

Maximizing Consumer Choice and Fostering Competition

Simple and Efficient Porting Rules and Process

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THE PROBLEM

- **Consumer Inconvenience:** Consumers currently experience unnecessary delays and other inconveniences when they try to retain their telephone number while changing service providers. Many consumers simply give up rather than suffer the delays and inconveniences.
- **Burdensome and Costly Port Process:** The inefficiencies of non-standard porting processes result in costly and untimely customized porting procedures.
- **Unnecessary Disputes and Denials:** The lack of clear and simple rules yields unnecessary disputes between service providers and/or denial of the consumer's port request.
- **Regulatory Uncertainty:** The current rules are vague and incomplete, resulting in confusion over what is (or is not) location portability and the treatment of certain types of service providers, like VoIP providers.



THE CONSEQUENCES

- **Consumer Delays:** Due to the time required to complete customized port request forms and achieve an “error free port,” the cancellation rate is significantly higher when using a non-standardized port request forms.
- **Burdensome and Costly Port Process:** The customized port requests can change or be modified by a carrier up to four times a year, causing constant updating to porting procedures and associated provisioning systems. This results in delays in processing the consumer’s port request.
- **Unnecessary Disputes and Denials:** When trying to achieve “error free port requests” and/ or make modifications to accommodates changes to the port request form, disputes result between service providers, which are sometimes resolved by simply denying the consumer’s port request.
- **Regulatory Uncertainty:** Due to the vagueness of the rules, some service providers deny the port under the assumption it is “location” portability, and some service providers will port-in customers but not port-out customers (i.e., lack of reciprocity).



THE SOLUTION

- **Consumer Convenience:** Clear and simple rules will reduce the porting interval and facilitate timely processing of the consumer's "error free" port request.
- **Efficient Validation Process:** Adopt rules that establish four simple port request validation criteria (10-digit telephone number, account number, 5-digit zip code, and pass code if applicable), and define the port request form and format.
- **Elimination of Disputes and Denials:** Adopt rules that clearly identify "Covered Service Providers" that must comply and accept or deny the port request based upon defined validation criteria.
- **Regulatory Certainty and Reciprocity:** Adopt rules that require reciprocity and clarify a service provider's porting obligations, the procedures to be followed, and the time frame within which to complete the porting process.

