

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

In the Matter of

Telephone Number Portability

CC Docket No. 95-116

**VERIZON WIRELESS' REPLY COMMENTS ON SECOND FURTHER NOTICE OF
PROPOSED RULEMAKING CONCERNING THE INTERMODAL PORTING
INTERVAL**

Verizon Wireless commends the Federal Communications Commission for examining ways to improve the efficiency and effectiveness of intermodal porting for customers. As the FCC has found repeatedly, intermodal porting is a valuable tool for bolstering competition in telecommunications services. Customers are benefiting from the increased ability to “cut the cord,” but could benefit further with improvements in the porting process.

Verizon Wireless believes that the focus for improvement should be on simplifying the pre-port process that occurs before the four-business day clock starts. When customers decide to change carriers, they want the transaction completed as soon as possible, so they can have full access to their telecommunications services (i.e., incoming and outgoing calls, 911). While the “four business day” standard is appropriate to ensure basic compliance, the industry can do more to improve the customer experience by first focusing on streamlining the pre-port ordering process.

The 4 business-day interval for simple ports often does not accurately reflect the customer experience because it does not begin to toll until after a LEC receives an error-free Local Service Request (“LSR”). As Syniverse notes in its comments, problems in this “pre-

porting” phase can result in multiple rejections of requests before the 4 business-day clock even starts to tick.¹ The problems relate primarily to: (1) lack of uniformity between LEC LSR forms (and particularly the LSR guidelines (“LSOG”) employed by each carrier), which complicates Verizon Wireless’ job of training its front-line sales force to collect the necessary information from a customer seeking to port his wireline number; and (2) requirements that all services linked to a number be disconnected before the porting process can begin (this often requires multiple calls to and from the customer, the LEC and the wireless provider).

As Verizon notes in its initial comments², intermodal flow-through rates under the current standard should be improved and industry groups have before them a number of proposals that could improve the intermodal porting process. One of those proposals involves streamlining validation of Local Service Requests to port a number to a wireless carrier. By simplifying the ordering and validation procedures, the industry can reduce port completion times and improve the customer experience.

“Pre-porting” delays raise special challenges for competitive wireless carriers who handle port requests from customers in-person and usually in a store setting. New wireless customers expect to leave stores with a working phone that they can use and test immediately. The result is a period of “mixed service” where a customer can make calls immediately but will continue to receive calls to the number on his landline phone until pre-porting issues are resolved and the port is complete. As the port completion time builds, wireless carriers receive multiple calls from frustrated customers and have little ability to set a reliable port completion expectation.

¹ See Comments of Syniverse Technologies, Inc. at 3.

² See Verizon comments at 5.

Consequently, Verizon Wireless believes that industry resources should be targeted to improving the “pre-port” process.

One important step in reducing the pre-port and confirmation interval periods is for LECs to examine their current validation criteria, eliminate criteria that are not measurably supporting validation and agree to works towards a common, wireline industry-wide set of revised criteria. Syniverse proposes in its comments that the validation elements be limited to three “data” elements, including ported telephone number, account telephone number and zip code. While other data elements may be appropriate at well, based upon LEC input, Verizon Wireless agrees that limiting validation criteria to numeric values can vastly improve validation efficiency. Verizon Wireless experienced first hand the benefits of dropping names and street abbreviations from validation elements, just by the prevention of misspellings and inaccurate abbreviations (Lane vs. LN, etc.).

The wireless industry undertook an iterative process after the initial launch of LNP in November 2003 to evaluate the effect of different validation criteria on port fall-out and correct validation. The major carriers agreed to eliminate criteria that were not numeric (i.e., customer names and street names) and to rely instead on the following validation elements: telephone number; social security number OR account number; and PIN (if applicable). The results were dramatic, with fall-out rates falling from over 50% to 10-20%. By avoiding fall-out and customer care intervention, port completion times nose-dived. Carriers paid careful attention to the possible effect on inadvertent ports, and found that many of the validation elements were indeed extraneous and therefore their elimination did not compromise validation. As a safeguard, however, the industry developed processes to facilitate port reversals (“snap-backs”) for the rare occasions where a port is inadvertently ported. While each change in validation

elements required participating wireless carriers to implement changes to IT systems and switches, the benefits for Verizon Wireless far out-weighed the costs. Ports are completing more quickly, customers are happier and wireless carriers are spending fewer resources in manually intervening in rejected ports.

The porting process could also be improved by reducing the number of different Local Service Ordering Guideline (LSOG) versions that wireline carriers require wireless carriers to use for purposes of submitting a port request. Currently there are multiple LSOG versions. Verizon Wireless has processed port requests involving 249 different wireline carriers — and for each carrier its port center needs to ensure that it is using the proper LSOG version (which will become even more difficult as new LSOG versions are released). Ideally, LECs should work together to develop a common form for use by wireless carriers that are solely “ordering” a port from a LEC. But at a minimum, the number of active LSOG versions should be reduced.

Looking at the porting process from the viewpoint of the customer, who cares only that her port is completed accurately and quickly, the FCC should review other obstacles, beyond the prescribed porting interval that are causing porting delays. Specifically, some ports are delayed because the old service provider fails to update the NPAC database with its portable NPA/ NXX codes until it has received an initial port request for a number out of that code. Other carriers are failing to update their own switches with LERG updates on a frequent basis, which interrupts both port requests and call routing to other ported numbers.

There is also room for improvement in the interval for completion of wireless-to-wireless ports involving “type 1” numbers that are resident in LEC switches, primarily in some of the mid-size and smaller LEC switches. Some LECs are refusing to facilitate wireless-to-wireless ports that involve type 1 numbers resident in their switches (sometimes relying on State porting

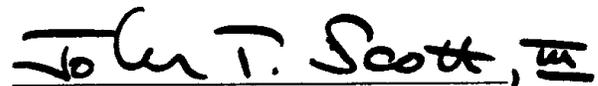
waivers and other times on assertions that the wireless carriers should convert their numbers to “type 2” numbers). By clarifying the obligations of different carriers, the FCC could significantly improve the porting intervals for “type 1” wireless-to-wireless ports.

Conclusion

As the FCC predicted, LNP opened the door for increased competition and consumer choice in telecommunications. The wireless-to-wireless porting process, which is automated, quick and customer friendly, is facilitating far more ports than the inter-modal porting process. Customers stand to benefit greatly if the industry will take the lessons learned from the wireless-to-wireless porting roll-out and apply them, where possible and cost-effective to the intermodal situation.

Respectfully submitted,

VERIZON WIRELESS

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive style with a horizontal line underneath the name.

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