

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

In the Matter of

Telephone Number Portability

CC Docket No. 95-116

**REPLY COMMENTS OF BELLSOUTH CORPORATION**

BellSouth Corporation, on behalf of itself and its wholly owned subsidiaries (collectively “BellSouth”), respectfully submits these replies in response to the *Second Further Notice of Proposed Rulemaking* (“*Second FNPRM*”) in the above-captioned proceeding.<sup>1</sup>

**I. INTRODUCTION AND SUMMARY**

As demonstrated more fully below, there is record evidence that reducing the intermodal porting interval is premature. The low volume of intermodal porting as well as the costs and burdens associated with implementing system changes to accommodate a shortened porting interval all weigh against reducing the intermodal porting interval at this time. Notwithstanding the lack of evidence to justify such a modification, if the Commission proceeds with changing the intermodal porting interval, BellSouth supports the recommendation of the North American Numbering Council (“NANC”) to shorten the interval to 53 hours for simple, mechanized error-

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<sup>1</sup> *Telephone Number Portability*, CC Docket No. 95-116, *Second Further Notice of Proposed Rulemaking*, FCC 04-217 (rel. Sept. 16, 2004) (“*Second FNPRM*”).

free ports.<sup>2</sup> BellSouth, however, objects to the wireless industry's proposals asking the Commission to reduce the porting interval beyond that recommended by the NANC and to mandate the industry-wide use of a uniform version of the Local Service Ordering Guidelines ("LSOG") or a streamlined Local Service Request ("LSR"). Requiring the use of a common LSOG version or particular fields on an LSR would constitute unnecessary and unjustified agency micromanagement of the porting process.

## **II. PARTIES AGREE THAT THERE IS NO DEMONSTRATED NEED TO REDUCE THE INTERMODAL PORTING INTERVAL AT THIS TIME.**

A significant number of parties including BellSouth agree that there is no need to reduce the intermodal porting interval at this time.<sup>3</sup> As the Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO") points out "there is no evidence that reducing the intermodal porting interval will benefit consumers or that the current four-day porting interval is somehow hindering intermodal portability."<sup>4</sup> Moreover, BellSouth agrees with TDS that "[s]hortening the intermodal porting interval would create a regulatory burden without providing a corresponding benefit to the public."<sup>5</sup> Given the nascency of intermodal porting, the absence of high consumer demand for such porting, and the additional costs and burdens associated with modifying carrier networks and operations support systems to

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<sup>2</sup> See NANC Report & Recommendation on Intermodal Porting Intervals (April 2004) ("NANC Report") at 4. The 53-hour interval was arrived at by considering changes to two stages of the process flow for intermodal porting.

<sup>3</sup> See, e.g., BellSouth Comments at 1-2; Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO") Comments at 2; Qwest Communications International Inc. ("Qwest") Comments at 1; SBC Communications Inc. ("SBC") Comments at 1-2; TCA, Inc. ("TCA") Comments at 1; TDS Telecommunications Corp. ("TDS") Comments at 1-2; United States Telecom Association ("USTA") Comments at 2, 4-5; Verizon Comments at 2.

<sup>4</sup> OPASTCO Comments at 2.

<sup>5</sup> TDS Comments at 1.

accommodate a reduced porting interval, the Commission should retain the existing interval for intermodal ports.

**III. IF THE COMMISSION NEVERTHELESS DECIDES TO REDUCE THE INTERMODAL PORTING INTERVAL, IT SHOULD ADOPT THE NANC RECOMMENDATION WITHOUT ANY ADDITIONAL MODIFICATIONS.**

Although the record demonstrates that there is no need to shorten the intermodal porting interval at this time, if the Commission nevertheless decides to modify the porting timeframe, BellSouth and others support adoption of the NANC recommendation without any additional modifications.<sup>6</sup> Any proposals to reduce the porting interval or streamline the process beyond that recommended by the NANC<sup>7</sup> should be rejected. The NANC recommendation was an industry-wide effort and represents a consensus among both wireless and wireline providers. The Commission should not dismiss this industry agreed-upon recommendation in favor of proposals that were rejected, not included as part of the final NANC recommendation, or are being addressed in more appropriate forums, as discussed more fully below.

BellSouth opposes the use of a common LSOG version or streamlined LSR in order to process intermodal ports as suggested by some wireless providers.<sup>8</sup> As an initial matter, contrary to the assertions of Nextel and Sprint,<sup>9</sup> the NANC did not recommend that the industry use a

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<sup>6</sup> See, e.g., BellSouth Comments at 5-6; Qwest Comments at 2-4; SBC Comments at 3-4.

<sup>7</sup> See, e.g., CTIA Comments at 2; Nextel Communications (“Nextel”) Comments at 6; Sprint Comments at 3; T-Mobile USA, Inc. (“T-Mobile”) at 3-8.

<sup>8</sup> It appears as if some commenters use the terms “common LSOG version” and “LSR” interchangeably. The Local Service Ordering Guidelines (“LSOG”) are a set of standard business guidelines designed to facilitate the ordering and provisioning of local service between carriers. These guidelines are developed by the Alliance for Telecommunications Industry Solutions (“ATIS”), and updated versions are released on a routine basis, sometimes as frequently as twice a year. Contained within LSOG are a number of different forms, including the LSR, which carriers use in the ordering and provisioning process.

<sup>9</sup> See Nextel Comments at 3; Sprint Comments at 10.

common LSOG version. Rather the NANC merely pointed out that the industry could consider the use of a common LSOG version to achieve certain efficiencies. Specifically, the NANC stated:

The industry may consider establishing one common LSOG version (a uniform format and exchange of information) and a single mechanized interface that could yield efficiencies by reducing the implementation time and effort required to deploy a mechanized interface when compared to automating the various intercarrier communication process, formats and forms in use by trading partners today.<sup>10</sup>

This statement, however, should not and cannot be construed as a recommendation by the NANC.<sup>11</sup> Simply put, the use of a common LSOG version was never part of the NANC recommendation for reducing the intermodal porting interval and is not supported by BellSouth.

Moreover, there are a number of reasons why the Commission should decline to require the use of a common LSOG version or streamlined LSR across the industry for intermodal ports. First, the LSOG and the LSR process are not exclusively reserved for local number portability. For example, if a carrier wants to order a resold line, it submits an LSR. If a CLEC wants to disconnect a local exchange service, it submits an LSR. If a wireline or wireless carrier wants to port a number from BellSouth to another carrier, it submits an LSR. The Commission cannot and should not allow one aspect of the local service ordering process – local number portability – to drive the entire process.

Second, the use of a common LSOG version will not eliminate the need for individual carriers to customize the basic guidelines to meet their unique needs and the needs of their carrier and end-user customers. Thus, even carriers that use the same LSOG release today have created

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<sup>10</sup> NANC Report at 28 (emphasis added).

<sup>11</sup> See, e.g., BellSouth Comments at 12; SBC Comments at 5; Qwest Comments at 3.

hybrid forms and processes to accommodate their individual circumstances. As the NANC Report explains, “[c]urrently, each LEC may choose a different LSOG version based on their business needs to process consumer updates including porting.”<sup>12</sup> A carrier must retain the flexibility to use the LSOG version that best suits its business needs and the needs of the carrier with which it exchanges information. It is illogical and would be extremely burdensome to require carriers with different systems and different resources to adopt a uniform method for exchanging information solely to accommodate intermodal porting.

Further, as BellSouth indicated in its comments, it is far more important for a carrier to know the business rules of the other carrier involved in a porting transaction than it is to use a common LSOG version.<sup>13</sup> A company’s business rules describe in detail the processes and procedures required to exchange information between carriers in order to facilitate the processing of all types of service orders, including LNP requests. Thus, familiarity and adherence to a company’s business rules and industry guidelines will yield greater efficiencies and benefits than the use of a common LSOG version.

Third, it would be extremely burdensome and costly to require all providers to modify their systems to accommodate every release of a new LSOG version or a standardized LSR. Every time a carrier adopts the use of a new LSOG version or LSR, it must modify its OSS to accommodate new fields and formats. These changes must be tested both internally and externally to ensure that competing providers can access carrier systems. Requiring all providers to support the same LSOG version or LSR not only imposes costs and burdens that far outweigh the perceived benefits but also severely constrains a carrier’s business operations.

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<sup>12</sup> NANC Report at 28.

<sup>13</sup> BellSouth Comments at 12.

Fourth, the possible reduction of the validation fields on an LSR used for intermodal porting is currently under consideration by the industry. The Interspecies Task Force, a subcommittee comprised of wireless and wireline providers within ATIS's Ordering and Billing Forum, is currently reviewing this issue. Issues such as this one, which affect the ordering and provisioning of local service and involve standards and guidelines for the exchange of information between providers, are typically and appropriately resolved by the industry, and the Commission should not interfere with this established process. Indeed, BellSouth is unaware of any context in which the Commission has mandated the use of a particular form to facilitate transactions between carriers. Mandating the use of a common LSOG version or particular fields on an LSR would constitute unnecessary and unjustified micromanagement of the porting process by the Commission and should be avoided.

Fifth, limiting the number of validation fields on an LSR solely to accommodate intermodal porting is unnecessary. Several wireless carriers claim that intermodal porting has been hindered because wireline carriers use "too many validation fields" or fields that are not standardized.<sup>14</sup> They request that the Commission limit the number of validation fields to those used by wireless providers for wireless intramodal porting: (1) ported telephone number; (2) account telephone number; and (3) zip code.<sup>15</sup> The wireless carriers also assert that they do not

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<sup>14</sup> Sprint Comments at 7; *see also* Syniverse Technologies, Inc. ("Syniverse") Comments at 4-5; T-Mobile Comments at 4, 7-8.

<sup>15</sup> *See, e.g.*, Syniverse Comments at 2; Sprint Comments at 9 (proposes the following fields: (1) telephone number; (2) state; and (3) zip code); T-Mobile Comments at 8 (proposes the following fields: (1) ten-digit telephone number; (2) subscriber's social security number or account number; and (3) if applicable, a Personal Identification Number or password).

have access to the data required in order to populate the LSRs of wireline carriers or to validate data.<sup>16</sup>

A number of the problems experienced by wireless providers in completing LSRs stem, in large part, from their failure to follow established carrier porting processes and guidelines, not from the number of validation fields. For example, BellSouth has provided wireless carriers several ways to validate or obtain customer data necessary to process port requests. However, a number of these carriers and their third-party vendors do not follow the established processes or carrier business rules, thereby leading to porting delays and erroneous or incomplete LSRs.

Syniverse – a third-party vendor for wireless carriers – states that data fields validated by wireline carriers for intermodal ports can include account telephone number, existing account telephone number, ported number, end user name, end user address fields, migration indicator, and type of service.<sup>17</sup> All of this very pertinent information is readily available to wireless carriers through a combination of reviewing the customer account information and following BellSouth's business rules.

BellSouth, like many other carriers, offers a pre-ordering/pre-port process that allows wireless and wireline providers to access accurate customer record information, including listing name, billing address, street address, type of service, etc. If providers use this pre-ordering/pre-port process, confusion over the appropriate name or whether to use Street, St., Ave., Avenue to validate an address can be avoided. In fact, BellSouth data shows that, as more wireless providers and third-party vendors have utilized the established processes designed to facilitate successful porting, the number of ports in error and inadvertent ports has declined. This

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<sup>16</sup> See, e.g., Sprint Comments at 7-8; Syniverse Comments at 4-5; T-Mobile Comments at 4, 7-8.

<sup>17</sup> Syniverse Comments at 3-4.

reduction can be attributed in part to increased use of the pre-ordering/pre-port process and familiarity with BellSouth's business rules.

As the foregoing demonstrates, the Commission should not mandate the use of a uniform LSOG version or streamlined LSR for intermodal porting. The economic burdens of adopting a one-size-fits-all approach, the availability of guidelines and business rules to enable wireless carriers to accurately complete LSRs, and the current industry efforts to address the concerns of the wireless carriers all weigh strongly against the Commission requiring each and every provider to use the same LSOG version or dictating the format and fields included on an LSR.

Respectfully submitted,

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Its Attorney

By:



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December 17, 2004

**CERTIFICATE OF SERVICE**

I do hereby certify that I have this 17<sup>th</sup> day of December 2004 served the following parties to this action with a copy of the foregoing **REPLY COMMENTS** by electronic filing and/or by placing a copy of the same in the United States Mail, addressed to the parties listed on the attached service list.

  
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