

## **TALKING POINTS LOCAL NUMBER PORTABILITY**

- The wireless industry supports the thousand-block rollout schedule and intends to be ready in all affected NPAs.
- However, the simultaneous implementation of both pooling and porting could jeopardize the ability of carriers to successfully implement pooling. Implementation of pooling alone will pose significant challenges:
  - MIN/MDN separation (separating the mobile identification number from the mobile directory number) will be a major challenge.
  - Wireless carriers will be forced to catch up to wireline (over 150 area codes).
  - Wireline and wireless carriers are concerned about risks to the public switched telephone network.
- The simultaneous mandates will:
  - Pose serious risks to network reliability.
  - Divert valuable resources necessary to continue to address network buildout and quality of service issues.
- There is no cost-benefit analysis that can justify the LNP mandate:
  - Landline local number portability (mandated by Congress, unlike wireless) made sense to spur competition.
  - There is scant evidence, however, that wireline consumers have received benefits to justify \$3 billion spent for local exchange portability.
  - Incremental cost of providing LNP to wireless subscribers will greatly exceed costs of wireline portability (MIN/MDN costs, new inter-carrier communications systems costs, industry's diverse communications channels need to be educated).
  - Already 30% churn.
- At a minimum, the commission should extend the porting deadline for over two years. Extending the deadline will:
  - Reduce risks to network functions.
  - Allow the wireless industry to get through the pooling implementation schedule.
  - Facilitate the wireless industry's ability to successfully address other priorities like E-911, CALEA, TTY, and network buildout.
- **NO MATTER WHAT THE COMMISSION DECIDES, IT SHOULD MAKE A DECISION VERY SOON.**
  - Wireless carriers are having an extremely difficult time making critical resource allocation decisions.
  - Carriers need time to focus on pooling.
  - Carriers need to know if they also have to focus on porting.