

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Telephone Number Portability ) CC Docket No. 95-116  
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**COMMENTS OF CTIA – THE WIRELESS ASSOCIATION™**

CTIA – The Wireless Association™ (“CTIA”)<sup>1</sup> hereby submits its Comments in response to the Second Further Notice of Proposed Rulemaking (“FNPRM”) in CC Docket No. 95-116.<sup>2</sup> In this second FNPRM, the Commission seeks comment on the recommendation of the North American Numbering Council (NANC) for intermodal porting (*i.e.*, porting between wireline and wireless carriers).<sup>3</sup> The Commission also seeks comment on implementation issues in the event that a reduced intermodal porting interval is adopted.

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<sup>1</sup> CTIA – The Wireless Association™ (formally known as the Cellular Telecommunications & Internet Association) is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service (“CMRS”) providers and manufacturers, including cellular, broadband PCS, ESMR, as well as providers and manufacturers of wireless data services and products.

<sup>2</sup> See Second Further Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 04-217 (rel. Oct. 18, 2004).

<sup>3</sup> Porting, also referred to as number portability or local number portability (LNP), allows consumers to retain their existing phone numbers when switching carriers. *See* 47 U.S.C. § 153(30); 47 C.F.R. § 52.21(1); *Telephone Number Portability*, CC Docket No. 95-116, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8352, 8368 (1996).

CTIA supports the efforts of the NANC and the Commission to shorten the intermodal porting process. As the Commission has noted, reducing the wireline porting interval for intermodal ports benefits consumers by making it quicker for consumers to port their numbers. While wireless carriers have established a two and one-half hour interval as their goal to complete wireless-to-wireless ports,<sup>4</sup> wireline carriers have adopted an interval of at least four business days for implementing wireline-to-wireline ports. CTIA supports reducing the current wireline porting interval for intermodal porting. As an added consumer benefit, a shorter intermodal port interval will help reduce the level of customer port cancellations and reduce the period of “mixed service” that may affect 911 service.

However, the NANC recommendation should be the starting point of the Commission’s actions to facilitate intermodal porting and competition. Additional efforts are required to further shorten the porting interval to even less than the 53 hours recommended by the NANC, and even more important, the Commission should require the wireline industry to simplify the intercarrier porting process by creating a uniform local service request (“LSR” or “LSOG”) that streamlines the porting process by decreasing the number of data fields carriers need to populate and validate.<sup>5</sup> CTIA asks the Commission to require the wireline carriers to implement a uniform, simplified LSR validation process within twelve months. Given the industry’s experience

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<sup>4</sup> See First Report on Wireless Wireline Integration; North American Numbering Council Wireless Number Portability Subcommittee Report on Wireless Number Portability Technical, Operational, and Implementation Requirements Phase II, CC Docket No. 95-116 (filed Sept. 26, 2000); and ATIS Operations and Billing Forum, Wireless Intercarrier Communications: Interface Specification for Local Number Portability, Version 2, at § 2 p. 6 (Jan. 2003).

<sup>5</sup> The wireless industry has reduced the required fields to only three: (1) ported telephone number; (2) account telephone number; and (3) five-digit zip code.

processing port requests, and because every carrier already has a LSR, one year should be more than sufficient to develop a uniform, streamlined LSR format.

In its earlier FNPRM in this docket, the Commission asked the North American Numbering Council (“NANC”) to provide its recommendation on reducing the interval for intermodal porting. The NANC accepted this request and formed an “Issues Management Group” (“IMG”) to develop a recommendation along with corresponding updates to the NANC LNP process flows and any recommendations on an appropriate transition period. CTIA, along with subject-matter experts from all segments of the telecommunications industry, participated in the IMG.

On May 3, 2004, following an estimated 2,000 hours of work, the NANC submitted its recommendation for reducing the intermodal porting interval.<sup>6</sup> To reduce the four-day porting interval, the NANC considered reductions to the Confirmation Interval and the Activation Interval. Specifically, it developed two Confirmation Interval proposals (Proposals C1 and C2) and three Activation Interval proposals (Proposals A1, A2, and A3).<sup>7</sup> Each of the two Confirmation Interval proposals were considered with each of the three Activation Interval proposals, for a total of six proposals for reducing the intermodal porting interval. Below is a

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<sup>6</sup> See Letter from Robert C. Atkinson, Chairman, NANC, to William Maher, Chief, Wireline Competition Bureau, Federal Communications Commission, CC Docket No. 95-116 (dated May 3, 2004) (Porting Interval Letter); *NANC Report and Recommendation on Intermodal Porting Intervals*, Prepared for the NANC by the Intermodal Porting Interval Issue Management Group at 4 (dated May 3, 2004) (NANC Report). The NANC Report can be located at [http://www.nanc-chair.org/docs/nowg/May04\\_Intermodal\\_Porting\\_Report.doc](http://www.nanc-chair.org/docs/nowg/May04_Intermodal_Porting_Report.doc)

<sup>7</sup> . *Id.* at 15-21.

summary of the NANC's proposals:<sup>8</sup>

- **Proposal C1** – Establishes a port request and port response time within one hour by requiring all carriers to use the same validation criteria (*e.g.* porting telephone number, social security number or account number or tax identification number, zip code, and pin or pass code if applicable).
- **Proposal C2** – Establishes a reduced port response time not to exceed five hours from the receipt of an error-free order by establishing a mechanized interface.
- **Proposal A1** – Establishes a two-day Activation Interval with new NPAC timers.
- **Proposal A2** – Establishes a two-day Activation Interval with shortened existing timers.
- **Proposal A3** – Establishes a two-day Activation Interval by requiring the old service provider to send the necessary information to the NPAC no later than 24 hours prior to the NPAC due date (Early Morning Activation).

After reviewing the proposals, the NANC found that the costs of Proposal C1 outweighed the potential benefits. Specifically, the NANC found that Proposal C1 reduced the Confirmation Interval by four more hours than Proposal C2, but at a much higher cost.<sup>9</sup> With respect to the Activation Interval, the NANC determined that Proposal A3 provides a substantial reduction in the intermodal porting interval at a much lower cost to the industry and consumers than the other Activation Interval proposals.

CTIA supports the NANC's conclusion that the C2/A3 combination provides a shorter porting

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<sup>8</sup> *Id.* at 15-20.

<sup>9</sup> *Id.* at 29. The NANC estimates that Proposal C1 could cost the industry and consumers in excess of \$600 million to \$1 billion. Proposal C1 could reduce the porting interval by 23 hours. Proposal C2 could reduce the porting interval by 19 hours. The NANC estimates that Proposal C2 would cost less than \$50 million to implement. *Id.* at 21.

interval and the most economical approach to a reduced intermodal porting interval.<sup>10</sup> If this approach is adopted, orders received in a mechanized manner should be responded to in five hours or less (Proposal C2) and the ten-digit triggers should be set 24 hours before 12:01 a.m. of the confirmed due date (Proposal A3).<sup>11</sup> As the NANC concluded, this combination provides the shortest “maximum porting interval” (53 hours) and the greatest total time saved (43 hours).<sup>12</sup> Moreover, the estimated cost to cost to implement the NANC’s C2/A3 recommendation is less than \$50 million.<sup>13</sup>

The Commission has made clear that the benefits to consumers outweigh the costs carriers incur implementing number portability.<sup>14</sup> When it imposed number portability on wireless carriers, the Commission dismissed Cingular’s estimate that it would have on-going costs of \$50 million a year by noting that these costs, when spread over a Cingular’s base of 30 million subscribers, would result in no more than a 10 to 20 cent per month per-subscriber assessment.<sup>15</sup> Given the NANC’s estimate that the C2/A3 recommendation can be implemented for a one time cost of less than \$50 million, and will be spread over a base of customers many times greater than Cingular’s, the benefits flowing from this improvement to the intermodal porting process clearly outweigh the costs.

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<sup>10</sup> *Id.* at 4, 29. The NANC found that Proposal A2 did not allow enough time to consider the handling of complex orders and was eliminated by the NANC as a possible solution.

<sup>11</sup> *Id.* at 4, 30. The setting of the ten-digit trigger causes the switch to query the appropriate LNP network database for calls to the applicable telephone number, and eliminate some of the close coordination needed between the old service provider and the new service provider during the completion of the porting process. *Id.* at 7.

<sup>12</sup> *Id.* at 4, 30.

<sup>13</sup> *Id.* at 21.

<sup>14</sup> See Memorandum Opinion and Order, WT Docket No. 01-184, FCC 02-215 (rel. July 26, 2002).

<sup>15</sup> *Id.* at ¶ 29.

Finally, as noted above, adopting the NANC recommendation should be the starting point of the Commission's actions to facilitate intermodal porting and competition. The Commission should support additional efforts to further shorten the porting interval. Even more important, the Commission should require the wireline industry to simplify the intercarrier porting process by creating a uniform local service request ("LSR" or "LSOG") that streamlines the porting process by decreasing the number of data fields carriers need to populate and validate. Under the current system, each carrier's LSR is different, and includes fields that are not required for number porting. Moreover, wireline carriers routinely reject LSRs that do not include information in every field, which prevents carriers from even starting the clock on the intercarrier porting process. So days and weeks can pass before a port request even gets to the porting process. To address this problem, the Commission should require all carriers to implement a uniform, simplified LSR validation process within twelve months. Given the industry's experience processing port requests, and because every carrier already has a LSR, one year should be more than sufficient to develop a uniform, streamlined LSR format.

