

Proceeding: WT 01-184

Number portability is THE primary requirement for competitive wireless (as well as wire-line) communications.

Vendor contentions that they cannot provide "number portability" if they are also expected to provide "customer service" - are ludicrous on their face, and clearly reflect a desire for an anti-competitive environment.

["Customer service" refers to all aspects of the vendor's product as advertised and offered to the customer -- coverage area, cost, support, equipment reliability, etc.]

Vendors today are incapable of providing "customer service" which even comes close to fulfilling the expectations a reasonable and prudent individual would have based upon the advertisements constantly being drummed out by the vendors!

Vendor denial of number portability is a thinly veiled attempt to lock-in consumers to their poor customer service... and because the consumer is locked-in, the vendor is under no competitive pressure to extend any effort or treasure to improve that poor customer service.

Number portability is the ONLY recourse a consumer has against a vendor who fails to fulfill their advertised "customer service."

Without "number portability," a consumer is forced to re-print letterhead and business cards, re-work advertisements, personally contact friends, business associates and others who have possibly retained that number in their address books to advise them of the change.

Without "number portability" switching wireless vendors is an extremely EXPENSIVE and time consuming process. That direct out of pocket cost is then added to the aggravation of getting calls intended for the former owner of one's "new number" - usually asking to order drugs or offering sex for pay. And being forced to pay for all those incoming "wrong numbers" in air-time charges simply adds insult to injury.

And in the case of professionals, such as doctors, lawyers or consulting engineers, such "wrong-numbers" can quickly lead to lost prestige and revenues in the least case, and to life threatening situations in the worst case.

The fact that such huge compliance dollar figures are being cited by vendors clearly implies that vendor intent from the beginning was to lock-in customers in an anti-competitive environment of non-portable numbers.