

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Telephone Number Portability) CC Docket No. 95-116
)
T-Mobile USA, Inc. and)
Sprint Nextel Corporation)
Petition for Declaratory Ruling)

OPPOSITION OF QWEST TO PETITION FOR DECLARATORY RULING

I. INTRODUCTION: THE PETITION IS DEFICIENT BOTH PROCEDURALLY AND SUBSTANTIVELY AND ACCORDINGLY SHOULD BE DENIED

Qwest¹ **opposes** the T-Mobile USA, Inc. and Sprint Nextel Corporation (collectively “Petitioners”) Petition for Declaratory Ruling (“Petition”) filed with the Federal Communications Commission (“Commission”) on December 20, 2006 and publicly noticed on January 9, 2007.² The Petition seeks to reduce the number of information elements shared between wireline and wireless carriers in a number porting context to only four (or about the number of elements currently used by wireless carriers for intramodal porting). The Petition is not only procedurally deficient, it is substantively deficient, as well. And it reflects an avoidance by the Petitioners of industry participation that is required not only by common sense but by Commission rule.

¹ This filing is being made on behalf of Qwest Corporation and Qwest Communications Corporation.

² See Petition for Declaratory Ruling, filed by T-Mobile USA, Inc. and Sprint Nextel Corporation, CC Docket No. 95-116, Dec. 20, 2006. *And see* Public Notice, DA 07-39, rel. Jan. 9, 2007.

As a threshold matter, the Petition is procedurally deficient. Contrary to its claim that it seeks to “remove uncertainty [or] end an ongoing controversy,”³ it does no such thing. Rather the Petition seeks to interject what it claims is a simple regulatory prescription into a complex area guided by long-standing industry practices and processes.

Moreover, Petitioners fail to demonstrate that a Declaratory Ruling is the preferred way to address any “controversy” that may exist with regard to T-Mobile’s and Sprint’s porting experiences. To the extent there are carriers that demand “excessive amounts” of information as part of their porting process (with the result that ports are unreasonably delayed by “weeks or months”),⁴ or if there are “LECs that use non-standard and lengthy validation processes,”⁵ Petitioners should escalate their concerns with the carrier or bring complaints against them.⁶ Alternatively, in line with the Commission’s existing rules, the Commission should direct Petitioners to the North American Numbering Council (“NANC”) for vetting, and possible resolution, of the matters raised in the Petition.⁷ Either option is more appropriate to address

³ Petition at 1.

⁴ *Id.* at 2 (“many incumbent LECs continue to impose outdated and unnecessarily arduous procedures, such as completion of port request forms with more than 100 data fields, before they will port out a number.”).

⁵ *Id.* at 5.

⁶ For example, if Petitioners believe that the volume of information required by Verizon or BellSouth is unwarranted (*see id.* at 4), they should bring complaints against these carriers.

⁷ *See* 47 C.F.R. § 52.26(b)(3), “The NANC shall provide ongoing oversight of number portability administration, including oversight of the regional LLCs [limited liability companies], subject to Commission review. **Parties shall attempt to resolve issues regarding number portability deployment among themselves and, if necessary, under the auspices of the NANC. If any party objects to the NANC’s proposed resolution, the NANC shall issue a written report summarizing the positions of the parties and the basis for the recommendation adopted by the NANC.**” (Emphasis added.)

specific carrier porting obstructions than is a general regulatory declaration modifying industry activities that may not run afoul of consensus and reasonable practices and standards.⁸

Additionally, the substance of the Petition lacks foundation. As Petitioners acknowledge, there is a pending rulemaking proceeding before the Commission, supplemented at the Commission's request⁹ by a recommendation from the NANC on porting intervals between wireline and wireless carriers.¹⁰ The kinds and amounts of information exchanged between carriers, as well as the format for exchange (*e.g.*, mechanized or manual) are material elements with respect to the length of any porting interval. The Petition, then, is but a backhanded (and not very subtle) attempt to incrementally direct the result of the larger rulemaking toward substantially shorter porting intervals. Delays in porting (*ergo*, quicker porting) could be achieved, according to Petitioners, by simply reducing the information elements currently

⁸ By way of example, Qwest's experiences with T-Mobile and Sprint/Nextel fail to support a critical need to reduce the amount of information exchanged in an intermodal port. Nor do those experiences suggest problems associated with undue porting complexity or delay. In the month of December 2006 (as a snapshot view of the situation), T-Mobile and Sprint combined entered 3,813 requests into Qwest's system to port numbers out from Qwest. Of those, some number most probably errored out due to what Qwest would call a "fatal error" (such as an incorrect phone number or improper form). In that case either T-Mobile or Sprint/Nextel would have been provided an opportunity to make appropriate changes. Setting apart these fatal-error situations, Qwest *rejected* five requests (due to a customer Local Service Freeze on the customer's account), one time Qwest asked for a request to be sent again due to a Qwest error and one time the request was rejected because the customer had a previous work order (such as a change to another carrier) already entered. This hardly evidences a serious problem begging for an industry-wide "solution".

⁹ See *In the Matter of Telephone Number Portability*, Second Further Notice of Proposed Rulemaking, 19 FCC Rcd 18515 (2004).

¹⁰ See [North American Numbering Council] NANC Report & Recommendation on Intermodal Porting Intervals, Prepared for the NANC by the Intermodal Porting Interval Issue Management Group, May 3, 2004 ("*NANC Intermodal Porting Interval Recommendation*"), submitted to the Commission by way of cover letter from Robert C. Atkinson, Chairman NANC to Mr. William Maher, Federal Communications Commission, dated May 3, 2004. The Petition urges the Commission to "codify" the recommendation. Petition at 17. Of course, where this done, it would modify the current codification associated with wireline porting practices. See 47 C.F.R. § 52.26(a).

exchanged between wireline and wireless carriers to just four (one more than some wireless carriers might use).

The Petition is a fine example of the proposition that if something seems too simple by way of a market correction it probably is. Petitioners attach what they argue to be a complex and excessive Local Service Record (“LSR”) utilized by an incumbent local exchange carrier (“LEC”) since intermodal porting began and suggest now -- years later -- that complexity associated with industry practices is the reason for undue delays in intermodal porting and high levels of customer cancellations, as well. They posit that their slimmed-down information exchange proposal as a solution to this complexity, with the suggested consequence being that delays and cancellations would be reduced. But the Petition is framed around a variety of logical fallacies ranging from oversimplification¹¹ to an unproven link between the contents of LSRs used by LECs and porting delays or cancellations.¹²

Attached to this filing is a NANC porting flow process document¹³ that belies the simplicity of Petitioner’s request for relief. That document clearly demonstrates the complexity

¹¹ The Petition suffers from the logical fallacy of “Reductive Fallacy (Oversimplification)” which is the fallacy of over-simplifying. This fallacy is also described as “*plurium interrogationum*--any questions” reflecting a demand for simple answers to complex questions.

¹² This would be the logical fallacy of *non sequitur* (“It does not follow”). This is the simple fallacy of stating, as a conclusion, something that does not strictly follow from the premises. Petitioners argue that there is a high cancellation rate associated with wireless/wireline ports due to some misfeasance of incumbent LECs and nowhere acknowledge that other factors might influence such cancellations. Such factors might include a realization by a customer that some incidental service associated with the wireline loop might be “lost” if the number is ported, or a customer intent on porting might change position after reviewing the contractual restrictions of the wireless carrier (including required terms of service or cancellation penalties).

¹³ See Attachment 1, found at www.npac.com, a web site maintained by NeuStar for the industry, in the “LNPA WG Documents,” Section “Miscellaneous Documents” and entitled “Updated Flows, Version 2.0 – Inter-Service Provider Operations Flows and Narratives,” approved by NANC and forwarded to the Commission on October 27, 2003; the files are:

of the porting process at an implementation level and the critical nature of industry participation and consensus in the process. Anyone familiar with number porting and industry activity knows that the *concept* of number porting is simple; the *execution* is fairly complex.

The Commission should deny the instant Petition and move forward to address the NANC porting interval recommendation. By working within the construct of the pending rulemaking -- including record evidence on implementation timeframes and costs associated with changing porting intervals (which might include a reduced set of information exchanges) -- the Commission can best aid the industry in making number porting increasingly efficient for carriers and customers alike.

II. THE PETITION IS PROCEDURALLY FLAWED AND IMPROPERLY SEEKS A DECLARATION ABOUT MATTERS CURRENTLY SUBJECT TO AN ONGOING RULEMAKING

The Petition, despite its claim, does not really seek a “clarification” of any established Commission principle or rule. Rather, it seeks to supplant an ongoing rulemaking proceeding by inviting the Commission to “declare” something that materially would affect wireline/wireless intermodal porting intervals -- the subject of a pending rulemaking.

It is settled law that a contested issue may not be resolved through a declaratory ruling unless undisputed facts and governing law entitle Petitioners to relief.¹⁴ In the instant case, there can be no credible argument -- given the “everything in a single pot” approach of Petitioners -- that the facts are clearly developed and undisputed such that they could be terminated by grant of

NANC_Ops_Flows_Narratives_v2.0a.doc; updated March 5, 2004, incorporated herein by this reference.

¹⁴ See, e.g., *In the Matter of American Network, Inc. Petition for Declaratory Ruling Concerning Backbilling of Access Charges*, Memorandum Opinion and Order, 4 FCC Rcd 550, 551-52 ¶ 18 (Com.Car.Bur. 1989); *In the Matter of Competitive Telecommunications Association Petition for Declaratory Ruling and Cease and Desist Order Concerning Blocking of Interim 800 Service Interexchange Access*, Memorandum Opinion and Order, 4 FCC Rcd 5364, 5365 ¶ 7 (Com.Car.Bur. 1989). And see *Sprint Corp. v. FCC*, 315 F.3d 369 (D.C. Cir. 2003).

a declaratory ruling petition.¹⁵ Petitioners clearly seek to “change[] the rules of the game”¹⁶ materially affecting the balance of dual responsibilities. In such a situation, when “one source becomes solely responsible for what had been a dual responsibility,”¹⁷ a declaratory petition proceeding is not the appropriate procedural vehicle.

III. THE PETITION IS SUBSTANTIVELY FLAWED IN SUGGESTING THAT WIRELINE CARRIERS CAN SIMPLY HALT THEIR CURRENT PORTING PROCESSES AND SUCCESSFULLY PORT NUMBERS WITH ONLY FOUR INFORMATION ELEMENTS

The relief sought by the Petition would have this Commission change an established industry form (the LSR)¹⁸ to eliminate certain information fields that are currently part of the porting process between wireline/wireless carriers. Eliminating most information fields in an LSR, and requiring only four pieces of information be exchanged between carriers,¹⁹ *might* speed

¹⁵ See proceedings referenced in note 14 and *Request for Declaratory Ruling by Harry Furgatch*, 2 FCC Rcd 1656 ¶¶ 3-4 (1987).

¹⁶ *Sprint Corp. v. FCC*, 315 F.3d at 374 (when “one source becomes solely responsible for what had been a dual responsibility and then must assume additional obligations . . . more than a clarification has occurred. To conclude otherwise would intolerably blur the line between when the [Administrative Procedure Act] APA notice requirement is triggered and when it is not.”).

¹⁷ *Id.* In this case, Petitioners seek to abdicate or absolve themselves from what is clearly, currently, a dual responsibility (*i.e.*, the successful execution of a port using the forms of the old service provider) and to institute a “sole responsibility” of the wireline carrier to conform to the processes of wireless carriers.

¹⁸ The LSR is a form promulgated by the Ordering and Billing Forum (“OBF”) of the Alliance of Telecommunications Industry Solutions (“ATIS”). The OBF’s home page describes itself as “a forum for customers and providers in the telecommunications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning and exchange of information about access services, other connectivity and related matters.” A fairly significant charge to be sure. The subcommittee associated with LSRs (what it calls the “Unified Ordering Model”) states as its mission to be “responsible for developing, evolving and managing the Unified Modeling Approach (UMA) process that defines information models, electronic interface specifications and implementation guidelines associated with local service ordering and provisioning processes.”

¹⁹ Petitioners ask the Commission to “declare” that only four pieces of information need to be exchanged between wireless and wireline carriers to accomplish a port. Specifically, the Petition argues that only “four data fields -- (1) 10-digit telephone number; (2) customer account number;

up wireless-wireline porting; or it might simply make it more difficult for the wireline carrier to port out.²⁰ The puts-and-takes on this kind of porting process change are precisely the kinds of matters that are best taken up and resolved in industry fora. The consensus position on such matters becomes reflected in industry forums and NANC recommendations.

Petitioners ill-advisedly seek Commission assistance to reduce the number of information elements potentially exchanged between carriers in a claimed effort to reducing the “delay” associated with porting between wireless and wireline carriers.²¹ Yet the ultimate objective Petitioners seek is to have the wireline porting processes more closely replicate the wireless ones. The Petition is replete with positive references to “wireless-to-wireless porting” contexts, with the none to subtle suggestion that only by replicating that context will the public interest be protected.²² But the wireless-to-wireless porting processes (including information elements needed to be exchanged and the relationship of the information exchange to the porting intervals) were established by the wireless industry itself.²³ And the suitability of those processes to an intermodal porting context are the subject of a pending rulemaking proceeding.

(3) 5-digit zip code; and (4) pass code, if applicable” be required “regardless of the type of provider to whom the port is directed.” Petition at 7.

²⁰ *NANC Intermodal Porting Interval Recommendation* at 13 noting that “[t]he [current porting interval of 4 days was] negotiated by the wireline carriers in order to perform all of the system updates and any physical work required to accomplish the port.”

²¹ Petition at 6. *And see NANC Intermodal Porting Interval Recommendation* at 15 (“A reduction in the intermodal porting interval could be feasible if all carriers used the same validation criteria as the major wireless carriers. These validation criteria are the ported number, social security number or account number or tax identification number, five-digit zip code, and pin or pass code if applicable.”).

²² Petition at 2 (comparing the current intermodal porting processes “to the intramodal wireless porting mechanism in use today” and noting that simple wireless-to-wireless ports are usually accomplished within hours). *See also id.* at notes 6-8, 12 and 13 and accompanying text.

²³ *NANC Intermodal Porting Interval Recommendation* at 11 (“The wireless industry’s customer acquisition and provisioning systems are all geared to meet [a customer’s expectation to leave a point of sale with functioning service]. Thus, to satisfy the wireless business model, the wireless

It is undoubtedly true that the fact that different LECs use different forms with respect to their porting out process creates frustration among carriers, particularly since it is a generally accepted industry practice that the forms of the “old” service provider (that provider porting out) control the process.²⁴ But the solution is *not* to seek a declaration from the Commission that the forms are “deficient” or fatally flawed. Rather, the proper process would be to work aggressively within the appropriate industry organizations to secure a change in the forms themselves or in the minimum information exchange required by the forms to support a successful port.

It would be poor policy and process for the Commission, in response to an ill-informed Petition, to reverse current industry practices and forms -- particularly when both have been crafted with an eye toward the different business models and practices of the two industries. Until such time as that rulemaking is concluded, the Commission should reject invitations to insinuate itself into consensus industry positions on porting forms²⁵ and processes. This is

industry agreed to . . . a total of a 2-1/2 hour wireless porting interval for a simple port request.”). *And see* Petition at 4 (making clear the “within the wireless industry” character of the changes agreed on by wireless carriers with respect to ports occurring with other wireless carriers).

²⁴ In the *NANC Intermodal Porting Interval Recommendation* currently before the Commission (*id.* at 28), it is noted that “The industry may consider establishing one common [Local Service Ordering Guideline] 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. Currently, each LEC may choose a different LSOG version based on their business needs to process consumer updates including porting. The standard in porting is to use the Old Service Provider’s (OSP) forms. To automate porting requests, a service provider must be able to automatically process any LSOG version . . . that the OSP may be using.”

²⁵ “When a customer decides to port their number the new service provider collects information from the customer that is necessary for porting. The information gathered is used by the new service provider to prepare a LSR that is sent to the old service provider. *The LSR is an industry standard form developed by the Ordering & Billing Forum.*” *Id.* at 6 (emphasis added). In Qwest’s case, its LSR documents do not require undue amounts of information; and, quite often,

particularly true since changing any elements of an industry-standard form or process would entail significant systems work for wireline carriers²⁶ and would require an extended implementation period to accomplish.²⁷

Respectfully submitted,

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the necessary information is mechanically populated for the carrier requesting the port in a “flow-through-system” methodology.

²⁶ Any change in the information elements exchanged through the currently-agreed upon LSR would likely affect many of the same types of systems as would a substantive change in the porting interval itself. *See id.* at 9 (noting that changing the porting interval would affect “providers’ provisioning, routing, billing, maintenance, and administrative systems”), 14 (“Carriers may need to modify their Operational Support Systems (OSS) Service Order Entry Systems (SOE), Service Order Administration (SOA), Local Service Management System (LSMS) to use the shorter intermodal porting interval.”).

²⁷ *Id.* at 4 (reducing the porting interval would take approximately 24 months to implement), 14 (“a transition period commensurate with the system design changes should be allowed after the FCC mandates the new porting interval. This time period would allow carriers time to design, budget, and implement the new porting interval within their respective networks and associated systems.”).

ATTACHMENT 1

Inter-Service Provider LNP Operations Flows - Narratives

Narratives: Following are the textual descriptions of the Inter-Service Provider LNP Operations Flows. These narratives provide a detailed description of the step-by-step flows.

Legend:

NLSP = New Local Service Provider

NNSP = New Network Service Provider

OLSP = Old Local Service Provider

ONSP = Old Network Service Provider

SV = Subscription Version

SP = Service Provider

FRS = Functional Requirements Specification

IIS = Interoperability Interface Specifications

LSR = Local Service Request

FOC = Firm Order Confirmation

ICP = Intercarrier Communication Process

WPR = Wireless Port Request

WPRR = Wireless Port Request Response

CSR = Customer Service Record

TN = Telephone Number

“via the SOA interface” = generic description for one of the following: the SOA CMIP association, LTI, or contacting NPAC personnel

Inter-Service Provider LNP Operations Flows - Narratives

Provisioning With LRN

Main Flow, Figure 1

Flow Step	Description
1. START: End User Contact with NLSP	<ul style="list-style-type: none"> • The process begins with an end-user requesting service from the NLSP. • It is assumed that prior to entering the provisioning process the involved NPA/NXX was opened for porting (If code is not open, refer to Inter-Service Provider LNP Operations Flows – Code Opening Process, Figure 13.).
2. End User agrees to change to NLSP	<ul style="list-style-type: none"> • End-user agrees to change to NLSP and requests retention of current telephone number (TN).
3. NLSP obtains end user authorization	<ul style="list-style-type: none"> • NLSP obtains authority (Letter of Authorization - LOA) from end-user to act as the official agent on behalf of the end-user. The NLSP is responsible for demonstrating necessary authority.
4. (Optional) NLSP requests CSR from OLSP	<ul style="list-style-type: none"> • As an optional step, the NLSP requests a Customer Service Record (CSR) from the OLSP. A service agreement between the NLSP and OLSP may or may not be required for CSR.
5. Are both NNSP and ONSP wireless?	<ul style="list-style-type: none"> • If yes, go to Step 7. • If no, go to Step 6.
6. LSR/FOC – Service Provider Communication	<ul style="list-style-type: none"> • Inter-Service Provider LNP Operations Flows – Wireline LSR/FOC Process, Figure 2.
7. ICP – Service Provider Communication	<ul style="list-style-type: none"> • Inter-Service Provider LNP Operations Flows – Wireless ICP Process, Figure 3.
8. Are NNSP and ONSP the same SP?	<ul style="list-style-type: none"> • If yes, go to Step 10. • If no, go to Step 9.
9. NNSP coordinates all porting activities	<ul style="list-style-type: none"> • The NNSP must coordinate porting timeframes with the ONSP, and both provide appropriate messages to the NPAC. Upon completion of the LSR/FOC or ICP Process, and when ready to initiate service orders, go to Step 12.
10. Is NPAC processing required?	<ul style="list-style-type: none"> • If yes, go to Step 11. • If no, go to Step 20.
11. Perform intra-provider port or modify existing SV	<ul style="list-style-type: none"> • NNSP enters intra-provider SV create data into the NPAC via the SOA interface for porting of end-user in accordance with the NANC FRS and the NANC IIS. Upon completion of intra-provider port, go to Step 20.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
12. NNSP and ONSP create and process service orders	<ul style="list-style-type: none"> Upon completion of the LSR/FOC or ICP Process, the NNSP and ONSP create and process service orders through their internal service order systems, based on information provided in the LSR/FOC or WPR/WPRR.
13. Create – Service Provider Port Request	<ul style="list-style-type: none"> Inter-Service Provider LNP Operations Flows – Service Provider Create Process, Figure 4.
14. Was port request canceled?	<ul style="list-style-type: none"> The port was canceled by the ONSP, the NNSP, or automatically by an NPAC process. If yes, go to Step 17. If no, go to Step 15.
15. Did ONSP place the order in Conflict?	<ul style="list-style-type: none"> Check Concurrence Flag. If concurred, the ONSP agrees to the port. If NOT concurred, a conflict cause code as defined in the FRS, is designated. ONSP makes a concerted effort to contact NNSP prior to placing SV in conflict. <ul style="list-style-type: none"> For wireline SPs, the conflict request can be initiated up to the later of a.) the tunable time (Conflict Restriction Window, current value of 12:00) one business day before the Due Date or b.) the T2 Timer (Final Concurrence Window tunable parameter) has expired. For wireless SPs using short timers for this SV, the conflict request can be initiated up to the time the T2 Timer (Final Concurrence Window tunable parameter) has expired. If yes, go to Step 16. If no, go to Step 18.
16. NPAC logs request to place the order in conflict, including cause code	<ul style="list-style-type: none"> Go to Inter-Service Provider LNP Operations Flows - Conflict Flow for the Service Creation Provisioning Process - tie point B, Figure 8.
17. Notify Reseller – NPAC notifies NNSP and ONSP that port is canceled	<ul style="list-style-type: none"> Upon cancellation, NPAC logs this information, and changes the subscription status to <i>canceled</i>. Both SPs are notified of the change in the subscription status via the SOA interface. For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. Both SPs take appropriate action related to internal work orders.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
18. NNSP coordinates physical changes with ONSP	<ul style="list-style-type: none"> • The NNSP has the option of requesting a coordinated order. This is also the re-entry point from the Inter-Service Provider LNP Operations Flows – Conflict Flow for the Service Creation Provisioning Process, tie point BB, Figure 8. • If coordination is requested on the LSR, an indication of Yes or No for the application of a 10-digit trigger is required. If no coordination indication is given, then by default, the 10-digit trigger is applied as defined by inter-company agreements between the involved service providers. If the NNSP requests a coordinated order and specifies ‘no’ on the application of the 10-digit trigger, the ONSP uses the 10-digit trigger at its discretion.
19. Is the unconditional 10 digit trigger being used?	<ul style="list-style-type: none"> • The unconditional 10-digit trigger is an option assigned to a number on a donor switch during the transition period when the number is physically moved from donor switch to recipient switch. During this period it is possible for the TN to reside in both donor and recipient switches at the same time. • The unconditional 10-digit trigger may be applied by the NNSP. A 10-digit trigger is applied by the ONSP no later than the day prior to the due date. • If yes, go to Inter-Service Provider LNP Operations Flows - Provisioning with Unconditional 10-Digit Trigger - tie point AA, Figure 7. • If no, go to Inter-Service Provider LNP Operations Flows - Provisioning without Unconditional 10-digit Trigger - tie point A, Figure 6.
20. End	<ul style="list-style-type: none"> • End of the Inter-Service Provider LNP Operations Flows – Main Flow. • This is also the re-entry point from various flows, tie point Z.

Inter-Service Provider LNP Operations Flows - Narratives

Wireline LSR/FOC Service Provider Communication

Flow LSR/FOC, Figure 2

Flow Step	Description
1. Is end user porting all TNs?	<ul style="list-style-type: none"> • This is the entry point from the Inter-Service Provider LNP Operations Flows – Main Flow, LSR/FOC Process, Step 6, Figure 1. • The NLSP determines if customer is porting all TN(s). • If yes, go to Step 3. • If no, go to Step 2.
2. NLSP notes “Not all TNs are being ported” in the remarks field of LSR	<ul style="list-style-type: none"> • The NLSP makes a note in the remarks section of the LSR to identify that the end-user is not porting all TN(s). This can affect the due date interval due to account rearrangements necessary prior to service order issuance.
3. Is NLSP a Reseller?	<ul style="list-style-type: none"> • If yes, go to Step 4. • If no, go to Step 5.
4. NLSP sends LSR or LSR information to NNSP for resale service	<ul style="list-style-type: none"> • NLSP (Reseller) sends an LSR or LSR Information to the NNSP fulfilling all requirements of any service agreement between the involved service providers. The LSR process is defined by the Ordering and Billing Forum (OBF) and the electronic interface by the Telecommunications Industry Forum (TCIF). The information required on the LSR may vary based on the carriers involved.
5. NNSP sends LSR to ONSP	<ul style="list-style-type: none"> • The NNSP notifies the ONSP of the port using the LSR and sends the information via an electronic gateway, FAX, or manual means. The LSR process is defined by the Ordering and Billing Forum (OBF) and the electronic interface by the Telecommunications Industry Forum (TCIF). The information required on the LSR may vary based on the carriers involved.
6. Is OLSP a Reseller or is a Type 1 wireless number involved?	<ul style="list-style-type: none"> • In a wireline flow scenario, these are numbers that use a Type 1 wireless interconnection. • If yes, go to Step 7. • If no, go to Step 9.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
7. Notify Reseller – (conditional) ONSP sends LSR, LSR information, or Loss Notification to OLSP	<ul style="list-style-type: none"> • (conditional, based on any service agreement between the involved service providers) – ONSP sends an LSR, LSR Information, or Loss Notification to the OLSP (Reseller or if a Type 1 number is involved) fulfilling all requirements. The LSR process is defined by the Ordering and Billing Forum (OBF) and the electronic interface by the Telecommunications Industry Forum (TCIF). The information required on the LSR may vary based on the carriers involved. • (conditional, , based on any service agreement between the involved service providers) – A Loss Alert/Notification may be sent to the OLSP. The specific timing will be based on the requirements of any service agreement between the involved service providers.
8. (conditional) OLSP sends FOC or FOC information to ONSP	<ul style="list-style-type: none"> • (conditional, based on any service agreement between the involved service providers) – The OLSP notifies the ONSP of the porting using the FOC and sends the information via an electronic gateway, FAX, or other means. The LSR/FOC process is defined by the Ordering and Billing Forum (OBF) and the electronic interface by the Telecommunications Industry Forum (TCIF). The information required on the FOC may vary based on the carriers involved.
9. ONSP sends FOC to NNSP	<ul style="list-style-type: none"> • ONSP sends the firm order confirmation (FOC, local response) to the NNSP for the porting LSR. • For wireline to wireline service providers, and between wireline and wireless service providers, the minimum expectation is that the FOC is returned within 24 hours excluding weekends unless otherwise defined by inter-company agreements, between the involved service providers. It is the responsibility of the ONSP to contact the NNSP if the ONSP is unable to meet the 24 hour expectation for transmitting the FOC. If the FOC is not received by the NNSP within 24 hours, then the NNSP contacts the ONSP. When the OLSP is a reseller or a Type 1 number is involved, the LSR/FOC process time could take longer than 24 hours. • The due date of the first TN ported in an NPA-NXX is no earlier than five (5) business days after FOC receipt date. Any subsequent port in that NPA NXX will have a due date no earlier than three (3) business days after FOC receipt. It is assumed that the porting interval is not in addition to intervals for other requested services (e.g., unbundled loops) related to the porting request. The interval becomes the longest single interval required for the services requested. • The LSR/FOC process is defined by the Ordering and Billing Forum (OBF) and the electronic interface by the Telecommunications Industry Forum (TCIF). The information required on the FOC may vary based on the carriers involved.
10. Is NLSP a Reseller?	<ul style="list-style-type: none"> • If yes, go to Step 11. • If no, go to Step 12.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
11. NNSP forwards FOC or FOC Information to NLSP	<ul style="list-style-type: none">• NNSP forwards FOC or FOC Information to NLSP fulfilling all requirements of any service agreement between the involved service providers. The LSR/FOC process is defined by the Ordering and Billing Forum (OBF) and the electronic interface by the Telecommunications Industry Forum (TCIF). The information required on the FOC may vary based on the carriers involved.
12. Return to Figure 1	<ul style="list-style-type: none">• Return to main flow, LSR/FOC Process, Step 6.

Inter-Service Provider LNP Operations Flows - Narratives

Wireless ICP Service Provider Communication

Flow ICP (Intercarrier Communication Process), Figure 3

Flow Step	Description
1. Is NLSP a Reseller?	<ul style="list-style-type: none"> • This is the entry point from the Inter-Service Provider LNP Operations Flows – Main Flow, ICP Process, Step 7. • The NLSP determines if customer is porting all TN(s). • If yes, go to Step 2. • If no, go to Step 3.
2. NLSP sends WPR or WPR information to NNSP for resale service	<ul style="list-style-type: none"> • NLSP (Reseller) sends a WPR (Wireless Port Request) or WPR information to the NNSP (may vary slightly depending on provider agreement between the involved service providers). • For wireless to wireless service providers the WPR/WPRR (Wireless Port Request/Wireless Port Request Response) initial response time frame is 30 minutes. • The due date of the first TN ported in an NPA-NXX is no earlier than 5 business days after a confirming WPRR receipt date. • The due date for a TN ported in an NPA-NXX which has TNs already ported is no earlier than 2 business hours after a confirming WPRR receipt date/time or as currently determined by NANC.
3. NNSP sends WPR to ONSP	<ul style="list-style-type: none"> • The NNSP notifies the ONSP of the port request using the WPR and sends the information via CORBA or FAX. • ICP response interval, currently set to 30 minutes, begins from acknowledgment being received by NNSP from ONSP, and not at the time the WPR is sent from the NNSP to the ONSP.
4. Is a Type 1 wireless number involved?	<ul style="list-style-type: none"> • If yes, go to Step 5 • If no, go to Step 8.
5. ONSP sends WPRR rejection to NNSP	<ul style="list-style-type: none"> • ONSP identifies the number as using a Type 1 wireless interconnection, and returns a WPRR to the NNSP rejecting the request for this Type 1 number.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
6. Change code owner to Old Wireline SP in NPAC and possibly LERG, as necessary	<ul style="list-style-type: none"> • The code holder of the NPA-NXX is not the Old Wireline SP. • To maintain proper NPA-NXX ownership reference, the NPAC data must reflect the Old Wireline SP as the code holder, therefore update as necessary. This allows the NNSP to determine the recipient ONSP of the resultant LSR (Figure 2, Wireline LSR/FOC Process). • An NNSP may alternatively use the LERG for NPA-NXX ownership reference to determine the recipient ONSP of the resultant LSR (Figure 2, Wireline LSR/FOC Process). Therefore, in the case of a shared code, the LERG data should also be updated to reflect the Old Wireline SP as the code holder. NOTE: In the case of a dedicated code, the LERG data should not be changed as this would violate LERG assignment guidelines. <p>NOTE: Once the migration of Type 1 interconnected telephone numbers is complete, the number is no longer a Type 1 number (there is no such thing as a “migrated Type 1 number”), but is now considered Type 2.</p>
7. Re-start process, return to Figure 1	<ul style="list-style-type: none"> • The NNSP reference to the recipient of the WPR has been changed to a wireline SP, and must now follow the LSR/FOC process. • Re-start the intercarrier communication process by returning to main flow Figure 1, Steps 5/6, since this is no longer a “both are wireless carriers” scenario.
8. Is OLSP a reseller?	<ul style="list-style-type: none"> • If yes, go to Step 9. • If no, go to Step 11.
9. ONSP sends WPR or WPR information to OLSP	<ul style="list-style-type: none"> • The ONSP notifies the OLSP of the port request using the WPR or WPR information.
10. OLSP sends WPRR or WPRR information to ONSP	<ul style="list-style-type: none"> • The OLSP sends the ONSP the WPRR or WPRR information.
11. ONSP sends WPRR to NNSP	<ul style="list-style-type: none"> • ONSP sends the WPRR to the NNSP. • IC terminates upon receipt of WPRR by NNSP.
12. Is NLSP a reseller?	<ul style="list-style-type: none"> • If yes, go to Step 13. • If no, go to Step 14.
13. NNSP forwards WPRR or WPRR information to NLSP	<ul style="list-style-type: none"> • The NNSP sends the WPRR or WPRR information to the NLSP.
14. Is WPRR a Delay?	<ul style="list-style-type: none"> • If yes, go to Step 15. • If no, go to Step 16.
15. Is OLSP a reseller?	<ul style="list-style-type: none"> • If yes, go to Step 10. • If no, go to Step 11.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
16. Is WPRR confirmed?	<ul style="list-style-type: none">• If yes, go to Step 18.• If no, go to Step 17 – WPRR must be a Resolution Required.
17. WPRR is a resolution response	<ul style="list-style-type: none">• Return to Step 1.
18. Return to Figure 1	<ul style="list-style-type: none">• Return to main flow Figure 1, ICP Process, Step 7.

Service Provider Port Request

Flow Create, Figure 4

Flow Step	Description
1. NNSP and (optionally) ONSP notify NPAC with Create message	<ul style="list-style-type: none"> • Due date of the create message is the due date on the FOC, where wireline due date equals date and wireless due date equals date and time. For porting between wireless and wireline, the wireline due date applies. Any change of due date to the NPAC is usually the result of a change in the FOC due date. • SPs enter SV data into the NPAC via the SOA interface for porting of end-user in accordance with the NANC FRS and the NANC IIS.
2. Is Create message valid?	<ul style="list-style-type: none"> • NPAC validates data to ensure value formats and consistency as defined in the FRS. This is not a comparison between NNSP and ONSP messages. • If yes, go to Step 4. If this is the first valid create message, the T1 Timer (Initial Concurrence Window tunable parameter) is started. SV Create notifications are sent to both the ONSP and NNSP. • If no, go to Step 3.
3. NPAC notifies appropriate Service Provider that create message is invalid	<ul style="list-style-type: none"> • If the data is not valid, the NPAC sends error notification to the SP for correction. • The SP, upon notification from the NPAC, corrects the data and resubmits to the NPAC. Re-enter at Step 1.
4. NPAC starts T1 timer	<ul style="list-style-type: none"> • Upon receipt of the first valid create message, the NPAC starts the T1 Timer (Initial Concurrence Window tunable parameter). The value for the T1 Timer is configurable (one of two values) for SPs. SPs will use either long or short timers. The current value for the long timer (typically any wireline involved porting) is nine (9) business hours. The current value for the short timer (typically wireless-to-wireless porting) is one (1) business hour.
5. T1 expired?	<ul style="list-style-type: none"> • NPAC timers include business hours only, except where otherwise specified. Short business hours are defined as 7a-7p CT (business day start at 13:00/12:00 GMT, duration of 12 hours). Long business hours are planned for 9a-9p in the predominant time zone for each NPAC region (business day start – NE/MA/SE 14:00/13:00 GMT, MW/SW/Canadian 15:00/14:00 GMT, WE 16:00/15:00 GMT, WC 17:00/16:00 GMT, duration of 12 hours). Short Business Days are currently defined as Monday through Friday, except holidays, and Long Business Days are currently defined as Sunday through Saturday (seven days a week), except holidays. Holidays and business hours are defined for each NPAC Region. • If yes, go to Step 10. • If no, go to Step 6.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
6. Received Second Create?	<ul style="list-style-type: none"> • If yes, go to Step 7. • If no, return to Step 5.
7. Is Create message valid?	<ul style="list-style-type: none"> • If yes, go to Step 8. • If no, go to Step 9.
8. Return to Figure 1	<ul style="list-style-type: none"> • The porting process continues. • Return to main flow Figure 1, Create Process, Step 13.
9. NPAC notifies appropriate Service Provider that Create message is invalid	<ul style="list-style-type: none"> • The NPAC informs the SP of an invalid create. If necessary, the notified Service Provider coordinates the correction.
10. NPAC notifies NNSP and ONSP that T1 has expired, and then starts T2 Timer	<ul style="list-style-type: none"> • The NPAC informs the NNSP and ONSP of the expiration of the T1 Timer. • Upon expiration, the NPAC starts the T2 Timer (Final Concurrence Window tunable parameter).
11. T2 Expired?	<ul style="list-style-type: none"> • The NPAC provides a T2 Timer (Final Concurrence Window tunable parameter) that is defined as the number of hours after the expiration of the T1 Timer. • The value for the T2 Timer (Final Concurrence Window tunable parameter) is configurable (one of two values) for Service Providers. Service Providers will use either long or short timers. The current value for the long timer is nine (9) hours. The current value for the short timer is one (1) hour. • NPAC timers include business hours only, except where otherwise specified. Short business hours are defined as 7a-7p CT (business day start at 13:00/12:00 GMT, duration of 12 hours). Long business hours are planned for 9a-9p in the predominant time zone for each NPAC region (business day start – NE/MA/SE 14:00/13:00 GMT, MW/SW/Canadian 15:00/14:00 GMT, WE 16:00/15:00 GMT, WC 17:00/16:00 GMT, duration of 12 hours). Short Business Days are currently defined as Monday through Friday, except holidays, and Long Business Days are currently defined as Sunday through Saturday (seven days a week), except holidays. Holidays and business hours are defined for each NPAC Region. • If yes, go to Step 15. • If no, go to Step 12.
12. Receives Second Create?	<ul style="list-style-type: none"> • If yes, go to Step 13. • If no, return to Step 11.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
13. Is Create message valid?	<ul style="list-style-type: none"> • If yes, go to Step 19. • If no, go to Step 14.
14. NPAC notifies appropriate service provider that Create message is invalid	<ul style="list-style-type: none"> • The NPAC notifies the service provider that errors were encountered during the validation process. • Return to Step 11.
15. Did NNSP send Create?	<ul style="list-style-type: none"> • If yes, go to Step 20. • If no, go to Step 16.
16. NPAC notifies NNSP and ONSP that T2 has expired	<ul style="list-style-type: none"> • The NPAC notifies both NNSP and ONSP of T2 expiration.
17. Has cancel window for pending SVs expired?	<ul style="list-style-type: none"> • If yes, go to Step 18. • If no, return to Step 12.
18. NPAC notifies NNSP and ONSP that port is canceled	<ul style="list-style-type: none"> • The SV is canceled by NPAC by tunable parameter (30 days). Both SPs take appropriate action related to internal work orders. • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5.
19. Return to Figure 1	<ul style="list-style-type: none"> • Return to main flow Figure 1, Create Process, Step 13.
20. NPAC notifies ONSP that porting proceeds under the control of the NNSP	<ul style="list-style-type: none"> • A notification message is sent to the ONSP noting that the porting is proceeding in the absence of any message from the ONSP.

Reseller Notification Process

Reseller Notification Flow, Figure 5

Flow Step	Description
1. Is OLSP a reseller?	<ul style="list-style-type: none"> • If yes, go to Step 2. • If no, go to Step 4.
2. Does OLSP need message?	<ul style="list-style-type: none"> • If yes, go to Step 3. • If no, go to Step 4.
3. ONSP sends or provides information and/or message to OLSP	<ul style="list-style-type: none"> • ONSP (Network Provider) sends or provides information and/or message to the OLSP (Reseller) fulfilling all requirements of any service agreement between the involved service providers.
4. Is NLSP a reseller?	<ul style="list-style-type: none"> • If yes, go to Step 5. • If no, go to Step 7.
5. Does NLSP need message?	<ul style="list-style-type: none"> • If yes, go to Step 6. • If no, go to Step 7.
6. NNSP sends or provides information and/or message to NLSP	<ul style="list-style-type: none"> • NNSP (Network Provider) sends or provides information and/or message to the NLSP (Reseller) fulfilling all requirements of any service agreement between the involved service providers.
7. Return	<ul style="list-style-type: none"> • Return to previous flow.

Inter-Service Provider LNP Operations Flows - Narratives

Provisioning Without Unconditional 10-Digit Trigger

Flow A, Figure 6

Flow Step	Description
NOTE: Steps 1 and 2 are worked concurrently.	
1. NNSP activates port (locally)	<ul style="list-style-type: none"> • This is the entry point from the Inter-Service Provider LNP Operations Flows – Main Flow, tie point A, Figure 1. • The Wireline NNSP activates its own Central Office translations. • As an optional step, the Wireless NNSP activates its own switch/HLR configuration including assignment of Mobile Station Identifier (MSID).
NOTE: Steps 2 and 3 may be worked concurrently.	
2. NNSP and ONSP make physical changes (where necessary)	<ul style="list-style-type: none"> • Wireline physical changes may or may not be coordinated. Coordinated physical changes are based on inter-connection agreements between the involved service providers. • Mobile Station (handset) changes are completed. • The NNSP is now providing dial tone to ported end user.
3. NNSP notifies NPAC to activate the port	<ul style="list-style-type: none"> • The NNSP sends an activate message to the NPAC via the SOA interface. • No NPAC SV may activate before the SV due date/time. • If not done in step 1 above, the Wireless NNSP activates its own switch/HLR configuration including assignment of Mobile Station Identifier (MSID).
NOTE: Steps 4, 5, 6, and 7 may be concurrent, but at a minimum should be completed ASAP.	
4. NPAC downloads (real time) to all service providers	<ul style="list-style-type: none"> • The NPAC broadcasts new SV data to all SP LSMSs in the serving area in accordance with the NANC FRS and NANC IIS. The Service Control Point (SCP) Applications and GTT Function for Number Portability requirements are defined by T1S1.6.
5. NPAC records date and time in history file	<ul style="list-style-type: none"> • The NPAC records the current date and time as the Activation Date and Time stamp, at the start of the broadcast. The Activation Complete Timestamp is based on the first LSMS that successfully acknowledged receipt of new SV.
6. Wireline ONSP removes translations in Central Office. Wireless ONSP removes subscriber from switch/HLR	<ul style="list-style-type: none"> • The Wireline ONSP initiates the removal of translation either at designated Due Date and Time, or if the order was designated as coordinated, upon receipt of a call from the NNSP. • The Wireless ONSP initiates the removal of the subscriber record from the switch/HLR after the activation of the port. • As an optional step, if the OLSP is a reseller, the ONSP should send a Loss Notification to the OLSP (indicator to stop billing).

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
7. NPAC logs failures and non-responses and notifies the NNSP and ONSP	<ul style="list-style-type: none"> The NPAC resends the activation to an LSMS that did not acknowledge receipt of the request, based on the retry tunable and retry interval. The number of NPAC SMS attempts to send is a tunable parameter for which the current setting is one (1) attempt, in which case no retry attempts are performed. Once this cycle is completed, NPAC personnel, when requested, investigate possible problems. In addition, the NPAC sends a notification via the SOA interface to both NNSP and ONSP with a list of LSMSs that failed activation.
8. All service providers update routing databases (real time download)	<ul style="list-style-type: none"> This is an internal process and is performed in accordance with the Service Control Point (SCP) Applications and GTT Function for Number Portability requirements as defined by T1S1.6 (within 15 minutes).
9. NNSP may verify completion	<ul style="list-style-type: none"> The NNSP may make test calls to verify that calls to ported numbers complete as expected.
Z. End	<ul style="list-style-type: none"> Return to main flow, tie point Z, Figure 1.

Inter-Service Provider LNP Operations Flows - Narratives

Provisioning With Unconditional 10-Digit Trigger

Flow AA, Figure 7

Flow Step	Description
1. ONSP activates unconditional 10 digit trigger in the central office	<ul style="list-style-type: none"> • This is the entry point from the Inter-Service Provider LNP Operations Flows – Main Flow, tie point AA, Figure 1. • The actual time for trigger activation is defined on a regional basis. • The unconditional 10-digit trigger may optionally be applied by the NNSP.
NOTE: Steps 2 and 3 may be worked concurrently.	
2. NNSP activates central office translations	<ul style="list-style-type: none"> • The NNSP activates its own Central Office translations.
3. NNSP and ONSP make physical changes (where necessary)	<ul style="list-style-type: none"> • Any physical work or changes are made by either NNSP or ONSP, as necessary. • Physical changes may or may not be coordinated. Coordinated physical changes are based on inter-connection agreements between the involved service providers. • The NNSP is now providing dial-tone to ported in user
4. NNSP notifies NPAC to activate the port	<ul style="list-style-type: none"> • The NNSP sends an activate message via the SOA interface to the NPAC. • No NPAC SV may activate before the SV due date/time.
NOTE: Steps 5, 6, and 7 may be concurrent, but at a minimum should be completed ASAP.	
5. NPAC downloads (real time) to all service providers	<ul style="list-style-type: none"> • The NPAC broadcasts new SV data to all SPs in the serving area in accordance with the NANC FRS and NANC IIS. The Service Control Point (SCP) Applications and GTT Function for Number Portability requirements are defined by T1S1.6.
6. NPAC records date and time in history file	<ul style="list-style-type: none"> • The NPAC records the current date and time as the Activation Date and Time stamp, at the start of the broadcast. The Activation Complete Timestamp is based on the first LSMS that successfully acknowledged receipt of new subscription version.
7. NPAC logs failures and non-responses and notifies the NNSP and ONSP	<ul style="list-style-type: none"> • The NPAC resends the activation to a Local SMS that did not acknowledge receipt of the request, based on the retry tunable and retry interval. The number of NPAC attempts to send is a tunable parameter for which the current setting is one (1) attempt, in which case no retry attempts are performed. Once this cycle is completed NPAC personnel, when requested, investigate possible problems. In addition, the NPAC sends a notification via the SOA interface to both the NNSP and ONSP with a list of LSMSs that failed activation.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
8. All service providers update routing data (real time download)	<ul style="list-style-type: none"> This is an internal process and is performed in accordance with the Service Control Point (SCP) Applications and GTT Function for Number Portability requirements as defined by T1S1.6 (within 15 minutes).
9. ONSP removes appropriate translations	<ul style="list-style-type: none"> After update of its databases the ONSP removes translations associated with the ported TN(s). The removal of these translations (1.) will not be done until the old Service Provider has evidence that the port has occurred, or (2.) will not be scheduled earlier than 11:59 PM one day after the due date, or (3.) will be scheduled for 11:59 PM on the due date, but can be changed by an LSR supplement received no later than 9:00 PM local time on the due date. This LSR supplement must be submitted in accordance with local practices governing LSR exchange, including such communications by telephone, fax, etc. As an optional step, if the OLSP is a reseller, the ONSP should send a Loss Notification to the OLSP (indicator to stop billing).
10. NNSP may verify completion	<ul style="list-style-type: none"> The NNSP may make test calls to verify that calls to ported numbers complete as expected.
Z. End	<ul style="list-style-type: none"> Return to main flow, tie point Z, Figure 1.

Conflict Flow for the Service Creation Provisioning Process

Flow B, Figure 8

Flow Step	Description
1. Is conflict restricted?	<ul style="list-style-type: none"> • The conflict flow is entered through the Provisioning process flow (Main Flow) through tie point (B), Figure 1, when the ONSP enters a concurrence flag of “No”, and designates a conflict cause code. • Conflict is restricted (i.e., SV may not be placed into conflict by the ONSP) if one of the following: <ul style="list-style-type: none"> • The ONSP previously placed the subscription into conflict, or • The ONSP never sent a create message for this subscription, or • The request was initiated too late: <ul style="list-style-type: none"> • For wireline SPs the request was initiated after the tunable time (Conflict Restriction Window, current value of 12:00) one business day before the Due Date and T2 Timer (Final Concurrence Window tunable parameter) has expired. • For wireless SPs using short timers for this SV, the request was initiated after the T2 Timer (Final Concurrence Window tunable parameter) has expired. • If yes, go to Step 2. • If no, go to Step 3.
2. NPAC rejects the conflict request	<ul style="list-style-type: none"> • NPAC notifies SP of rejection. • The porting process resumes as normal, proceeding to the Provisioning process flow (Main Flow) at tie point BB, Figure 1.
3. NPAC changes the subscription status to conflict and notifies NNSP and ONSP	<ul style="list-style-type: none"> • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. • Both SPs take appropriate action related to internal work orders. • SVs may be modified while in the conflict state (e.g., due date), by either the NNSP or ONSP.
4. NNSP contacts ONSP to resolve conflict. If no agreement is reached, begin normal escalation	<ul style="list-style-type: none"> • The escalation process is defined in the inter-company agreements between the involved service providers.
5. Was conflict resolved within conflict expiration window?	<ul style="list-style-type: none"> • From the time an SV is placed in conflict, there is a tunable window (Conflict Expiration Window, current value of 30-calendar day limit after the due date) after which it is removed from the NPAC database. If it is resolved within the tunable window, go to Step 7; if not, the subscription request will “time out” and go to Step 6.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
6. NPAC initiates cancellation and notifies NNSP and ONSP	<ul style="list-style-type: none"> • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. • Both SPs take appropriate action related to internal work orders.
7. Was port request canceled to resolve conflict?	<ul style="list-style-type: none"> • Conflict resolution initiates one of two actions: 1) cancellation of the subscription, or 2) resumption of the service creation provisioning process. If the conflict is resolved by cancellation of the subscription, then proceed to the Cancellation Flows for Provisioning Process through tie point C, Figure 9. If the conflict is otherwise resolved, go to Step 8.
8. Was resolution message from ONSP?	<ul style="list-style-type: none"> • If yes, go to Step 9. • If no, go to Step 10.
9. NPAC notifies NNSP and ONSP of 'conflict off' via SOA	<ul style="list-style-type: none"> • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. • NPAC notifies both SPs of the change in SV status. The porting process resumes as normal, proceeding to the Provisioning process flow (Main Flow) at tie point BB, Figure 1.
10. Did NNSP send resolution message during the restriction window?	<ul style="list-style-type: none"> • If conflict was resolved within tunable business hours (current values of six hours for wireline [Long Conflict Resolution New Service Provider Restriction], and six hours for wireless [Short Conflict Resolution New Service Provider Restriction]), only the ONSP may notify NPAC of "conflict off". If conflict was resolved after tunable hours, either the NNSP or ONSP may notify NPAC of "conflict off". • In order for the porting process to continue at least one SP must remove the SV from conflict. • If yes, go to Step 11. • If no, go to Step 9.
11. NPAC rejects the conflict resolution request from NNSP	<ul style="list-style-type: none"> • NPAC sends an error to the NNSP indicating conflict resolution is not valid at this point in time.
Z. End	<ul style="list-style-type: none"> • Return to main flow, tie point Z, Figure 1.

Cancellation Flows for Provisioning Process

Cancel Flow, Figure 9

Introduction

A service order and/or subscription may be canceled through the following processes:

- The end-user contacts the NLSP or OLSP and requests cancellation of their porting request.
- Conflict Flow for the Service Creation Provisioning Process – Flow B, Figure 8: As a result of the Conflict Resolution process (at tie-point C) the NLSP and OLSP agree to cancel the SV and applicable service orders.

Flow Step	Description
1. End-user request to cancel	<ul style="list-style-type: none"> • The Cancellation Process may begin with an end-user requesting cancellation of their pending port. The Cancellation process flow applies only to that period of time between SV creation, and either activation or cancellation of the porting request. If activation completed and the end-user wishes to revert back to the former SP, it is accomplished via the Provisioning Process.
2. Did end-user contact NLSP?	<ul style="list-style-type: none"> • The end-user contacts either the NLSP or OLSP to cancel the porting request. Only the NLSP or OLSP can initiate this transaction, not another SP. • The contacted SP gathers information necessary for sending the supplemental request to the other SP noting cancellation, and for sending the cancellation request to NPAC. • If yes, go to Step 3. • If no, go to Step 7.
3. Is NLSP a Reseller?	<ul style="list-style-type: none"> • If yes, go to Step 4. • If no, go to Step 6.
4. NLSP sends cancel request to NNSP	<ul style="list-style-type: none"> • The NLSP notifies the NNSP, via their inter-company interface, indicating that the porting request is to be canceled.
5. NNSP sends SUPP to ONSP noting cancellation as soon as possible and prior to activation	<ul style="list-style-type: none"> • The NNSP fills out and sends the supplemental request form to the ONSP via their inter-company interface, indicating cancellation of the porting request.
6. NNSP sends cancel request to the NPAC	<ul style="list-style-type: none"> • The NNSP notifies the NPAC, via the SOA interface, indicating the porting request is to be canceled.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
7. OLSP obtains end-user authorization	<ul style="list-style-type: none"> The OLSP obtains actual authority from the end-user to act as the official agent on behalf of the end-user to cancel the porting request. The OLSP is responsible for demonstrating such authority as necessary.
8. Is OLSP a Reseller?	<ul style="list-style-type: none"> If yes, go to Step 9. If no, go to Step 10.
9. OLSP sends cancel request to ONSP	<ul style="list-style-type: none"> The OLSP notifies the ONSP, via their inter-company interface, indicating that the porting request is to be canceled.
10. ONSP sends cancel request to NPAC	<ul style="list-style-type: none"> The OLSP, contacted directly by the end-user or notified by the NNSP via their inter-company interface, sends a cancellation message to the ONSP, via their inter-company interface. The ONSP notifies the NPAC, via the SOA interface, indicating the porting request is to be canceled. The ONSP takes appropriate action related to internal work orders.
11. Did the provider requesting cancel send a Create message to NPAC?	<ul style="list-style-type: none"> This is the entry point from the Inter-Service Provider LNP Operations Flows – Conflict Flow, tie point C, Figure 8. This cancellation message is accepted by the NPAC only if the ONSP had previously created during the SV creation. If the ONSP does not send a create message to the NPAC for this SV, it cannot subsequently send a cancellation message. If yes, go to Step 13. If no, go to Step 12.
12. NPAC rejects the cancel request	<ul style="list-style-type: none"> NPAC sends an error via the SOA interface indicating that a cancel request cannot be sent for an SV that did not have a matching create from that SP.
13. Did both NNSP and ONSP send Create message to NPAC?	<ul style="list-style-type: none"> The NPAC tests for receipt of cancellation messages from the two SPs based on which SP had previously sent a message into the NPAC. Since the ONSP create is optional for SV creation, if the ONSP did not send a message during the creation process, the ONSP input during cancellation is not accepted by the NPAC. Similarly, if during the SV creation process only the ONSP sent a message, and not the NNSP, only the ONSP input is accepted when canceling an order. If yes, go to Step 15. If no, go to Step 14.
14. NPAC updates subscription to cancel, logs status change, and notifies NNSP and ONSP	<ul style="list-style-type: none"> For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. For a “non-concurred” SV, when the first cancellation message is received, the NPAC sets the SV status directly to <i>cancel</i>, and proceeds to tie point Z. Both NNSP and ONSP are notified of this change in status via the SOA interface.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
15. NPAC updates subscription to cancel-pending, logs status change, and notifies NNSP and ONSP	<ul style="list-style-type: none"> • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. • For a “concurrent” SV, when the first cancellation message is received, the NPAC sets the SV status to <i>cancel-pending</i>. Both NNSP and ONSP are notified of this change in status via the SOA interface.
16. Did NNSP send cancel to NPAC?	<ul style="list-style-type: none"> • If yes, go to Step 17. • If no, go to Step 21.
17. Did NPAC receive cancel ACK from ONSP within first cancel window timer?	<ul style="list-style-type: none"> • The NPAC applies a nine (9)-business hour [tunable parameter] time limit on receiving cancellation acknowledgment messages from both SPs. This is referred to as the Cancellation-Initial Concurrence Window. The ACK is optional for the SP that initiated the cancel request. • NPAC timers include business hours only, except where otherwise specified. Short business hours are defined as 7a-7p CT (business day start at 13:00/12:00 GMT, duration of 12 hours). Long business hours are planned for 9a-9p in the predominant time zone for each NPAC region (business day start – NE/MA/SE 14:00/13:00 GMT, MW/SW/Canadian 15:00/14:00 GMT, WE 16:00/15:00 GMT, WC 17:00/16:00 GMT, duration of 12 hours). Short Business Days are currently defined as Monday through Friday, except holidays, and Long Business Days are currently defined as Sunday through Saturday (seven days a week), except holidays. Holidays and business hours are defined for each NPAC Region. • If yes, go to Step 20. • If no, go to Step 18.
18. NPAC notifies ONSP that cancel ACK is missing	<ul style="list-style-type: none"> • The Cancellation-Initial Concurrence Window starts with receipt of the first cancellation message at NPAC. When this timer expires, the NPAC requests the missing information from ONSP via the SOA interface. Only “concurrent” subscriptions reach this point in the process flow.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
19. NPAC waits for either cancel ACK from ONSP or expiration of second cancel window timer	<ul style="list-style-type: none"> • The NPAC applies an additional nine (9) business hour [tunable parameter] time limit on receiving cancellation acknowledgment messages from both Service Providers. This is referred to as the Cancellation-Final Concurrence Window. The ACK is optional for the SP that initiated the cancel request. • NPAC SMS processing timers include business hours only, except where otherwise specified. Short business hours are defined as 7a-7p CST (business day start at 13:00 GMT, duration of 12 hours). Long business hours are planned for 9a-9p in the predominant time zone for each NPAC region (business day start – NE/MA/SE 8a-8p CST, MW/SW 9a-9p CST, WE 10a-10p CST, WC 11a-11p CST, duration of 12 hours). Short Business Days are currently defined as Monday through Friday, except holidays, and Long Business Days are currently defined as Sunday through Saturday (seven days a week), except holidays. Holidays and business hours are defined for each NPAC Region. • Either upon receipt of the concurring ACK notification or the expiration of the second cancel window timer, go to Step 20.
20. NPAC updates subscription to cancel, logs cancel and notifies NNSP and ONSP	<ul style="list-style-type: none"> • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. • The porting request is canceled by changing the subscription status to <i>canceled</i>. Both Service Providers are notified of the cancellation via the SOA interface.
21. Did NPAC receive cancel ACK from NNSP within first cancel window?	<ul style="list-style-type: none"> • The NPAC applies a nine (9)-business hour [tunable parameter] time limit on receiving cancellation acknowledgment messages from both SPs. This is referred to as the Cancellation-Initial Concurrence Window. The ACK is optional for the SP that initiated the cancel request. • NPAC timers include business hours only, except where otherwise specified. Short business hours are defined as 7a-7p CT (business day start at 13:00/12:00 GMT, duration of 12 hours). Long business hours are planned for 9a-9p in the predominant time zone for each NPAC region (business day start – NE/MA/SE 14:00/13:00 GMT, MW/SW/Canadian 15:00/14:00 GMT, WE 16:00/15:00 GMT, WC 17:00/16:00 GMT, duration of 12 hours). Short Business Days are currently defined as Monday through Friday, except holidays, and Long Business Days are currently defined as Sunday through Saturday (seven days a week), except holidays. Holidays and business hours are defined for each NPAC Region. • If yes, go to Step 20. • If no, go to Step 22.
22. NPAC notifies NNSP that cancel ACK is missing	<ul style="list-style-type: none"> • The Cancellation-Initial Concurrence Window starts with receipt of the first cancellation message at NPAC. When this timer expires, the NPAC requests the missing information from NNSP via the SOA interface. Only “concurrent” subscriptions reach this point in the process flow.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
23. Did NPAC receive cancel ACK from NNSP within second cancel window timer?	<ul style="list-style-type: none"> • The NPAC applies an additional nine (9)-business hour [tunable parameter] time limit on receiving cancellation acknowledgment messages from both SPs. This is referred to as the Cancellation-Final Concurrence Window. The ACK is optional for the SP that initiated the cancel request. • NPAC timers include business hours only, except where otherwise specified. Short business hours are defined as 7a-7p CT (business day start at 13:00/12:00 GMT, duration of 12 hours). Long business hours are planned for 9a-9p in the predominant time zone for each NPAC region (business day start – NE/MA/SE 14:00/13:00 GMT, MW/SW/Canadian 15:00/14:00 GMT, WE 16:00/15:00 GMT, WC 17:00/16:00 GMT, duration of 12 hours). Short Business Days are currently defined as Monday through Friday, except holidays, and Long Business Days are currently defined as Sunday through Saturday (seven days a week), except holidays. Holidays and business hours are defined for each NPAC Region. • If yes, go to Step 20. • If no notification is received prior to second cancel window timer expiration, proceed to tie-point CC, “Cancellation Conflict Process Flow”, Figure 10.
Z. End	<ul style="list-style-type: none"> • Return to main flow, tie point Z, Figure 1.

Cancellation Conflict Flow for Provisioning Process

Cancel-Conflict Flow due to missing Cancellation ACK from New SP,
Figure 10

Flow Step	Description
Note that the Cancellation Conflict process flow is reached only for “concurrent” subscriptions.	
1. NPAC updates subscription to conflict, logs conflict, and notifies NNSP and ONSP	<ul style="list-style-type: none"> • This is the entry point from the Inter-Service Provider LNP Operations Flows – Cancellation Flow, tie point CC, Figure 9. • If the NNSP does not provide a cancellation notification message to NPAC, in spite of a Cancellation LSR from the ONSP and a reminder message from NPAC, the subscription is placed in a <i>conflict</i> state. NPAC also writes the proper conflict cause code to the subscription record, and notifies both SPs, with proper conflict cause code, of the change in status via the SOA interface. • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. • Both SPs take appropriate action related to internal work orders.
2. Did NPAC receive cancel message from NNSP?	<ul style="list-style-type: none"> • Only “missing cancellation ACK from New SP” subscriptions reach this point in the process flow. The subscription will transition to pending or cancel. • With the subscription in <i>conflict</i>, it is only the NNSP who controls the transaction. The NNSP makes a concerted effort to contact the ONSP prior to proceeding. • If yes, go to Step 3. • If no, go to Step 5.
3. NNSP notifies NPAC to cancel subscription	<ul style="list-style-type: none"> • The NNSP may decide to cancel the subscription. If so, they notify NPAC of this decision via the SOA interface.
4. NPAC updates subscription to cancel, logs cancel, and notifies NNSP and ONSP	<ul style="list-style-type: none"> • Following notification by the NNSP to cancel the subscription, NPAC logs this information, and changes the subscription status to <i>cancel</i>. Both SPs are notified of the change in the subscription status via the SOA interface. • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. • Both SPs take appropriate action related to internal work orders.
5. Has conflict expiration window expired?	<ul style="list-style-type: none"> • At this point in the process flow, the subscription status is <i>conflict</i>, and is awaiting conflict resolution or the expiration of the tunable window (Conflict Expiration Window, current value of 30 days). • If yes, go to Step 6. • If no, go to Step 7.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
6. NPAC updates subscription to cancel, logs cancel, and notifies NNSP and ONSP	<ul style="list-style-type: none"> • After no response from the NNSP for 30 calendar days regarding this particular subscription, NPAC changes the status to <i>canceled</i> and notifies both SPs of the change in status via the SOA interface. • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. • Both SPs take appropriate action related to internal work orders.
7. Did NPAC receive resolve conflict message from NNSP	<ul style="list-style-type: none"> • The NNSP may choose to proceed with the porting process, in spite of a cancellation message from the ONSP. As both SPs are presumably basing their actions on the end-user's request, and each is apparently getting a different request from that end-user, each should ensure the accuracy of the request. • If the NNSP decides to proceed with the porting, they send a resolved conflict message via the SOA interface. • It is the responsibility of the NNSP to contact the ONSP, to request that related work orders which support the porting process are performed. The ONSP must support the porting process. • If yes, go to Step 8. • If no, return to Step 2.
8. Has NNSP conflict resolution restriction expired?	<ul style="list-style-type: none"> • At this point in the process flow, the subscription status is <i>conflict</i>, and is awaiting conflict resolution or the expiration of the tunable window (current values of six hours for wireline [Long Conflict Resolution New Service Provider Restriction], and six hours for wireless [Short Conflict Resolution New Service Provider Restriction]). • The conflict resolution restriction window is only applicable the first time a subscription is placed into conflict, whether the conflict is invoked by the NPAC due to this process, or placed into conflict by the ONSP. • If yes, go to Step 9. • If no, go to Step 10.
9. NPAC notifies NNSP and ONSP of 'conflict off' via SOA	<ul style="list-style-type: none"> • For the notification process, refer to Inter-Service Provider LNP Operations Flows – Reseller Notification, Figure 5. • NPAC notifies both SPs of the change in subscription status. The porting process resumes as normal, at tie-point BB, Figure 1.
10. NPAC rejects the resolve conflict request from NNSP	<ul style="list-style-type: none"> • The NNSP has sent the resolve conflict message before the expiration of the conflict resolution restriction window. NPAC returns an error message back via the SOA interface.
Z. End	<ul style="list-style-type: none"> • Return to main flow, tie point Z, Figure 1.

Inter-Service Provider LNP Operations Flows - Narratives

Disconnect Process for Ported TN(s)

Disconnect Flow, Figure 11

Flow Step	Description
1. End-user initiates disconnect	<ul style="list-style-type: none"> The end-user provides disconnect date and negotiates intercept treatment with current SP.
2. Is NLSP a reseller?	<ul style="list-style-type: none"> If yes, go to Step 3. If no, go to Step 4.
3. NLSP sends disconnect request to NNSP	<ul style="list-style-type: none"> Current Local SP sends disconnect request to current Network SP, per inter-company processes.
4. NNSP initiates disconnect	<ul style="list-style-type: none"> NNSP initiates disconnect of service based on request from NLSP or end-user. NNSP initiates disconnect of service based on regulatory authority(s).
5. NNSP arranges intercept treatment when applicable	<ul style="list-style-type: none"> NNSP arranges intercept treatment as negotiated with the end user, or, when the disconnect is SP initiated, per internal processes.
6. NNSP creates and processes service order	<ul style="list-style-type: none"> NNSP follows existing internal process flows to ensure the disconnect within its own systems.
7. NNSP notifies NPAC of disconnect date ¹ and indicates effective release date ²	<ul style="list-style-type: none"> NNSP notifies NPAC of disconnect date via the SOA interface and indicates effective release date, which defines when the broadcast occurs. If no effective release date is given, the broadcast from the NPAC is immediate. The maximum interval between disconnect date and effective release date is 18 months.
8. Has effective release date been reached?	<ul style="list-style-type: none"> If yes, go to Step 9. If no, repeat Step 8.
9. NPAC broadcasts subscription deletion to all applicable SPs	<ul style="list-style-type: none"> On effective release date, the NPAC broadcasts SV deletion to all applicable SPs via the LSMS interface.
10. NPAC notifies code/block holder of disconnected TN(s) disconnect and release dates	<ul style="list-style-type: none"> On effective release date, the NPAC notifies code/block holder of the disconnected TN(s), effective release and disconnect dates via the SOA interface.

¹ Disconnect Date: Date the telephone number or numbers are no longer associated between an end user and the current Service Provider.

² Effective Release Date: Date the telephone number reverts back to NPA/NXX holder/owner.

Inter-Service Provider LNP Operations Flows - Narratives

Flow Step	Description
11. NPAC deletes TN(s) from active database	<ul style="list-style-type: none">• On effective release date, the NPAC removes telephone number from NPAC database.
12. End	

¹ Disconnect Date: Date the telephone number or numbers are no longer associated between an end user and the current Service Provider.

² Effective Release Date: Date the telephone number reverts back to NPA/NXX holder/owner.

Inter-Service Provider LNP Operations Flows - Narratives

Audit Process

Audit Flow, Figure 12

<u>Flow Step</u>	<u>Description</u>
1. Service Provider requests an audit from NPAC	<ul style="list-style-type: none"> • An SP may request an audit to assist in resolution of a repair problem reported by an end-user. Prior to the audit request, the SP completes internal analysis as defined by company procedures and, if another SP is involved, attempts to jointly resolve the trouble in accordance with inter-company agreements between the involved service providers. Failing to resolve the trouble following these activities, the SP requests an audit.
2. NPAC issues queries to appropriate LSMSs	<ul style="list-style-type: none"> • The NPAC issues queries to the LSMSs involved in the customer port.
3. NPAC compares own subscription version to LSMS subscription version	<ul style="list-style-type: none"> • Upon receipt of the LSMS subscription version, the comparison of the NPAC and LSMS subscription versions is made to determine if there are discrepancies between the two databases. • If an LSMS does not respond, it is excluded from the audit.
4. NPAC downloads updates to LSMSs with subscription version differences	<ul style="list-style-type: none"> • If inaccurate routing data is found, the NPAC broadcasts the correct subscription version data to any involved SPs networks to correct inaccuracies.
5. Are all audits completed?	<ul style="list-style-type: none"> • If yes, go to Step 6. • If no, return to Step 4.
6. NPAC reports audit completion and discrepancies to requestor	<ul style="list-style-type: none"> • The NPAC reports to the requesting SP following completion of the audit to allow the SP to close the trouble ticket. • Upon request, the NPAC provides ad hoc reports to SPs that wish to determine which SPs are launching audit queries to their LSMS.
7. End	

Inter-Service Provider LNP Operations Flows - Narratives

Code Opening Processes

NPA-NXX Code Opening, Figure 13

Flow Step	Description
1. NPA-NXX holder notifies NPAC of NPA-NXX Code(s) being opened for porting	<ul style="list-style-type: none">• The SP responsible for the NPA-NXX being opened must notify the NPAC via the SOA or LSMS interface within a regionally agreed upon time frame.• In the case of numbers that use a Type 1 wireless interconnection, the corresponding NPA-NXX needs to be opened by the Old Wireline SP.
2. NPAC updates its NPA-NXX database	<ul style="list-style-type: none">• The NPAC updates its databases to indicate that the NPA-NXX has been opened for porting.
3. NPAC sends notice of code opening to all SPs	<ul style="list-style-type: none">• The NPAC provides advance notice via the object creation message of the scheduled opening of NPA-NXX code(s) via the SOA and LSMS interface. Currently the NPAC vendor is also posting the NPA-NXX openings to the secure website.
4. End	

Inter-Service Provider LNP Operations Flows - Narratives

Code Opening Processes

First TN Ported in NPA-NXX, Figure 14

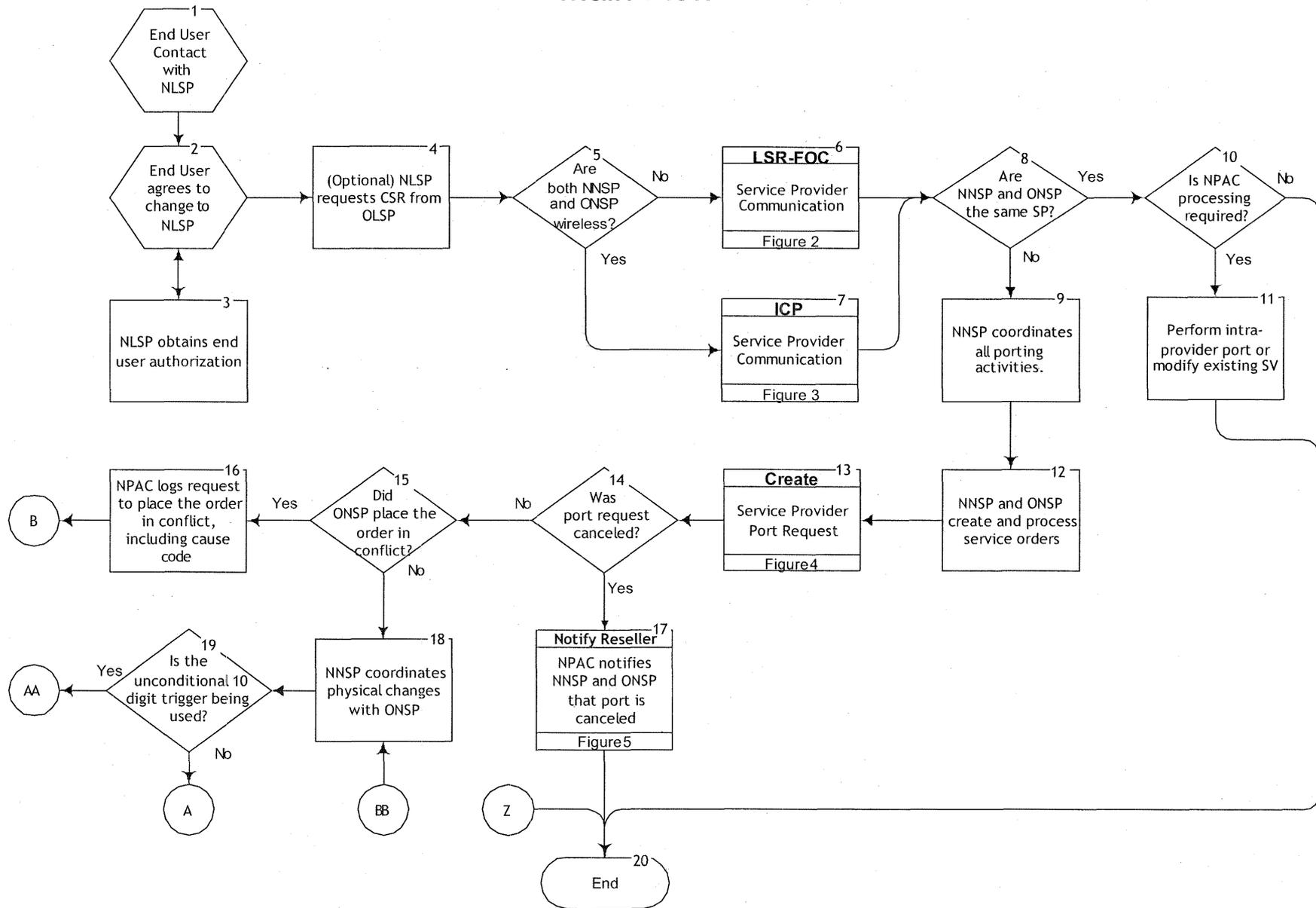
Flow Step	Description
1. NPAC successfully processes create request for TN subscription version	<ul style="list-style-type: none">• SP notifies the NPAC of SV creation for a TN in an NPA-NXX.
2. NPAC successfully processes create request for NPA-NXX-X	<ul style="list-style-type: none">• NPAC successfully processes an NPA-NXX-X for a Number Pool Block.
3. First SV activity in NPA-NXX?	<ul style="list-style-type: none">• If yes, go to Step 4.• If no, go to Step 5.
4. NPAC sends notification of first TN ported to all SPs via SOA and LSMS	<ul style="list-style-type: none">• When the NPAC receives the first SV create request in an NPA-NXX, it will broadcast a “heads-up” notification to all SPs via the SOA and LSMS interfaces. Upon receipt of the NPAC message, all SPs, within five (5) business days, will complete the opening for the NPA-NXX code for porting in all switches.
5. End	

Inter-Service Provider LNP Operations Flows - Narratives

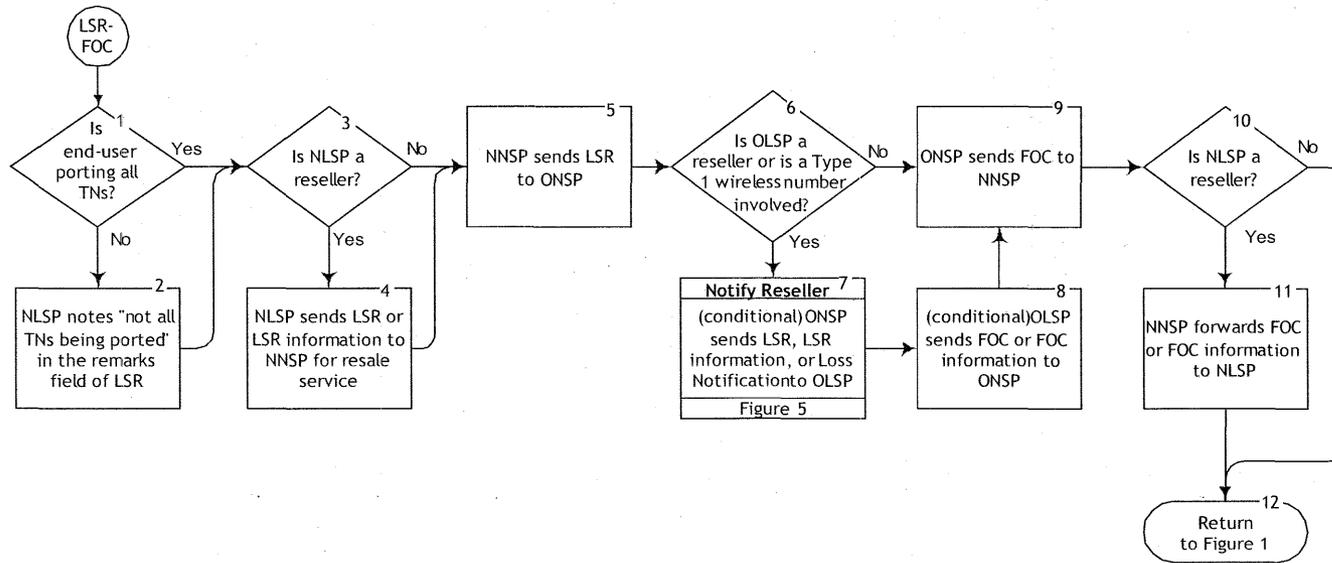
Tunable Name	Current Tunable Value
T1, Short Initial Concurrence Window	1 hour
T1, Long Initial Concurrence Window	9 hours
T2, Short Final Concurrence Window	1 hour
T2, Long Final Concurrence Window	9 hours
Conflict Restriction Window	12:00pm (noon)
Conflict Expiration Window	30 days
Long Conflict Resolution New Service Provider Restriction	6 hours
Short Conflict Resolution New Service Provider Restriction	6 hours
Long Cancellation-Initial Concurrence Window	9 hours
Short Cancellation-Initial Concurrence Window	9 hours
Long Cancellation-Final Concurrence Window	9 hours
Short Cancellation-Final Concurrence Window	9 hours

Inter-Service Provider LNP Operations Flows

- Main Flow -

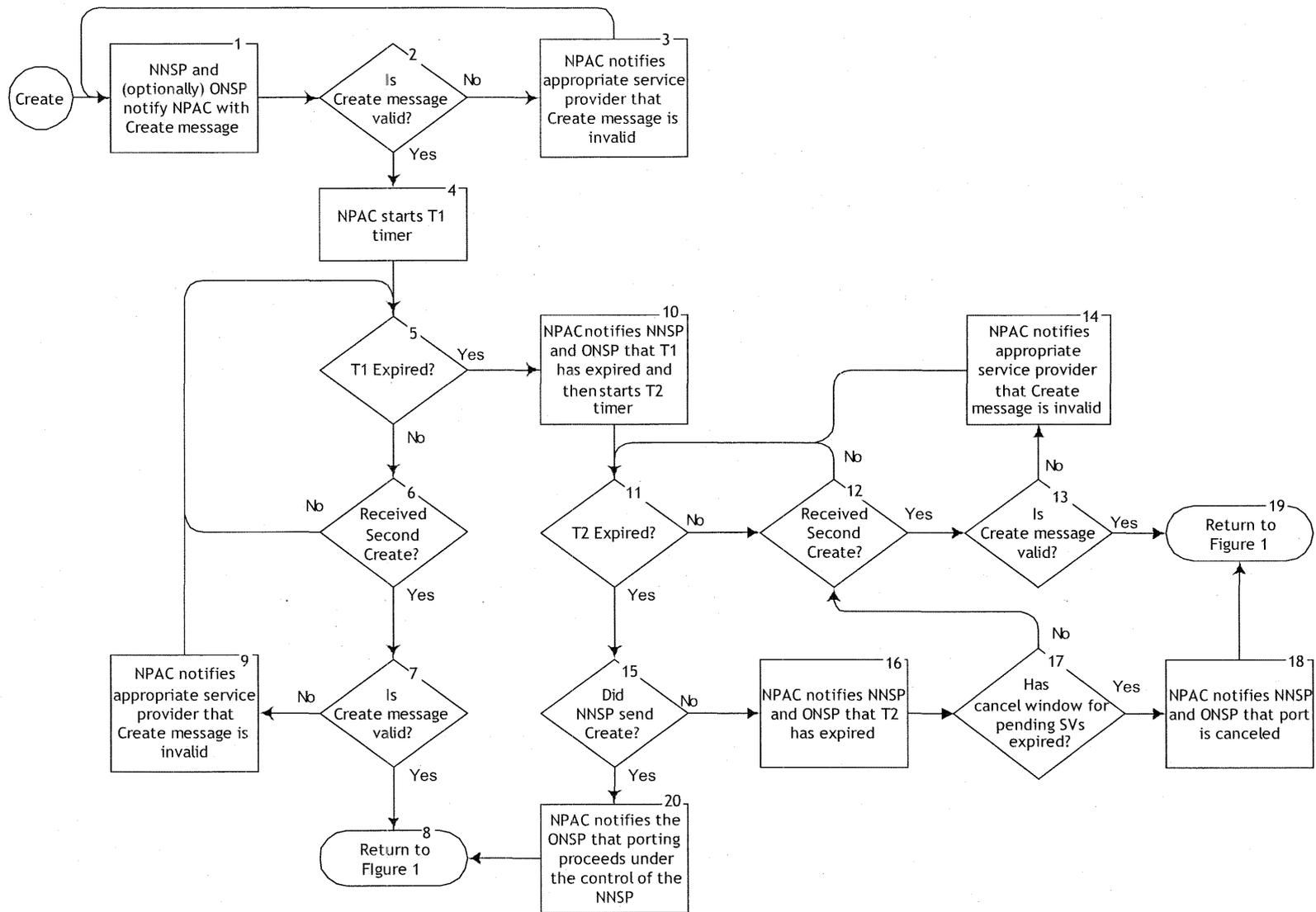


Inter-Service Provider LNP Operations Flows - Wireline LSR/FOC Process -

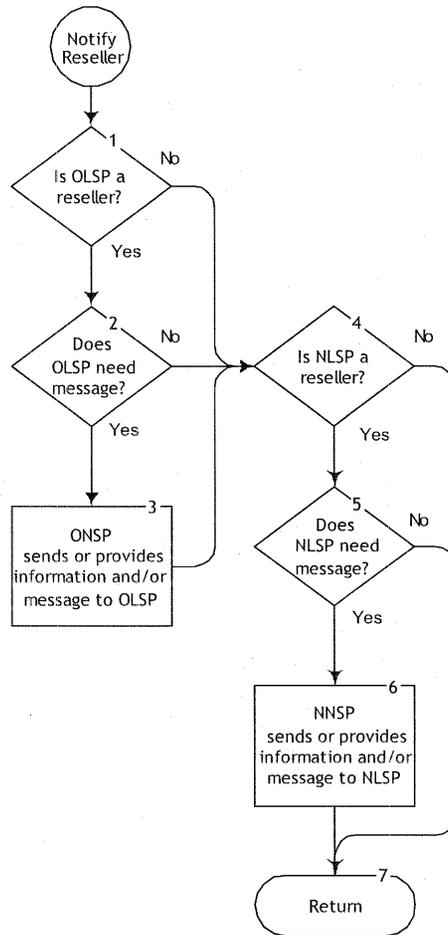


Inter-Service Provider LNP Operations Flows

- Subscription Version Create Flow -

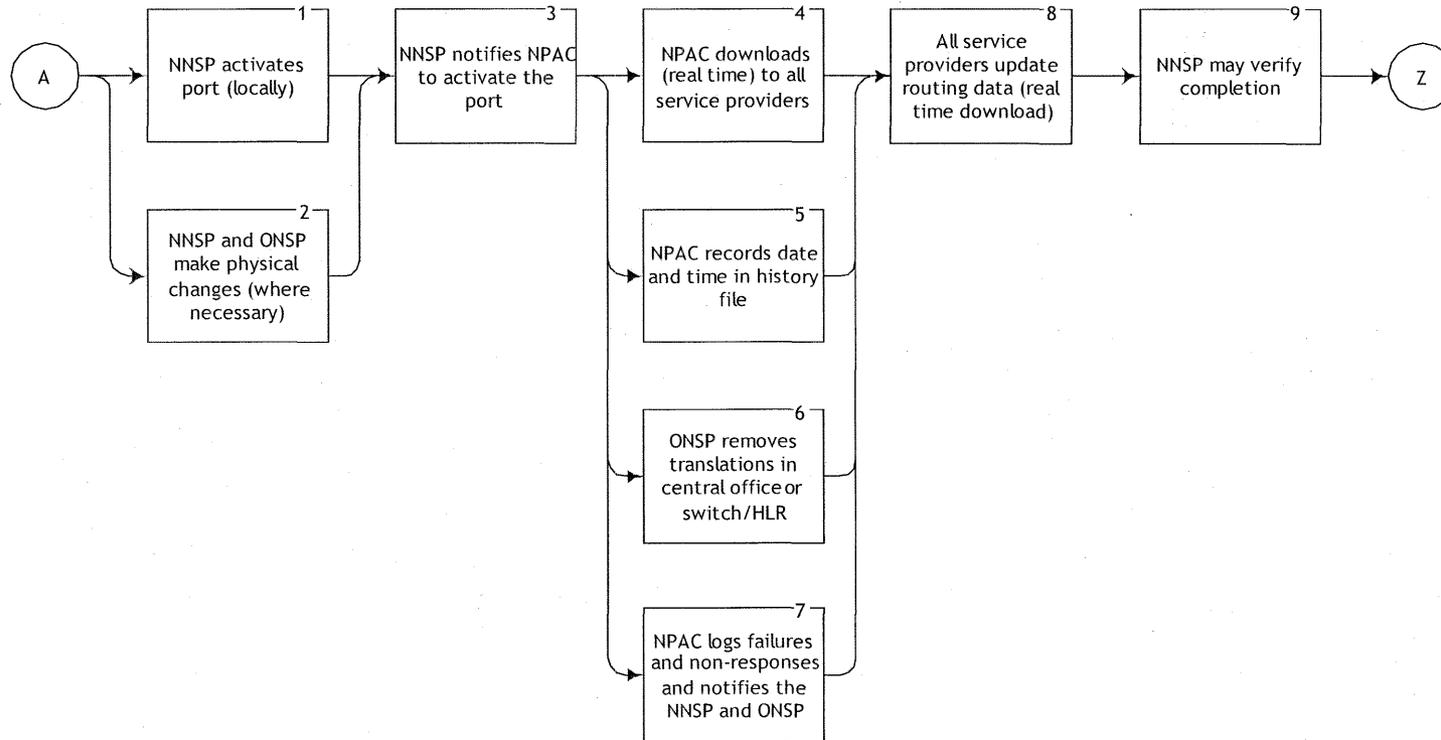


Inter-Service Provider LNP Operations Flows - Reseller Notification -



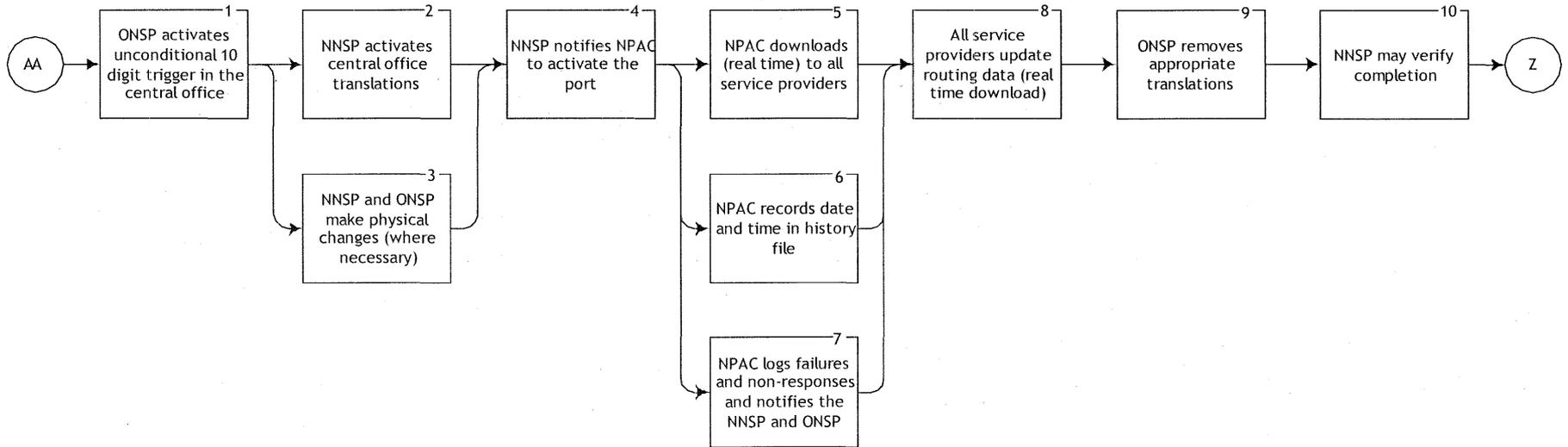
Inter-Service Provider LNP Operations Flows

- Provisioning Without Unconditional 10-Digit Trigger -



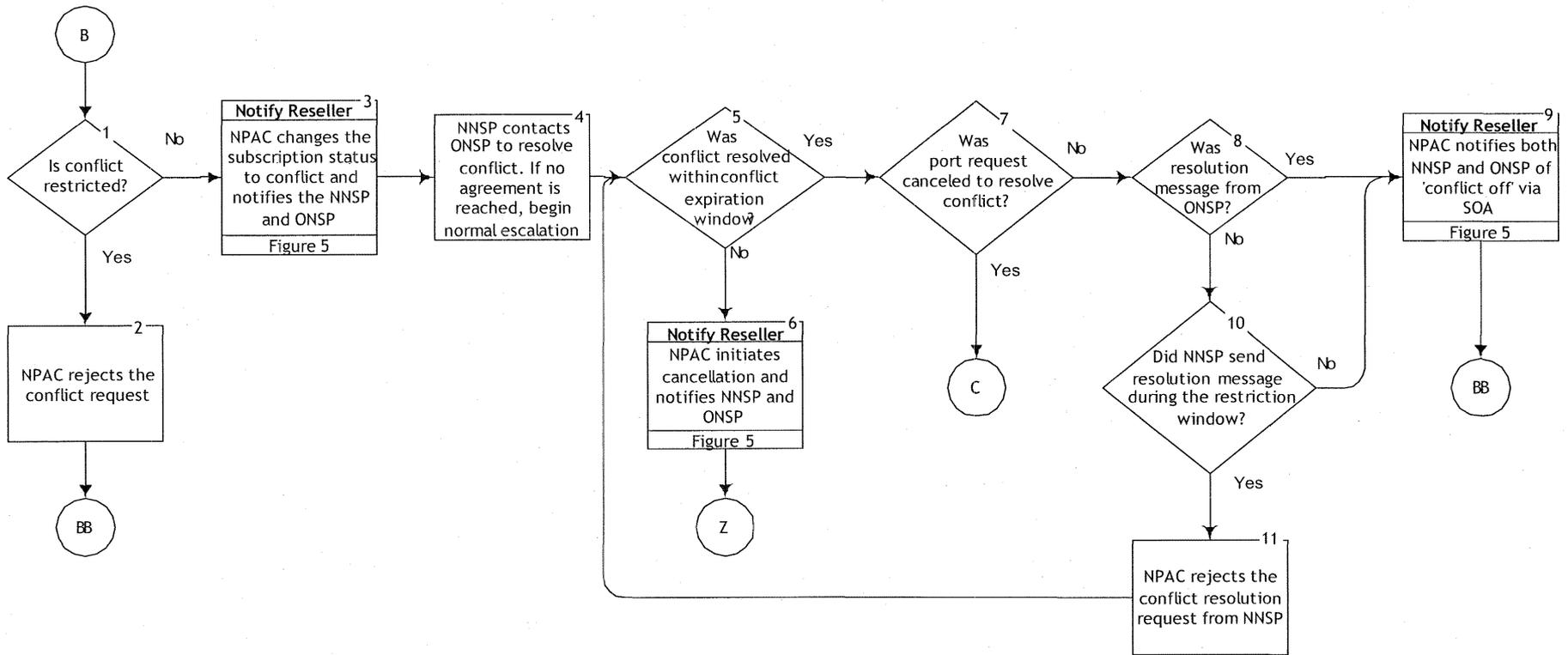
Inter-Service Provider LNP Operations Flows

- Provisioning With Unconditional 10-Digit Trigger -



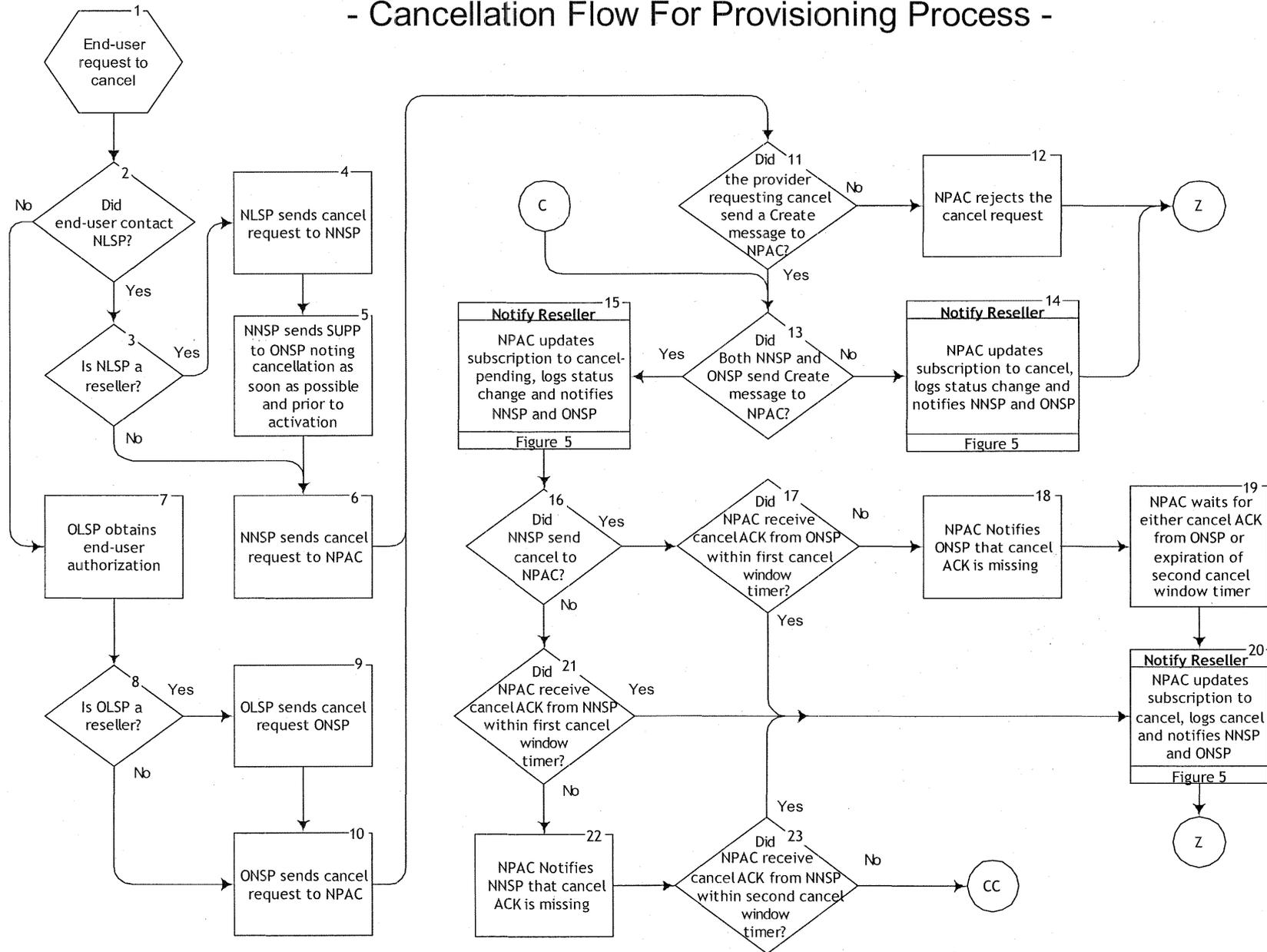
Inter-Service Provider LNP Operations Flows

- Conflict Flow For The Service Creation Provisioning Process -



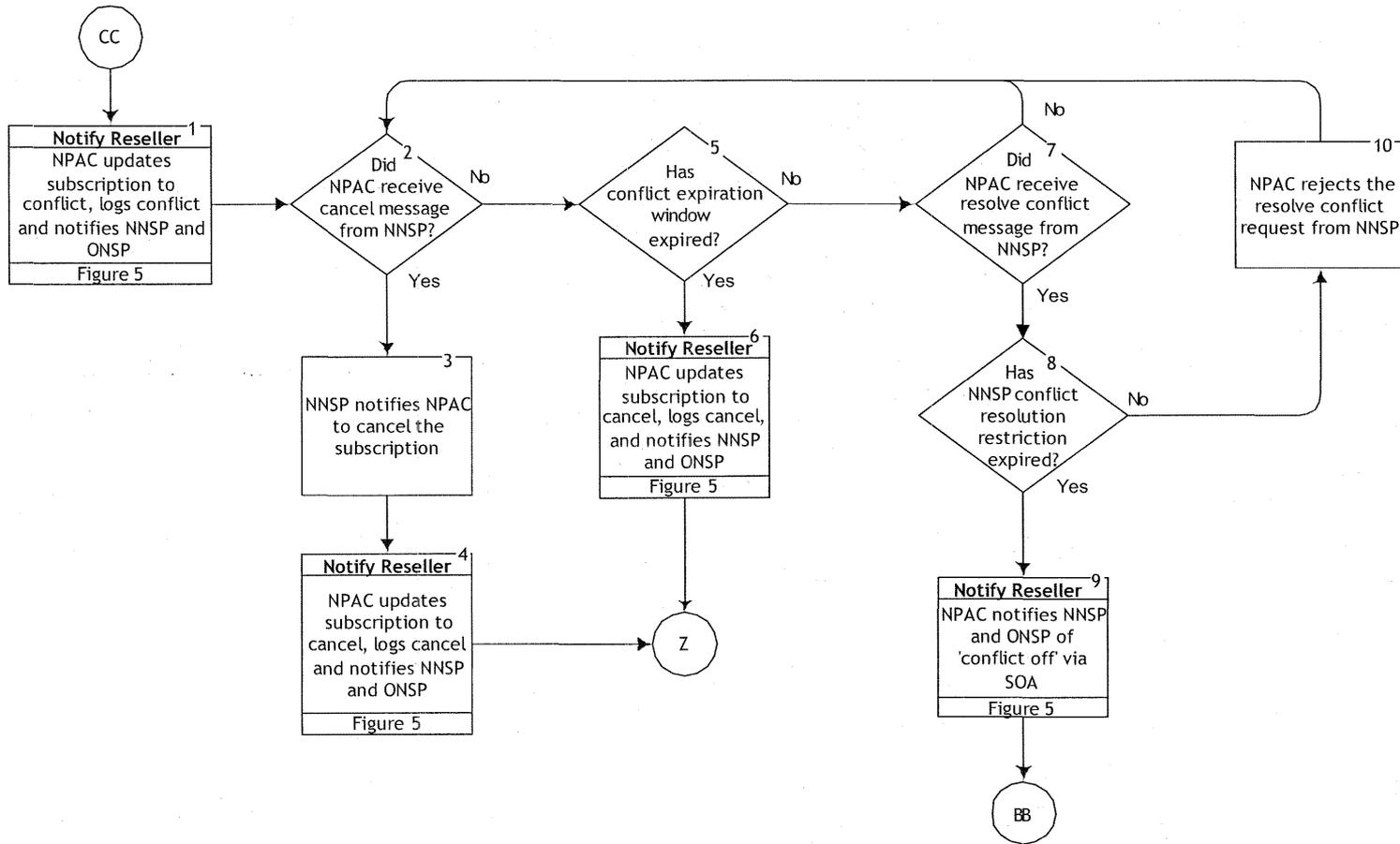
Inter-Service Provider LNP Operations Flows

- Cancellation Flow For Provisioning Process -



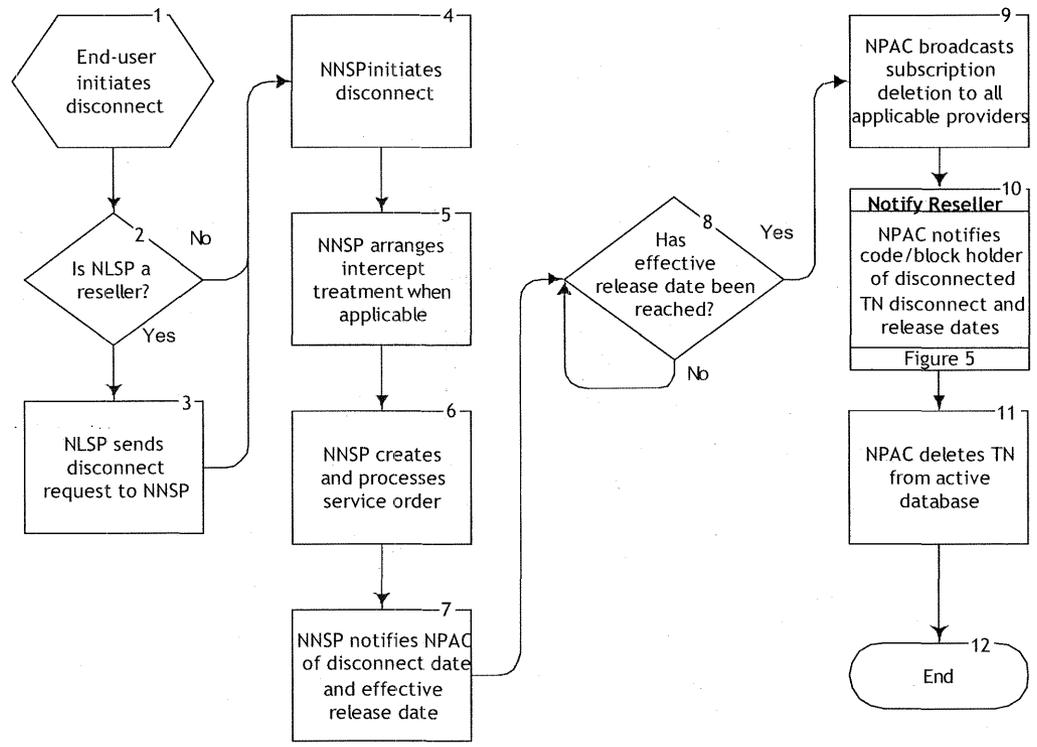
Inter-Service Provider LNP Operations Flows

- Cancellation Ack Missing from New Provider Provisioning Process -

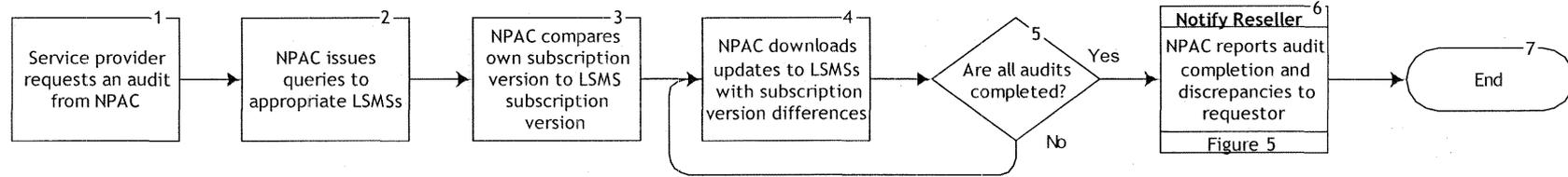


Inter-Service Provider LNP Operations Flows

- Disconnect Process For Ported Telephone Numbers -



Inter-Service Provider LNP Operations Flows - Audit Process -



Inter-Service Provider LNP Operations Flows - Code Opening Process -

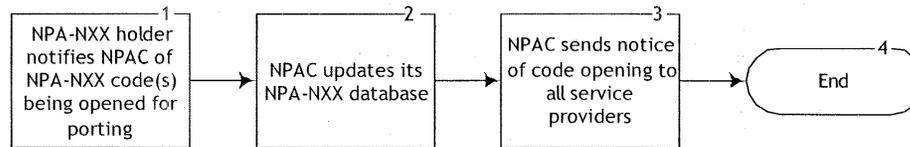


Figure 13

- First TN Ported in NPA-NXX -

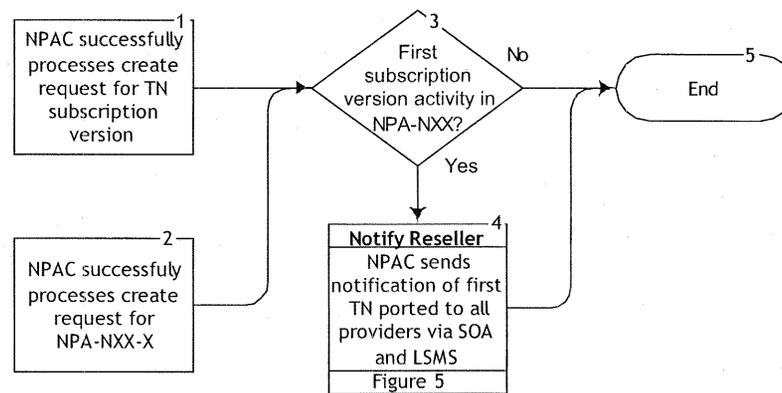


Figure 14

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **OPPOSITION OF QWEST TO PETITION FOR DECLARATORY RULING** to be 1) filed with the FCC via its Electronic Comment Filing System in CC Docket No. 95-116, 2) served via e-mail on Ms. Janice M. Myles, Wireline Competition Bureau, Competition Policy Division at janice.myles@fcc.gov, and 3) served via e-mail on the FCC's duplicating contractor Best Copy and Printing, Inc. at fcc@bcpiweb.com.

Richard Grozier
Richard Grozier

February 8, 2007