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April 16,2007

Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch

On April 13,2007, Cindy Sheehan, Beth Choroser and the undersigned of Comcast Corporation met with John Hunter, Chief of Staff to Commissioner Robert McDowell and, separately, met with representatives of the Wireline Competition Bureau in connection with Comcast's filing in the above-captioned proceeding. The attached reflects the substance of Comcast's presentations.

Please do not hesitate to contact me if you have any questions about this matter.

Sincerely,

Mary McSlarrow

Cc: John Hunter
Adam Kirschenbaum
Marcus Maher
Rodney McDonald
Christi Shewman
Tim Stelzig
Ann Stevens
Frederick Helenihi

Local Number Portability

April 13, 2007

Comcast's Port-Out Process

- Monday through Friday if a valid Local Service Request (LSR) is received by 3:00p.m. MST, Comcast will submit a Firm Order Confirmation (FOC) for the next calendar day if requested
  - Comcast supports FOC dates for Saturday and Sunday
- The New Service Provider can port the telephone number (TN) anytime within 7 business days from the FOC date.
  - This ensures that the customer will not lose dial tone if the TN is not activated in NPAC before Comcast disconnects the telephone number in our switch
  - Also minimizes a lot of re-work (cost) for both Comcast and the New Service Provider.
- If the TN is not activated in NPAC within the 7 business days, we cancel the order on the 8th day in our billing system and continue to provide service to the customer

Comcast's Port-In Process

- **Comcast submits the LSR to port the customer pursuant to the porting intervals and business rules of the ILEC and CLECs to obtain a FOC.**
- **Burdens of ILEC porting practices have not been overstated.**
  - Comcast has made a substantial investment to develop and implement an automated electronic interface to submit the LSR to the ILEC.
  - Even with the automation we still have approximately 15% - 20% ILEC fallout that requires manual intervention.
  - It is cumbersome and time-consuming to review ILEC business rules and all of the many fields required on their LSR.
  - Each new Local Service Ordering Guide (LSOG) takes a considerable amount of time to review.
  - Pending work orders in the ILEC's billing system cause installation delays.
  - One rural ILEC requires the circuit ID on LSRs.
- **CLEC porting practices are also a problem.**
  - Very few CLECs provide a Customer Service Record (CSR) to validate how their customer's account is set up which delays our porting intervals by as much as 60%.
  - Rejected orders with more than one reject reason are not always reported on the first reject, adding time to the provisioning work and requiring rescheduling with the customer.
  - Inconsistent reject reasons
  - Ported numbers from CLECs who have partnered with VoIP providers can take up to 30 days to complete.

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Comcast Supports the T-Mobile/Sprint Petition

- Requiring a match on the telephone number, 5-digit zip and customer's account number provides the necessary information to identify the specific customer and prevent an inadvertent port.
  - The major wireless carriers validate on these same fields without problems.
- The number of fields required by the ILECs and CLECs for validation are unnecessary.
- The current practice increases the opportunity for error, delays the porting interval, and often requires Comcast to reschedule the order.
  - The delay impacts the customer due to a longer interval to install their service.
  - Streamlining will lower costs by reducing fall-out and the need for manual intervention.
- The industry bodies have examined the issue but cannot bring it to resolution.

Consumers Want a Shorter Porting Interval

- Wireless industry porting practices have changed consumers' expectations – they expect a quick and seamless change in service providers.
- Wireline porting practices are out of step with consumers and rely on outdated systems.
- For converged networks offering a bundle of services to consumers, unnecessary delays in porting inconvenience consumers and impede technological advancements.
  - Triple-play customers want all three services activated immediately.
  - Comcast self-installation kits for voice avoid the inconvenience of having to be at home when a technician visits – but are only available for "native" numbers due to lengthy porting intervals.
- Comcast proposed a "next day" standard that in most cases would not exceed 36 hours.

Commission Action is Needed

- Industry bodies have contributed to the deployment of number portability, but even state regulators and members of the NANC recognize the need for Commission action.
- The validation practices employed by the ILECs and many CLECS are inconsistent with Commission policy.
  - The Commission can adopt a simple and uniform industry porting validation process that limits the number of criteria to those "necessary" for customer validation.
- The Commission has previously sought comment on NANC's recommendation to reduce the wireline porting interval to 53 hours.
  - Comcast urges the Bureau to refresh the record in that proceeding, with specific focus on updating NANC's cost/benefit analysis.
  - The current porting interval is impeding innovations that benefit consumers.

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