the SBC companies (SWBT, Pacific Bell, Nevada Bell, and SNET) had ever engaged in intra-carrier UNP.

Cox offered to submit a response to the Department documenting its belief that the Department has the authority to order a trial of UNP as a TN conservation measure. This letter provides that response.

### Unassigned Number Porting – Impacts and Results

Currently, when a customer migrates from one number portability capable carrier (“the old carrier”) to another (“the new carrier”) and wishes to keep his existing telephone number, that number is ported to the new carrier through the local number portability (“LNP”) process. That process is currently available only if the customer remains at the same geographic location or, if moving, moves within the boundaries of the same serving rate center area. The result of this LNP process is that a customer has changed carriers, but no new TN has been assigned. This process therefore helps to conserve the TNs in the new carrier’s inventory of TNs. More importantly, from a TN conservation viewpoint, if the new carrier has not opened an NXX in the rate center in which the customer resides, the porting process avoids the need for that new carrier to do so and to lock up the 10,000 TNs in an NXX to serve only one customer.

If, however, the customer also wants a second line, or if the new carrier wishes to serve a customer that is newly moving in to the area and has no existing service, the new carrier is required to “lock up” in that rate center an entire NXX to provide this minimal level of service. Given that there are a number of competing carriers serving many rate centers, this problem of “locking up” NXXs is driving NPAs to exhaust. One solution is to use more efficiently the TNs that are already “locked up” in that rate center by allowing access to the “virtual pool” of existing TNs to all carriers through number porting. The ILECs, who hold the vast storehouse of available TNs in most rate centers, have consistently opposed releasing that inventory to competitors and have cited technical, operational, and economic reasons for being unable to do so. These arguments boil down to one basic point: the ILECs have not pooled numbers before, therefore the system for doing it is not in place, and therefore it cannot be done using existing systems and procedures.

At least three examples can be used to illustrate that the porting of unassigned numbers is feasible as a means of TN conservation. The first example would involve simply assigning a name, for example, Mr./Ms. Smith, to the TN to be ported in the ILEC system. Upon porting the TN it is assigned to the “new” carrier’s customer Mr./Ms. Smith. The second, and more compelling instance, is that under the current technical specifications for one-thousand block pooling, the TNs are ported individually, one unassigned number at a time, into the new carrier’s data base. The third instance is that, despite SNET/SBC’s denial, Pacific Bell is on record as having admitted it ports unassigned numbers intra-carrier. These ports use the same process as is needed for the inter-carrier unassigned number porting trial suggested by Cox to the Department.

SNET’s Affiliate, Pacific Bell, Engages in Intra-Company Porting, Essentially the Same Process as UNP

SNET/SBC's witness, Mr. Bruce Adair, stated on the record at the technical meeting that none of SBC's affiliated companies has ever engaged in intra-company porting, and that it is not possible to port unassigned numbers. See Technical Meeting Transcript, December 20, 1999, at 1466, Lines 14 – 25, and 1467, Lines 1-15. This is untrue. In fact, at a statewide industry planning meeting held September 16, 1999 in San Ramon, California, a Pacific Bell representative stated that in some situations, when Pacific does not have any TNs available in a given exchange to provide to a new customer, it will port a TN from another exchange (within the same rate center) so that it does not have to deny service to the new customer. This is precisely the same technology that Cox is proposing to have trialed in Connecticut. See Final Meeting Minutes, California Statewide Industry Planning Meeting, September 16, 1999, at 9 (statement of Jerome Candelaria, California Cable Television Association).

### Unassigned Number Porting and the FCC

Contrary to statements made on the record at the Department's December 20, 1999 Technical Conference, the FCC supports the trialing of UNP. In two orders dated November 30, 1999, the FCC articulated its support for UNP trials in granting the states of New Hampshire and Wisconsin additional authority to conduct TN conservation measures. In its New Hampshire order, the FCC stated:

We emphasize, however, that our determination not to grant the New Hampshire Commission the authority to order carriers to use UNP does not preclude carriers from voluntarily engaging in UNP where mutually agreeable and where there are no public safety or network reliability concerns. As a matter of fact, we encourage the carriers to do so. Furthermore, we also encourage the New Hampshire Commission and the carriers to work together to identify and promote other innovative measures as well that would encourage the conservation of NXX codes.

See In the Matter of New Hampshire Public Utilities Commission's Petition for Additional Delegated Authority to Implement Number Optimization Measures in the 603 Area Code, CC Docket No. 96-98, NSD File No. L-99-71, FCC Release-Number: DA 99-2634, November 30, 1999 at ¶37 (emphasis added). See also In the Matter of Petition of the Public Service Commission of Wisconsin for Delegation of Additional Authority to Implement Number Conservation Measures, CC Docket No. 96-98, NSD File No. L-99-64, FCC Release-Number: DA 99-2637, November 30, 1999 at ¶27.

Since the Department did not explicitly request from the FCC the authority to implement UNP, it should look to the other Orders referenced above for direction. That direction is clear – the Department can, and with the FCC's support should, conduct of a voluntary trial of UNP. In order to support TN conservation in Connecticut, Cox would volunteer to participate in such a trial.

Moreover, Cox wishes to point out that the caveat in the quotation from the FCC Orders on the UNP issue presented above, relating to public safety or network reliability concerns, is no longer necessary. The public safety concern of the proper handling of 911 calls was universal

as to LNP and now has been solved. In addition, the information upon which the network reliability concern was based is no longer valid because Number Portability Administration Center ("NPAC") Software Release 3.0 and current LNP end office and tandem office switch software solves the alleged technical problems, if in fact they existed, with UNP. These alleged problems include: UNP may interfere with "Snapback," (the returning to the NXX holder of record telephone numbers that are no longer assigned to the porting end user), and UNP will congest switches because a limited number of NPA-NXX codes can be accommodated in the database end office.

It is not necessary to argue the historical correctness of the allegations because the current Release 1.4 subset of Release 2.0 solves the Snapback problem. Release 2.0 is currently in operation across the country whereas the Release 1.4 subset is only in operation in the Mid-West NPAC region. The current end and tandem office switch software have increased tenfold the number of NXXs which can be opened, and there are now over a thousand in LNP capable switches. This solves the alleged "multiple NXX opening" problem.

#### UNP and the Department

It is clear that the Department can conduct a voluntary trial of UNP, although it may not, at this point, have the authority to mandate all carriers' participation. Cox stands ready to assist the Department in this endeavor.

Should the Department desire to be more aggressive, however, the FCC has not indicated in any of its Orders that the Department could not compel SNET/SBC to allow assignment of its unused numbers in a rate center to the customers of another carrier and then port that number to the subscriber's carrier of choice. This second method, referred to as "assign and then port" ("ATP" rather than "UNP") could be mandated by the Department. In implementing this option, the Department could adopt the same process for assigning the number that is now used by resellers who are provided TNs for assignment to their customers.

A diskette containing this letter and the Department's docket filing sheet in Word 6.0 format is enclosed. Please time and date-stamp the extra copy of this letter and return it in the enclosed self-addressed, stamped envelope. Pursuant to Section 16-1-15 of the Department's rules, copies of this filing were served on all parties to this proceeding.

If you have any questions regarding this filing, please contact me.

Sincerely,

Jennifer A. Johns

cc: Active Party Service List  
Brian T. FitzGerald, Esq.

**ATTACHMENT 3**

May 16, 2000

**VIA FEDERAL EXPRESS**

**Ms. Louise Rickard**  
Acting Executive Secretary  
Connecticut Department of  
Public Utility Control  
10 Franklin Square  
New Britain, Connecticut 06051

Re: Docket No. 96-11-10RE03 – DPUC Review of Management of Telephone Numbering Resources in Connecticut – Conservation Measures

Dear Secretary Rickard:

On behalf of Cox Connecticut Telcom, L.L.C. (“Cox”), the enclosed materials provide additional information regarding the feasibility of unassigned telephone number porting (“UNP”) as a number conservation method for the State of Connecticut. This material is intended to supplement Cox’s January 17, 2000 letter to the Department of Public Utility Control (the “Department”) wherein Cox requested that the Department initiate a voluntary UNP trial.

As discussed in Cox’s January 17, 2000 letter, Cox recommends the adoption of UNP between carriers and within a rate center as an efficient telephone number conservation method. The attached materials show that carriers have successfully run UNP trials. In fact, the attached Focal Communications Corporation and MCI WorldCom Joint Report on UNP states that “the trial results . . . clearly indicate that UNP is feasible.”<sup>15</sup> We have also enclosed Cox’s memorandum to the North American Numbering Council concerning the benefits of UNP.

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<sup>15</sup> Focal Communications Corporation and MCI WorldCom Joint Report on UNP at 10.

Ms. Louise Rickard  
May 16, 2000  
Page 2

These materials support Cox's contention that UNP is a feasible number conservation method. Cox, therefore, renews its request for the Department to initiate a voluntary UNP trial.

Thank you for your attention to this matter. Please time and date-stamp a copy of this letter and return it in the enclosed self-addressed, stamped envelope. Pursuant to Section 16-1-15 of the Department's rules, copies of this filing were served on all parties to this proceeding.

If you have any questions regarding this filing, please contact me.

Sincerely,

Brian T. FitzGerald

cc: Service List  
Jennifer A. Johns, Esq.