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February 8, 2007

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

FILED/ACCEPTED

FEB - 8 2007

Federal Communications Commission
Office of the Secretary

RE : Telephone Number Portability, CC Docket No. 95-116

Dear Ms. Dortch:

Enclosed for filing please find Verizon's Opposition to T-Mobile USA, Inc and Sprint Nextel's Petition for Declaratory Ruling Regarding Number Portability in the above referenced docket. Some of the materials in this filing contain confidential information. We are filing two copies of the public version of the filing and one copy of those portions of the filing that are confidential. In addition, we are serving the appropriate FCC staff with both public and confidential versions.

Please date-stamp the extra copy of this letter and return it to the individual delivering this package.

All inquiries relating to access to any confidential information submitted in this filing should be addressed to the undersigned.

Thank you for your assistance in this matter.

Sincerely,

Joshua E. Swift

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Enclosures

cc: Margaret Dailey
Deena Shetler

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEB - 8 2007

Federal Communications Commission
Office of the Secretary

In the Matter of

Telephone Number Portability

CC Docket No. 95-116

**VERIZON'S OPPOSITION TO T-MOBILE USA, INC. AND SPRINT NEXTEL'S
PETITION FOR DECLARATORY RULING REGARDING NUMBER PORTABILITY**

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Telephone Number Portability

CC Docket No. 95-116

**VERIZON'S¹ OPPOSITION TO T-MOBILE USA, INC. AND SPRINT NEXTEL'S
PETITION FOR DECLARATORY RULING REGARDING NUMBER PORTABILITY**

Introduction and Summary

The Petition for Declaratory Ruling filed by T-Mobile USA, Inc. and Sprint Nextel Corporation ("T-Mobile/Sprint Petition") should be addressed by the Commission as part of its Second Further Notice of Proposed Rulemaking ("Second Notice") in this docket. Their Petition raises the very same issues concerning the format for submitting intermodal number portability requests that these same two wireless carriers raised in their comments in this docket.

The Commission should not regulate the form used for number portability requests. The industry has developed number portability processes and systems that work for both intermodal and intramodal portability requests. As Verizon's performance results demonstrate, nearly all number portability requests are completed on time, and only a small fraction of those requests are rejected or cancelled.

¹ The Verizon companies participating in this filing ("Verizon") are the regulated, wholly owned subsidiaries of Verizon Communications, Inc.

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Moreover, Verizon is continuing to work with industry groups to improve number portability processes and systems, including the Local Number Portability Administration (“LNPA”) Working Group, the LNPA Pre-Port Subcommittee, the Ordering and Billing Forum (“OBF”) Wireless Committee, the OBF Local Service Ordering and Provisioning Committee and the OBF Intermodal Subcommittee. These efforts have improved number portability processes and systems and reduced the number of portability requests that have to be resubmitted by wireless carriers. The Commission should allow these industry efforts to continue without regulatory interference.

I. The Commission Should Address the T-Mobile/Sprint Petition as Part of the Commission’s Pending Second Further Notice of Proposed Rulemaking in this Docket.

The issues raised in the T-Mobile/Sprint Petition have been raised before. They are the same issues that were raised by these parties in comments and reply comments filed in response to the Commission’s Second Notice in this docket. The T-Mobile/Sprint Petition should therefore be folded into the Commission’s consideration of that Second Notice.

In comments filed on the Second Notice, T-Mobile asked the Commission to “require all carriers to use a single, streamlined port request format that contains only the minimum amount of information necessary to validate and process the consumer’s port request.” T-Mobile Comments at 1. Similarly, Sprint “encourage[d] the Commission both to standardize and to simply [sic] the validation fields with simple intermodal port requests.” Sprint Comments at 9.

These wireless carriers have repeated these comments in their Petition for Declaratory Ruling. There is no reason for the Commission to address their Petition separately from the Commission’s consideration of its Second Notice in this docket. As explained below, there is also no reason for the Commission to grant the relief they request.

II. The Commission Should Not Adopt Rules on the Forms Used for Intermodal Porting Requests.

The industry has developed and implemented porting processes and systems that work. Verizon uses essentially the same porting processes and systems for intramodal ports and intermodal ports.² Since November 2003, when wireless number portability was implemented, all carriers – both wireline and wireless – have performed a total of approximately 80 million inter-service provider ports. *See* Decl. of Gary Sacra ¶¶ 3-5 (“Sacra Decl.”).

Verizon has continued to work with the industry to make improvements to its porting processes and systems. As the industry has improved porting processes and systems, the number of intermodal porting complaints has declined. In 2004, there were 255 intermodal porting complaints involving Verizon (former Bell Atlantic and GTE entities) filed with the FCC. Two years later, in 2006, there were only 9 such intermodal complaints. Decl. of Kim M. Brown ¶ 3.

The experience of two wireless carriers in submitting porting requests does not justify any change to the industry’s porting processes and systems. Verizon’s performance results demonstrate that Verizon is completing nearly all porting requests on time and that the vast majority of carriers are able to submit nearly all of their porting requests without rejection or cancellation. There is no reason why T-Mobile and Sprint could not submit nearly all of their porting requests without rejection or cancellation.

² The principal difference between an intramodal port and an intermodal port involves the handling of E-911 records. Each wireline customer has a unique record in the E-911 database because his location is fixed. Wireless customers do not have individual records in the E-911 database because their location is not fixed. When Verizon processes an intramodal port, Verizon unlocks the end user’s E-911 database record so that the new local service provider can modify and lock the record. When Verizon processes an intermodal port, Verizon deletes the end user’s E-911 database record. This difference does not affect the interval for completing number porting requests.

A. Verizon's Number Portability Performance Continues to be Excellent.

Verizon's performance on both intramodal and intermodal porting requests continues to be excellent. Verizon is completing nearly all porting requests on time. In addition, virtually all number portability requests flow through Verizon's ordering and provisioning systems, and only a small fraction of porting requests are rejected or cancelled.

First, Verizon has completed nearly all porting requests on time. In 2006, Verizon's publicly filed performance reports showed that Verizon completed more than 0.9 million intramodal and intermodal porting requests. *See* Decl. of Julie A. Canny ("Canny Decl.") ¶ 4. Over 99.5 percent of these porting requests were completed on time. *Id.* For the last six months of 2006, over **[Begin Proprietary]** **[End Proprietary]** percent of the porting requests submitted by T-Mobile and Sprint were completed on time. *Id.* ¶ 9.

Second, nearly all of these number portability requests flowed through Verizon's ordering and provisioning systems on a mechanized basis without manual intervention. For example, in December 2006, Verizon's flow through rate for number portability orders submitted in Verizon East states³ was over 91 percent. *Id.* ¶ 6. Verizon's flow through rate for T-Mobile's number portability requests submitted that same month in Verizon East states was **[Begin Proprietary]** **[End Proprietary]** percent and for Sprint's requests was **[Begin Proprietary]** **[End Proprietary]** percent. *Id.* ¶ 9.

Third, only a small fraction of number portability requests are rejected by Verizon's systems. In December 2006, Verizon's reject rate for number portability requests submitted in Verizon East states was only 6.7 percent. *Id.* ¶ 7.

³ The Verizon East states include the former Bell Atlantic service territories and the former GTE service territories in Virginia. Comparable data were not available for other states because performance reporting requirements are not uniform in those states.

Fourth, very few number portability requests are cancelled by carriers. In December 2006, the cancellation rate for number portability requests submitted in Verizon East states was only 3.6 percent. *Id.* ¶ 8.

These performance results demonstrate that, on the whole, porting requests are completed in a timely fashion and are rarely rejected or cancelled. Because the vast majority of carriers are able to submit nearly all of their porting requests without having them rejected or cancelled, there is no reason why T-Mobile and Sprint could not likewise submit their intermodal porting requests.

Nonetheless, T-Mobile and Sprint make unsupported assertions regarding their number portability requests. First, T-Mobile and Sprint assert that “approximately 50 percent of T-Mobile’s intermodal port requests require the submission of a supplemental LSR before the request is validated . . . [and] Sprint is also required to resubmit a high number of LSRs.” T-Mobile/Sprint Petition at 5. Their unsupported figure is much higher than Verizon’s overall performance results for intermodal and intramodal number portability requests. As noted above, Verizon’s overall rejection rate for number portability requests submitted in Verizon East states during December of last year was less than 7 percent. Canny Decl. ¶ 10. Moreover, Verizon’s rejection rate for T-Mobile’s number portability requests submitted that same month in the Verizon East states was only **[Begin Proprietary] [End Proprietary]** percent and for Sprint was only **[Begin Proprietary] [End Proprietary]** percent. *Id.* While Verizon’s data show that the rejection rates for number portability requests submitted by T-Mobile and Sprint are not as high as they claim, they are higher than the rejection rates for other carriers. This difference in rejection rates between individual carriers indicates that the problem lies with T-Mobile and Sprint, not Verizon. In approving Verizon’s long distance applications, the Commission

consistently found that where some carriers better ordering performance than other carriers, it was the carriers experiencing poor ordering performance that were responsible for that performance.⁴

Second, they assert that “the cancellation rate for intermodal ports is approximately 30 percent.” T-Mobile/Sprint Petition at 5. Again, their unsupported figure is much higher than Verizon’s overall performance results for number portability requests. As noted above, the cancellation rate for number portability requests submitted in Verizon East states during December 2006 was less than 4 percent. Canny Decl. ¶ 10. Moreover, T-Mobile’s cancellation rate for number portability requests that same month was only **[Begin Proprietary] [End Proprietary]** percent and Sprint’s cancellation rate was only **[Begin Proprietary] [End Proprietary]** percent. *Id.* Again, the fact that T-Mobile and Sprint are experiencing higher cancellation rates than other carriers indicates that T-Mobile and Sprint – not Verizon – are responsible for their higher cancellation rates.

B. Verizon’s LSR Requirements for Number Portability are Reasonable.

Verizon uses a Local Service Request (“LSR”) form to process number portability requests that complies with the Local Service Ordering Guidelines (“LSOG”) issued by the Ordering and Billing Forum (“OBF”) of the Alliance for Telecommunications Industry Solutions (“ATIS”). The LSR is designed to be a universal ordering form that can be used by carriers to order a wide range of services and facilities, such as services for resale, unbundled network

⁴ *Bell Atlantic New York Section 271 Order*, 15 FCC Rcd 3953, ¶ 181 (1999) (“An examination of flow-through rates of individual competing carriers ordering resale services from [Verizon] show flow-through rates in September ranging from about one to 82 percent. Because all carriers ordering resale services from [Verizon] interface with the same [Verizon] systems, we conclude that this wide range of results for competitors strongly implies that competitors are likely more responsible for low average flow-through performance than [Verizon].”).

elements, directory listings, and number portability. As such, it includes all of the fields that could be needed to order any type of service. In practice, however, a typical carrier order requires only a small fraction of the fields completed on the LSR.

In their Petition, T-Mobile and Sprint assert that “most incumbent LECs require their competitors to request ports by submitting Local Service Requests (‘LSRs’) that contain more than 100 data fields” and reference Verizon and BellSouth LSRs. T-Mobile/Sprint Petition at 4. Their assertion is misleading. While the LSR forms used by Verizon do contain over 100 fields, the vast majority of those fields are not required for number portability requests. Those additional fields are only used when ordering other types of services or facilities.

For example, in the Verizon East states, only 26 fields on the LSR need to be completed for an intermodal number portability request under the industry guidelines for number portability (LSOG). *See* Ex. A. But not all of those fields need to be completed by a wireless carrier’s service representative. There are 21 fields on the LSR that can be entered automatically by the wireless carrier’s ordering systems because they are either the same for all LSRs submitted by that carrier or they are computed or created by that carrier. For example, one field on the LSR calls for the Customer Carrier Name Abbreviation (“CCNA”). Each wireless carrier has its own unique CCNA, and that CCNA should be entered automatically on each of its LSRs. Likewise, each LSR needs a unique Purchase Order Number (“PON”) in order to track that LSR as it is processed. Each wireless carrier should be able to generate automatically a unique PON for each of its LSRs requesting number portability.

The remaining five fields are the only fields on the LSR for Verizon East states that require customer-specific information. These five fields are: (1) the customer’s name (NAME); (2) the state where the customer has service (STATE); (3) the customer’s account number

(EATN); (4) the customer's telephone number to be ported (PORTED NBR); and (5) whether the customer has residential or business service (TOS).

In the Verizon West states,⁵ there are a few different and additional fields on the LSR that need to be completed for an intermodal number portability request consistent with industry guidelines (LSOG). *See* Ex. B. As with the Verizon East LSR, most fields on the Verizon West LSR can be entered automatically by the wireless carrier's ordering systems. The principal difference is that the Verizon West LSR calls for the customer's complete address (SANO, SASD, SASN, SATH, CITY, STATE, and ZIP).

T-Mobile and Sprint argue that “[i]f just one piece of information provided by the requesting carrier via the LSR is incorrect (*e.g.*, abbreviating Avenue as ‘Av.’ Instead of ‘Ave.’), the incumbent LEC will reject the port request.” T-Mobile/Sprint Petition at 4. This is not true as to Verizon. In Verizon East states, Verizon's LSR does not require the customer's full address. In Verizon West states, Verizon does not verify the customer's address against the customer's account. Verizon simply verifies that the state listed on the LSR is the same state associated with the account number. Canny Decl. ¶ 11.

Verizon does, however, validate certain information on an LSR requesting number portability. For example, Verizon matches the account number and telephone number on the LSR with its customer service records. If a digit is incorrect in either of those numbers, Verizon will reject the LSR because Verizon cannot be sure it would be porting the appropriate customer's telephone number.

⁵ The Verizon West states include: Arizona; California; Florida; Idaho; Illinois; Indiana; Michigan; Nevada; North Carolina; Ohio; Oregon; South Carolina; Texas; Washington; and Wisconsin.

T-Mobile and Sprint also assert that “incumbent LECs regularly reject the forms as soon as they identify a single error, rather than pointing out all errors in the first round.” T-Mobile/Sprint Petition at 5. Again, this is not true for Verizon. If a wireless carrier uses a current version of the LSR and properly indicates that it is a number portability request from a wireless carrier, Verizon’s systems will review the entire LSR for errors. Verizon will provide a notice back to the wireless carrier indicating all of the errors that need to be corrected. The wireless carrier can then correct all of the errors by submitting a supplement to its original LSR. Canny Decl. ¶ 12. In fact, the LNPA Working Group designated the identification of all errors on a number portability request as a “best practice.”⁶

Finally, T-Mobile and Sprint assert that “LSRs are changed as many as four times per year without prior notice to other service providers.” T-Mobile/Sprint Petition at 4. T-Mobile and Sprint fail to mention that many of these changes are made at the request of carriers through industry fora. Nonetheless, before implementing changes to its LSR, Verizon provides all carriers with at least 73 days notice. This process for notifying carriers of changes to Verizon’s ordering processes was developed with carriers as part of the change management process that was approved by the FCC when it granted Verizon long distance authority for New York.⁷ In addition, Verizon has frequently made arrangements with carriers to continue using a prior LSR version after a new LSR version is implemented.

⁶ See *LNPA Best Practices Document 39* (“When a Service Provider receives a port request, they should read as much of the port request as possible to identify and provide as much information on all errors as is possible to report on the response. Service providers should avoid a process of only reporting one error on each response to a port request resulting in a prolonged process of submitting multiple, iterative port requests for a single port, each time restarting the response timers.”). www.npac.com/cmas/LNPA/best_practices_39.htm.

⁷ *Bell Atlantic New York Section 271 Order*, 15 FCC Rcd 3953, ¶¶ 113-118 (1999).

III. Carriers Are Continuing to Work Together to Improve Intermodal Porting Processes

Verizon is committed to continuing to work with the industry to improve number porting systems and processes. These efforts have been and continue to be successful. There is no reason for the Commission to interfere with these efforts.

For example, Verizon offers a standard interval of 3 business days for simple number portability requests, regardless of how long it takes to issue a confirmation for such requests. This standard interval is one day less than the industry standard of 96 hours. While carriers have the option of requesting that a number be ported within this standard three-business-day interval, carriers usually request a longer interval. For example, during December 2006, 89.4 percent of all number portability requests submitted in the Verizon East states had a due date longer than the standard interval. Canny Decl. ¶ 5. During this same month, **[Begin Proprietary]** **[End Proprietary]** percent of number portability requests submitted by T-Mobile in the Verizon East states had a due date longer than the standard interval and **[Begin Proprietary]** **[End Proprietary]** percent of such requests submitted by Sprint asked for a due date longer than the standard interval. *Id.* ¶ 9.

In addition, Verizon has continued to be an active participant in the industry's LNPA Working Group. The LNPA Working Group has reviewed and refined a wireline to wireless porting checklist to assist wireless carrier's service representatives in obtaining the necessary information from their customers to prepare a number portability LSR. This checklist is now in use by many wireless carriers. Sacra Decl. ¶ 6.

The LNPA Working Group has also resolved issues raised by the wireless industry. For example, Syniverse, a third party processor of wireless porting requests, raised an issue regarding the number of jeopardy notifications it received from incumbent carriers for the porting requests

it had submitted on behalf of wireless carriers. The LNPA Working Group researched the issue and determined that a significant percentage of the jeopardizes were issued against duplicate LSRs and requests to port numbers that had already been disconnected. *Id.* ¶ 7. Based on the results of this research, Syniverse notified the LNPA Working Group that the issue was resolved. *Id.*

The LNPA Working Group also worked to resolve an issue regarding the differences between the wireline and wireless number portability systems. In this case, the wireline systems allowed for a change in the due date and time when a confirmation was issued in response to a number portability request from a wireless carrier, but the wireless systems could not accept a change in the due date or time. The LNPA Working Group referred this issue to the OBF's Wireless Committee and the Local Service Ordering and Provisioning Committee. *Id.* ¶ 8. As a result of their efforts, the Wireless Intercarrier Communication Interface Specifications ("WICIS") were modified to accept due date and time changes and this modification was implemented in February 2006 with WICIS Release 3.0. *Id.*

The LNPA Working Group is continuing to address issues related to intermodal porting, including the mapping of wireless Port Requests to wireline LSRs and wireless Port Request Responses to wireline Firm Order Confirmations. *Id.* ¶ 9. In addition, the OBF Wireless Committee and the LSOP Committee are continuing to address intermodal porting issues, such as documentation for mapping WICIS to LSOG (Issue 3029); a minimal data exchange for number portability requests (Issue 2943); an accelerated port process (Issue 3065); and an audit of data elements (Issue 3024). *Id.* According to the LNPA Working Group Status Report to the North American Numbering Council (January 2007), "wireless providers and Clearinghouse Vendors are continuing to work with wireline carriers and their respective change management

processes through their Account Management to identify possible process enhancements” for intermodal number portability requests.

These industry efforts have successfully developed and implemented number portability systems and processes that work. Because these efforts are continuing to improve these systems and processes, there is no reason for the Commission to interfere with them.

CONCLUSION

For the foregoing reasons, the Commission should consider the issues raised in the T-Mobile/Sprint Petition as part of its consideration of the issues raised in its Second Notice in this docket. The Commission should not adopt any rules governing the forms used to process intermodal number portability requests.

Respectfully submitted,

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Counsel for Verizon

Date: February 8, 2007

EXHIBIT A

Verizon East¹ LSR Requirements for Intermodal Ports

	Field Name	Field Description	Can Field Be Completed Automatically by Carrier's Mechanized Systems?	Criteria for Valid Entry
LSR Form				
1	CCNA	Customer Carrier Name Abbreviation	Yes, entry same for all LSRs submitted by carrier	Must match CCNA in VZ table
2	PON	Purchase Order Number	Yes, PON is created by carrier submitting LSR	Must be alpha-numeric with no spaces
3	VER	Version	Yes, version number is tracked by carrier submitting LSR	Must be entered if LSR is a supplement
4	LOCQTY	Location Quantity	Yes, default entry for wireless carrier should be "1"	None
5	D/TSENT	Date and Time Sent	Yes, entry should be the date and time the LSR is transmitted	Must be in OBF standard format
6	DDD	Desired Due Date	Yes, can be calculated and entered by adding at least the standard interval to current date	Must be valid future date of less than one year that is consistent with VZ standard interval (3 days) and OBF format
7	DFDT	Desired Frame Due Time	Yes	Must not be blank
8	REQTYP	Request Type	Yes, entry for wireless carrier should be "CB" to indicate number portability firm order	
9	ACT	Activity	Yes, entry for wireless carrier should be "V" to indicate conversion of service to new local carrier	
10	NNSP	New Network Service Provider Identification	Yes, entry same for all LSRs submitted by carrier	Must match NNSP in NPAC table
11	AGAUTH	Agency Authorization Status	Yes, entry should be "Y" if carrier's authorization is on file.	
12	TOS	Type of Service	No, information provided by customer	Must match type of service on CSR for customer's account telephone number.

¹ The Verizon East states include: Connecticut; Delaware; Maine; Maryland; Massachusetts; New Hampshire; New Jersey; New York; Pennsylvania; Rhode Island; Vermont; Virginia; Washington, DC; and West Virginia.

	Field Name	Field Description	Can Field Be Completed Automatically by Carrier's Mechanized Systems?	Criteria for Valid Entry
13	NPDI	Number Portability Direction Indicator	Yes, entry should be "C" to indicate wireline to wireless port	
14	INIT	Initiator Identification	Yes, entry should be carrier's representative's name	None
15	TEL NO	Initiator Telephone Number	Yes, entry should be carrier's representative's telephone number	None.
EU Form				
16	LOCNUM	Location Number	Yes, entry should be "1"	
17	NAME	End User Name	No, information should be provided by customer	Must match name on CSR for customer's account telephone number and be in OBF format
18	STATE	State/Province	No, information should be provided by customer	Must match state of eATN
19	ELT	End User Listing Treatment	Yes, entry should be "B" if customer's directory listing should not be retained	
20	EATN	Existing Account Telephone Number	No, information should be provided by customer	Must be the main billing telephone number on the customer's CSR
NP Form				
21	NPQTY	Number Portability Quantity	Yes, entry should be "1" if only one line is being ported	
22	LOCNUM	Location Number	Yes, entry should be "1"	
23	LNUM	Line Number	Yes, entry should be "1"	
24	LNA	Line Activity	Yes, entry should be "V" to indicate conversion of service to new local carrier	
25	PORTED NBR	Ported Telephone Number	No, information should be provided by customer	Must match telephone number on customer's CSR
26	NPT	Number Portability Type	Yes, entry should be "D" to indicate local routing number	

EXHIBIT B

Verizon West¹ LSR Requirements for Intermodal Ports

	Field Name	Field Description	Can Field Be Completed Automatically by Carrier's Mechanized Systems?	Criteria for Valid Entry
LSR Form				
1	CCNA	Customer Carrier Name Abbreviation	Yes, entry same for all LSRs submitted by carrier	Must match CCNA in VZ table
2	PON	Purchase Order Number	Yes, PON is created by carrier submitting LSR	Must be alpha-numeric with no spaces
3	VER	Version	Yes, version number is tracked by carrier submitting LSR	Must be entered if LSR is a supplement
4	ATN	Account Telephone Number	No, information provided by customer	Must match VZ account telephone number
5	D/TSENT	Date and Time Sent	Yes, entry should be the date and time the LSR is transmitted	Must be in OBF standard format
6	DDD	Desired Due Date	Yes, can be calculated and entered by adding at least the standard interval to current date	Must be valid future date of less than one year that is consistent with VZ standard interval (3 days) and OBF format
7	REQTYP	Request Type	Yes, entry for wireless carrier should be "CB" to indicate number portability firm order	
8	ACT	Activity	Yes, entry for wireless carrier should be "V" to indicate conversion of service to new local carrier	
9	RVER	Release Version	Yes, entry for wireless carrier should be "9" to indicate version of LSOG being used	
10	NNSP	New Network Service Provider Identification	Yes, entry same for all LSRs submitted by carrier	Must match NNSP in NPAC table
11	AGAUTH	Agency Authorization Status	Yes, entry should be "Y" if carrier's authorization is on file.	
12	TOS	Type of Service	No, information provided by customer	None.

¹ The Verizon West states include: Arizona; California; Florida; Idaho; Illinois; Indiana; Michigan; Nevada; North Carolina; Ohio; Oregon; South Carolina; Texas; Washington; and Wisconsin.

	Field Name	Field Description	Can Field Be Completed Automatically by Carrier's Mechanized Systems?	Criteria for Valid Entry
13	NPDI	Number Portability Direction Indicator	Yes, entry should be "C" to indicate wireline to wireless port	
14	TEL NO	Initiator Telephone Number	Yes, entry should be carrier's representative's telephone number	Must not be blank.
EU Form				
15	PON	Purchase Order Number	Yes, PON is created by carrier submitting LSR	Must be same as on LSR Form
16	VER	Version	Yes, version number is tracked by carrier submitting LSR	Must be same as on LSR Form
17	ATN	Account Telephone Number	No, information should be provided by customer	Must be same as on LSR Form
18	LOCNUM	Location Number	Yes, entry should be "1"	
19	NAME	End User Name	No, information should be provided by customer	Must match name on CSR for customer's account telephone number and be in OBF format
20	SANO	Service Address Number	No, information should be provided by customer	None
21	SASD	Service Address Street Prefix	No, information should be provided by customer	None
22	SASN	Service Address Street Name	No, information should be provided by customer	None
23	SATH	Service Address Street Type	No, information should be provided by customer	None
24	CITY	City	No, information should be provided by customer	None
25	STATE	State/Province	No, information should be provided by customer	Must match state of ATN
26	ZIP	Postal Code	No, information should be provided by customer	None.
27	ELT	End User Listing Treatment	Yes, entry should be "B" if customer's directory listing should not be retained	
28	EATN	Existing Account Telephone Number	No, information should be provided by customer	Must be the main billing telephone number on the customer's CSR
NP Form				

	Field Name	Field Description	Can Field Be Completed Automatically by Carrier's Mechanized Systems?	Criteria for Valid Entry
29	PON	Purchase Order Number	Yes, PON is created by carrier submitting LSR	Must be same as on LSR Form
30	VER	Version	Yes, version number is tracked by carrier submitting LSR	Must be same as on LSR Form
31	ATN	Account Telephone Number	No, information should be provided by customer	Must be same as on LSR Form
32	LOCNUM	Location Number	Yes, entry should be "1"	
33	LNUM	Line Number	Yes, entry should be "1"	
34	LNA	Line Activity	Yes, entry should be "V" to indicate conversion of service to new local carrier	
35	TDT	Ten Digit Trigger	Yes, entry should be "Y" to indicate the request for activation of a ten digit trigger for local routing number portability	
36	PORTED NBR	Ported Telephone Number	No, information should be provided by customer	Must match telephone number on customer's CSR
37	NPT	Number Portability Type	Yes, entry should be "D" to indicate local routing number	

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

CC Docket No. 95-116

Telephone Number Portability

DECLARATION OF JULIE A. CANNY

1. My name is Julie A. Canny. I am Executive Director – Metrics and Regulatory Advocacy in Verizon Partner Solutions. I am responsible for developing and implementing Verizon’s performance measurements and remedy plans for wholesale products and services, including number portability. I have held similar responsibilities for Verizon or its predecessor companies (collectively, “Verizon”)

2. In my 26 years with Verizon, I have held various positions in Installation, Maintenance and Construction Engineering and Planning and Budgeting. I hold a Bachelor of Science in Mathematical Economics and Management from Simmons College in Boston, Massachusetts, and a Master of Business Administration degree, with a concentration in Finance, from Babson College in Wellesley, Massachusetts. I also represent Verizon on a number of industry fora charged with performance measures.

3. The purpose of my declaration is to respond to the assertions made by T-Mobile and Sprint in their petition for declaratory ruling regarding the performance of wireline carriers in processing number portability requests. Given the limited time available for responding to that petition, I have examined Verizon’s recent performance

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data on number portability that are readily available in Verizon's databases.¹ These data show that Verizon's performance in providing number portability continues to be excellent. Verizon is completing well over 99 percent of all porting requests on time. In addition, over 91 percent of number portability requests flow through Verizon's ordering and provisioning systems, and only a small fraction of number portability requests are rejected or cancelled.

4. First, Verizon's on time performance for completing number portability requests is nearly perfect. In 2006, Verizon (former Bell Atlantic and GTE entities) completed nearly 0.9 million intramodal and intermodal porting requests. Over 99.5 percent of these porting requests were completed on time.

5. Second, even though Verizon offers a standard interval of 3 business days for simple number portability requests, carriers usually request a longer interval. During December 2006, 89.4 percent of all number portability requests submitted in the Verizon East states had a due date longer than the 3 business day standard interval.

6. Third, the vast majority of these number portability requests flowed through Verizon's ordering and provisioning systems on a mechanized basis without manual intervention. In December 2006, the flow through rate for number portability requests submitted in the Verizon East states was 91.8 percent.

¹ With the exception of on time performance, Verizon's number portability performance results are readily available only for Verizon East states, which include the former Bell Atlantic service territories and the former GTE service territories in Virginia. Comparable performance results were not available for other states because performance reporting requirements are not uniform in those states.

7. Fourth, only a small fraction of number portability requests are rejected by Verizon's systems. In December 2006, Verizon's reject rate for number portability requests submitted in the Verizon East states was only 6.7 percent.

8. Fifth, very few number portability requests are cancelled by carriers after they submit them to Verizon. For December 2006, the cancellation rate for number portability requests submitted in the Verizon East states was only 3.6 percent.

9. I have also examined Verizon's readily-available performance data on the number portability requests submitted by T-Mobile and Sprint. For the last six months of 2006, over **[Begin Proprietary] [End Proprietary]** percent of the porting requests submitted by T-Mobile and Sprint in the Verizon East states were completed on time. During December 2006, Verizon's flow through rate on porting requests submitted by T-Mobile in the Verizon East states was **[Begin Proprietary] [End Proprietary]** percent and for Sprint was **[Begin Proprietary] [End Proprietary]** percent. In addition, during December 2006, **[Begin Proprietary] [End Proprietary]** percent of number portability requests submitted by T-Mobile in the Verizon East states had a requested due date longer than the standard interval and **[Begin Proprietary] [End Proprietary]** percent of such requests submitted by Sprint requested a due date longer than the standard interval.

10. During December 2006, Verizon's rejection rate for all number portability requests in the Verizon East states was less than 7 percent. During that same month, the rejection rates for T-Mobile's number portability requests submitted in the Verizon East states was **[Begin Proprietary] [End Proprietary]** percent and for Sprint's number portability requests was **[Begin Proprietary] [End Proprietary]** percent. In addition,

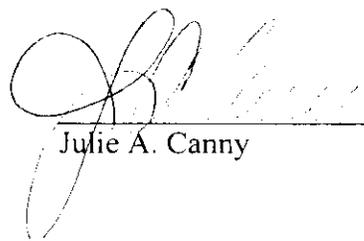
during December 2006, the cancellation rate for all number portability requests in the Verizon East states was less than 4 percent. During that same month, T-Mobile's cancellation rate for number portability requests in the Verizon East states was **[Begin Proprietary [End Proprietary]** percent and Sprint's cancellation rate was only **[Begin Proprietary] [End Proprietary]** percent.

11. Verizon does not reject number portability requests for errors in the customer's address. In the Verizon East states, Verizon's LSR does not require the customer's full address. In the Verizon West states, Verizon does not verify the customer's address against the customer's account. Verizon simply verifies that the state listed on the LSR is the same state associated with the account number.

12. Verizon also does not reject a number portability request based solely on the first error identified on the request. If a wireless carrier uses a current version of the LSR and properly indicates that it is a number portability request from a wireless carrier (REQTYP, ACT and LNA fields on LSR), Verizon's ordering systems will review the entire LSR for errors. Verizon will provide a notice back to the wireless carrier indicating all of the errors that need to be corrected. The wireless carrier can then correct all of the errors by submitting a supplement to its original LSR. In a relatively small number of instances, an LSR that is accepted by Verizon's ordering systems may later be rejected for errors as the LSR moves through Verizon's provisioning processes and systems.

13. This concludes my declaration.

I, Julie A. Canny, declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.



Julie A. Canny

Date: February 8, 2007

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

CC Docket No. 95-116

Telephone Number Portability

DECLARATION OF KIM M. BROWN

1. My name is Kim M. Brown. I am Director – Wholesale & IT Compliance in Verizon’s Legal Organization. My responsibilities include oversight of the process used to provide responses back to the FCC on any Local Number Portability complaints filed by end user customers.

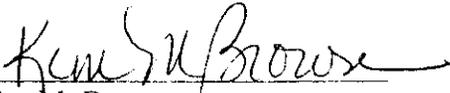
2. In my 26 years with Verizon, I have held various positions in Budgeting, Finance and Regulatory Planning. I hold a Bachelor of Science in Accounting from the University of Wisconsin – Whitewater.

3. The number of intermodal porting complaints has declined during the last two years. In 2004, there were 255 intermodal porting complaints involving Verizon (former Bell Atlantic and GTE entities) filed with the FCC. Two years later, in 2006, there were only 9 such intermodal complaints.

4. This concludes my declaration.

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I, Kim M. Brown, declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.


Kim M. Brown

Date: February 8, 2007

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Telephone Number Portability

CC Docket No. 95-116

DECLARATION OF GARY SACRA

1. My name is Gary Sacra. I am a Distinguished Member of the Technical Staff in Verizon's Technology Organization. In my 28 years with Verizon or its predecessor companies (collectively, "Verizon"), I have held various positions in Engineering, Planning, and Industry Standards. I graduated with Honors from Towson University with a Bachelor of Science degree in Mathematics. In addition, I graduated from the Advanced Technology Institute at Carnegie Mellon University in Pittsburgh, Pennsylvania.

2. Since 1994, I have worked on the implementation of Local Number Portability ("LNP") for Verizon. I also currently represent Verizon on a number of industry fora charged with addressing LNP issues and developing LNP standards. I currently serve as a Co-Chair of the Local Number Portability Administration Working Group ("LNPA WG"), which reports to the North American Numbering Council ("NANC"). I also represent the LNPA WG at each of the NANC meetings. In addition, I am an industry LNP Project Executive, serving as a technical advisor to the North American Portability Management LLC on matters involving the NeuStar Number Portability Administration Centers ("NPACs").

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3. The total number of industry wireline and wireless competitive ports since December 2003 reflected in Verizon's comments, 80 million, is an approximate number obtained from NeuStar, which administers and maintains the seven regional NPAC databases. This number is the approximate quantity of inter-provider ports that have taken place between December 1, 2003 and December 31, 2006. It is an approximate number because the total count of 80 million was partially derived by NeuStar by determining the quantity of inter-provider ported records in the seven regional NPAC databases on a monthly basis and comparing the counts month by month for a portion of this timeframe.

4. The 80 million figure is conservative for two reasons. First, this monthly "snapshot" method of approximating the number of ports that have taken place in this period does not capture any existing ported numbers that have ported again during the timeframe this method was used because that activity would not produce an additional ported number record in the database.

5. Second, the 80 million figure does not include numbers that have been pooled to carriers using LNP functionality. That is, it does not include numbers that were ported from one carrier's switch to another carrier's switch as a result of thousands-block number pooling, in which entire groups or sets of 1,000 numbers are moved between carriers before assignment to customers as part of the Commission's efforts to stem exhaustion of numbering resources.

6. Verizon has continued to be an active participant in the industry's LNPA WG. Verizon helped the LNPA WG review and refine a wireline to wireless porting checklist to assist wireless service representatives in obtaining the necessary information from their customers to prepare a number portability LSR. This checklist is now in use by many wireless carriers.

7. The LNPA WG has also resolved issues raised by the wireless industry. For example, Syniverse, a third party processor of wireless porting requests, raised an issue regarding the number of jeopardy notifications being issued by incumbent carriers against the porting requests it had submitted on behalf of wireless carriers. The LNPA WG researched the issue and determined that a significant percentage of the jeopardies were issued against duplicate number portability requests and requests to port numbers that had already been disconnected. Based on the results of this research, Syniverse notified the LNPA WG that the issue was resolved.

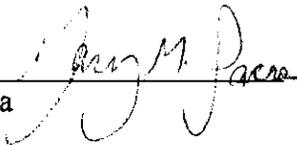
8. Verizon also helped the LNPA WG resolve an issue regarding the differences between the wireline and wireless number portability systems. In this case, the wireline systems allowed for a change in the due date and time when a confirmation was issued in response to a number portability request from a wireless carrier, but the wireless systems could not accept a change in the due date or time. The LNPA WG referred this issue to the Ordering and Billing Forum (“OBF”) Wireless Committee and the Local Service Ordering and Provisioning (“LSOP”) Committee. As a result of their efforts, the Wireless Intercarrier Communication Interface Specifications (“WICIS”) were modified to accept due date and time changes. This modification was implemented in February 2006 with WICIS Release 3.0.

9. The LNPA WG is continuing to address issues related to intermodal porting, including the mapping of wireless Port Requests to wireline LSRs and wireless Port Request Responses to wireline Firm Order Confirmations. In addition, the OBF Wireless Committee and the LSOP Committee are continuing to address intermodal porting issues, such as documentation for mapping WICIS to LSOG (Issue 3029); a minimal data exchange for number portability requests (Issue 2943); an accelerated port process (Issue 3065); and an audit of data elements

(Issue 3024). According to the LNPA WG Status Report to the North American Numbering Council (January 2007), “wireless providers and Clearinghouse Vendors are continuing to work with wireline carriers and their respective change management processes through their Account Management to identify possible process enhancements” for intermodal number portability requests.

10. This concludes my declaration.

I, Gary Sacra, declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.



Gary Sacra

Date: February 6, 2007