

CO/NXX WORKSHOP

TITLE: Prohibition on the Porting of Grandfathered NXX
Numbers

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ABSTRACT:

This contribution proposes a new Assumption be added to the COCAG to prohibit the porting of numbers that originate from wireless Grandfathered NXX codes.

NOTICE:

This contribution has been prepared by Verizon to assist the INC. This document is offered to the INC as a basis for discussion and is not a binding proposal on Verizon. Verizon specifically reserves the right to amend or withdraw the statements contained herein.

Rationale

Verizon recommends that there should be a prohibition placed on the porting of wireless grandfathered codes in a similar manner to what has been agreed regarding the assignment of blocks from such numbers. Some of the reasons for this proposed prohibition are:

- If customers were permitted to port their wireless grandfathered numbers to the surrounding wireline network, they would be required to dial 10 or 1+10 digits on all outgoing calls. This would be inequitable and confusing to the subscriber. In addition, all calls initiated to these numbers would also need to be dialed on a 10 or 1+10 digit basis even though they may be local. Neighbors whose numbers are in the native NPA would not be subject to these same requirements.
- The wireline company that “ported in” the wireless grandfathered numbers(s) would be faced with accommodating a mini-overlay situation. For such a port to work, the wireline carrier would have to do the same kind of network preparation as would be required for an area code overlay, work which typically takes at least a year. In some cases, 911 networks would have to be upgraded to recognize ten-digit ANIs. Implementing the mini-overlay could trigger the mandatory ten-digit dialing requirement of section 52.19(c)(3)(ii) of the FCC’s rules.
- This would also require the establishment of additional trunking to support E911 and operator services for the ported wireless grandfathered numbers. Entries for these non-native area code numbers would need to be added to all the switches in a given rate center and the non-native area code would need to be installed in all of the switches in the NPA. This would be costly and inefficient.
- Even if wireless subscribers were permitted to port their wireless grandfathered numbers between wireless Service Providers (SPs), it would be confusing for customers and may delay the hoped for sunset of the wireless grandfathered codes. Since these numbers are to be retired, allowing wireless-to-wireless porting would confuse and irritate subscribers because they would need to surrender these numbers in the not too distant future. These customers would receive a mixed message and be greatly inconvenienced by allowing them to keep the numbers in one instance only to have them change their number shortly thereafter.

Based on these reasons the following is proposed.

Proposal

Add the following Assumption 2.15 to the Central Office Code Assignment Guidelines

2.0 Assumptions and Constraints

- 2.15 For the purposes of these guidelines, it is assumed that numbers in an activated NXX code originating from wireless grandfathered NXXs¹ cannot be ported between SPs until regulatory authorities direct how to handle these unique numbering resources.

¹ “Grandfathered” wireless NXXs exist in states where the regulatory agency has allowed wireless carriers to maintain their existing (old) NPA-NXXs in geographic areas (and rate centers) that were assigned a new NPA. Equivalent circumstances occur in some states where the term “grandfathered” is not used, e.g., CO codes not in a correct geographic NPA.