

particular phone used to place the emergency call. Callback clearly is a vital feature of wireless 9-1-1 service and should be preserved without interruption wherever possible.

The interruption is minimized by compressing the time when there are two phone services on separate networks, both with the same phone number. Only one service can be called back, even though both have 9-1-1 access capability. Which service contains the callback capability -- wireless or wireline -- will depend on the direction and stage of the transfer.²

10-Digit Trigger. During one part of the process, a 10-digit trigger can be implemented by the donor (losing) service provider on the switch that has been utilized to provide service. The implementation of this trigger will ensure that after number transfer activation, all incoming calls (including 9-1-1 callback from a PSAP) will go to the phone provided by the new (gaining) service provider.

If the trigger is not implanted, then calls from phones on the same switch that also had been providing service to the customer before the port will continue to go to the former service's phone until the disconnect process is completed (days after the port for many wireless service providers). In an informal, non-documented poll NENA conducted among wireline service provider representatives, it appears that most major wireline service providers in most states are implementing the 10-digit trigger already for simple ports (such as a single-number residential wireline-to-wireline port).

NENA recommends that the FCC take steps to ensure that the wireline industry also utilize the 10-digit trigger, where technically feasible and needed, for wireline to wireless porting. While the 10-digit trigger helps ensure that the customer's new phone can be called back after port activation, it does nothing to solve the 9-1-1 difficulty that at least one of the two

² See, generally, Report of the Wireless Number Portability Subcommittee to the North American Numbering Council, September 29, 2000, accessible at <http://www.npac.com/cmas/documents.htm#WNP>.

active phones cannot be called back between activation of new service and disconnect of old service.

Timing of service activation

In a wireline-to-wireless porting process, there are specific steps related to when a new customer may have service activation. These include (1) time of sale, (2) time of notification -- Firm Order Confirmation (“FOC”) -- from the donor service provider that the original local service request (“LSR”) has been received, and (3) time of port activation by the Number Portability Administration Center (“NPAC”). At the time of service activation, the customer has 9-1-1 access, with delivery of call back number to the PSAP. Prior to that time, the customer may have access, but with the phone treated as non-service-initialized (“NSI”) and not capable of delivering a callback number or being called back.

If the wireless service is activated at the time of sale, there are additional problems besides the mixed service callback issue described above. This may include erroneous information related to the port, depending on the care taken by sales clerks. Errors at point of sale may either hinder completion or cause data to be changed and/or new service not to be possible with the designated phone number.

If the wireless service is activated after receipt of the FOC from the donor service provider, in a wireline-to-wireless porting process there still may be at least two business days before the port activation is completed. During this time, the PSAP will be unable to call back the wireless phone.

However, if the wireless service is activated near the time of NPAC port activation, the 9-1-1 callback capability should be available within the few minutes or hours after service activation. Accordingly, NENA recommends that the FCC consider instructing wireless carriers

that service activation should be within a few hours prior to port activation, regardless of whether it is a wireline-to-wireless or wireless-to-wireless port.

Uniform process

CTIA suggests (Petition, 10) that to shorten the porting interval, “the wireline industry must agree to automation and uniformity across all service providers.” Several aspects of 9-1-1 service could benefit from such an agreement. Increased automation and uniformity should help 9-1-1 data updates in general, so they could be quicker and more accurate. This could also help minimize errors, such as accidental porting.

To minimize negative 9-1-1 effects when a wireline-to-wireless port is involved, the wireline disconnect process should be shortened. Such a change would reduce the time that a wireline phone on the losing service could be used to place a 9-1-1 call but have no callback possibility -- even though the customer’s switch to wireless service has been completed by port activation.

NENA WNP subcommittee consensus

The NENA WNP subcommittee is part of technical committee structure described at <http://www.nena9-1-1.org/9-1-1TechStandards/index.htm>. It includes membership from most national and some regional wireless carriers, 9-1-1 service providers (usually LECs), vendors and other entities and organizations involved or having an interest in number portability, particularly as it relates to wireless service.

At a recent meeting, consensus was reached in support of two recommendations. These are: (1) education of customers as to 9-1-1 service during the porting interval, when a wireline-to-wireless port is involved, and (2) the 10-digit trigger activation. This latter topic is covered in

more detail elsewhere in this document. The technical subcommittee could not reach consensus regarding any timing changes to the wireless and wireline porting and disconnect processes.

Roaming

CTIA states that “the Commission needs to clarify when the requirement to support nationwide roaming goes into effect for rural and small carriers.” (Petition, 31) NENA supports that suggestion.

The 9-1-1 issue relating to lack of MIN/MDN separation compliance by wireless carriers was addressed by NENA 18 months ago.³ NENA stated that if a wireless carrier did not have software in place to support use of its network by customers with distinctive mobile identification numbers (MINs) and mobile directory numbers (MDNs), it would not be capable of delivering the correct callback number to a PSAP. Instead, it would likely deliver the MIN, which could not be used to call back the 9-1-1 caller. Possibly, if the PSAP callback attempt were made, it could reach another phone, wireless or wireline, elsewhere in the country. It still appears there are some wireless carriers that have not yet completed MIN/MDN separation, either on their entire network or at some switches.

If a wireless carrier has not complied with MIN/MDN separation, it is unable to support roaming. Meaning that the wireless carrier is also technically incapable of delivering the correct callback number to a PSAP when a roamer, with separate MIN and MDN, places a 9-1-1 call.

Realizing that there are financial implications for rural and regional wireless service providers to be fully MIN/MDN-compliant, NENA would ask that the FCC repeat its warning that delivery of the correct callback number to the PSAP is still required unless the requirement has been expressly waived.

³ Letter from James R. Hobson to FCC Secretary, January 30, 2002, at 4, Dockets 95-116, 94-102, et al.

Type 1 interconnection⁴

The CTIA Petition also discusses Type 1 interconnection issues, including the porting interval times. In a wireless-to-wireless port, if the donor service provider utilizes Type 1 interconnection from a wireline carrier, the port process is very similar to a wireline-to-wireless, as far as 9-1-1 mixed-service callback obstacles. To minimize negative 9-1-1 impacts, as discussed earlier, NENA recommends the FCC consider instructing the wireless carriers that service activation should be near in time to port activation.

CONCLUSION

With respect to those 9-1-1 issues discussed above, NENA supports CTIA's request that - clarification be given or action taken in time to support effective LNP implementation in November 2003.

Respectfully submitted,

NENA

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ITS ATTORNEY

Certificate of Service

A copy of the foregoing "Comments of NENA" was served by e-mail attachment upon Michael F. Altschul, CTIA General Counsel, on this date.

James R. Hobson

⁴ CTIA (Petition, 26) quotes the FCC's definition of Type 1 interconnection: "Under Type 1 interconnection, the LEC owns the switch serving the CMRS network. Therefore, it performs the origination and termination of both incoming and outgoing calls." (citations omitted)