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July 31, 2007

Corrected Ex Parte

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

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

Dear Ms. Dortch:

On Friday, July 27, 2006, Verizon filed the following ex parte without the corresponding attachment. Please submit the enclosed corrected version in the record in the above proceeding. Please let me know if you have any questions.

Sincerely,

Attachment

cc: Adam Kirschenbaum
Marcus Maher
Christi Shewman
Ann Stevens

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Ex Parte

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

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

Dear Ms. Dortch:

Verizon submits this letter to respond to several arguments raised in reply comments regarding the Petition for Declaratory Ruling filed by T-Mobile USA, Inc. and Sprint Nextel Corporation (collectively, "T-Mobile/Sprint") and Integra Telecom, Inc. ("Integra") in the above-captioned proceeding.[1] As discussed below, none of these arguments provides a basis for the Commission to regulate the industry forms used to process number portability requests.

First, T-Mobile and Sprint argue that, under their proposal, "ILECs would not be required to alter their LSRs and other forms." T-Mobile/Sprint Reply Comments[2] at 12. They assert that if the Commission issues the declaratory ruling they requested, "competitive carriers would only have to enter data in four customer validation fields, and ILECs could not reject the port request unless there was an error in one of the four fields." *Id.* T-Mobile and Sprint's argument incorrectly assumes that a number portability request form only needs to have four fields filled in and ignores the other critical information necessary to process a number portability request.

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[1] Petition for Declaratory Ruling, *Telephone Number Portability*, CC Docket No. 95-116, DA 07-39 (Dec. 20, 2006).

[2] Joint Reply Comments of T-Mobile USA and Sprint Nextel Corporation, Telephone Number Portability, CC Docket No. 95-116; T-Mobile USA, Inc. and Sprint Nextel Corporation Petition for Declaratory Ruling, DA 07-39 (Feb. 23, 2007)("T-Mobile/Sprint Reply Comments").

It is not reasonable, however, to expect either wireless carriers or landline carriers to port a telephone number where only four fields are filled out on the number portability request form, as T-Mobile and Sprint argue. *See id*. This request is contrary to industry practice. For example, the number portability request form used by the wireless industry is two-pages long and has 41 fields. *See* Attachment A to this Letter. Of those 41 fields, 31 are either mandatory or conditional, and 10 are optional.

Similarly, the forms used by Verizon for number portability requests require a comparable number of fields. For example, in the Verizon East states (the former BellAtlantic 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* Verizon Comments[3] at Attachment A.

In each case, some of the fields are used to validate the identity of the customer whose number is being ported. For example, the wireless industry uses four of its 41 fields to validate the identity of the customer whose number is being ported, and Verizon East uses five of its 26 fields for the same purpose. The information in the remaining fields is also needed to complete the porting request. Such information includes the submitting carrier, the customer's current carrier, the direction of the port (*e.g.*, wireline to wireless), and the desired due date and time for the port. The information in these and other fields is necessary for completing a port request.

Nor is it reasonable to expect carriers to port a telephone number where there are errors in the fields on the number portability request form. *See* T-Mobile/Sprint Reply Comments at 12. For example, if a wireless carrier or landline carrier receives a number portability request form with a desired due date that has already passed (*e.g.*, a request submitted in May with an April due date), there is an obvious error on that form, and the executing carrier should be able to reject it and not process it. Similarly, if the port request form identifies the submitting carrier and the current service provider as the same carrier, the form has an error and should not be processed. Under T-Mobile and Sprint's proposal, wireline carriers would be required to process such port requests even if it would lead to a complete loss of service.

Second, T-Mobile and Sprint argue that "a reduction in the number of validation fields in all likelihood would result in a cost savings to both the competitive carriers and the LECs from whom numbers are being ported." *See* T-Mobile/Sprint Reply Comments at 12. Verizon is already validating the customer on only five fields or items of information on the number portability request – namely, account number, ported telephone number, state, type of service, and, in some jurisdictions, customer name. This is only one more validation field than the four validation fields proposed by T-Mobile and Sprint. T-Mobile and Sprint provide no support for, and do not quantify, the alleged cost savings that would result from one fewer validation field.

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[3] *See* Verizon's Opposition to T-Mobile USA, Inc. and Sprint Nextel's Petition for Declaratory Ruling Regarding Number Portability, *Telephone Number Portability*, CC Docket No. 95-116 (Feb. 8, 2007)("Verizon Comments").

Moreover, reducing or changing the number of validation fields on Verizon's number portability request form would not result in "reduced fallout and its associated costly manual intervention required of both the new and old service providers," as T-Mobile and Sprint argue. *See id.* In fact, any change to these validation fields that reduces the number of rejected porting requests would likely increase manual intervention and erroneously ported numbers. As Verizon explained in its reply comments, the overwhelming majority of rejected porting requests from wireless carriers have the wrong account number, the wrong ported telephone number, or the wrong customer name. *See* Verizon Reply Comments[4] at 2-3. Accepting these porting requests, rather than rejecting them, would dramatically increase the quantity of numbers ported in error. Restoring telephone service to customers that have had their numbers ported in error requires costly manual intervention by both the new service providers and the old service providers.

Third, Integra argues that "[m]any incumbent LECs require requesting carriers to provide data on an LSR that is not strictly necessary to complete a port . . . simply to make the incumbent LEC's disconnection process easier." Integra Reply Comments[5] at 3. According to Integra, "the requesting carrier is not the executing carrier's agent and should not be expected to gather and provide information" to disconnect the customer's service. *Id*. at 4. Integra's argument is premised on the erroneous assumption that disconnecting the customer's service is not part of the process of porting the customer's telephone number.

When a customer's telephone number is ported to a new service provider, the customer's service with the old service provider is disconnected. The customer's new service provider is the customer's agent for the request to port the customer's number and to disconnect the customer's service from the old service provider. It is therefore entirely appropriate for a number portability request form to include all the information necessary for the old service provider to disconnect the customer's service.

Moreover, if the old service provider were not able to disconnect the customer's service with the information on the number portability request form, the old service provider would have to contact the customer to obtain that information. Adding this manual step to the number portability process would make it impossible to process porting requests on a mechanized basis. It could also drive up the cost of processing port requests and increase the interval for porting numbers.

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[4] *See* Verizon's Reply Comments to T-Mobile USA, Inc. and Sprint Nextel's Petition for Declaratory Ruling Regarding Number Portability, *Telephone Number Portability*, CC Docket No. 95-116 (Feb. 22, 2007)("Verizon Reply Comments").

[5] *See* Reply Comments of Integra Telecom, Inc. in Support of T-Mobile USA, Inc. and Sprint Nextel's Petition for Declaratory Ruling Regarding Number Portability, *Telephone Number Portability*, CC Docket No. 95-116 (Feb. 23, 2007)("Integra Reply Comments").

Finally, Integra argues that "[s]ome executing carriers require requesting carriers to notify them as early as before 3:00 pm on the day of a port if the port must be rescheduled." *Id*. at 5. Verizon does not impose such a requirement on requesting carriers.

Please let me know if you have any questions.

Sincerely,

Attachment

cc: Adam Kirschenbaum
Marcus Maher
Christi Shewman
Ann Stevens

Wireless Port Request (WPR)

27431

☐ **Initial Request**
OR
Supplement Type
☐ Cancel Request
☐ New Due Date and Time
☐ Other (Remarks Required)

Request Number

Version ID

Response Number

Marking Instructions
- Use Blue or Black Pen only
- Print one character per box
- Please stay inside the boxes
- Use UPPER CASE letters

A B C D E F G 1 2 3 4 5 6 7 Correct ■

Number Portability Direction Indicator
☐ Wireless to Wireless
☐ Wireless to Wireline
☐ Wireline to Wireless

Time Zone (mark one)
☐ AST ☐ MDT
☐ EST ☐ PST
☐ EDT ☐ PDT
☐ CST ☐ AKST
☐ CDT ☐ AKDT
☐ MST ☐ HST

Social Security Number/Tax ID

Password/PIN

Account Number

Old Network Service Provider

New Local Service Provider

New Network Service Provider

New Reseller Name

Date Sent (Month – Day – Year)

Time Sent (Hours : Minutes) ☐ AM ☐ PM

Desired Due Date (Month – Day – Year)

Desired Due Time (Hours : Minutes) ☐ AM ☐ PM

Coord. Hot Cut

Agency Auth. Status

Date of Agency Authorization (Month – Day – Year)

Authorization Name

Group Request Number

Initiator Identification (Creator)

Implementation Contact

Telephone Number for Implementation Contact

Bill Name (Responsible Party)

Prefix | First Name | MI

Last Name | Suffix

Business Name

Marking Instructions

- Use Blue or Black Pen only
- Please stay inside the boxes
- Print one character per box
- Use UPPER CASE letters

ABCDEFG 1234567 Correct ■

Street Address

Street Number | Street Name | Street Directional | Country

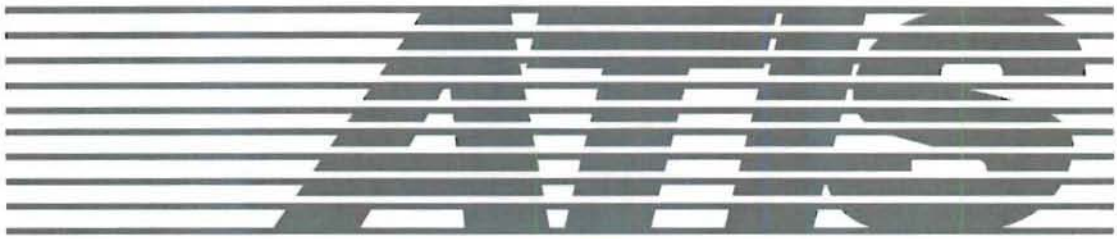
City | State/ Province | Zip Code

Remarks

For Single-line, Single-range, & Multi-line requests, fill in the fields below. Use the **Multi-line Number Portability Request Form** for additional lines.

Number Portability Quantity | Line Number ▲ | End Subscriber

Ported Telephone Number



Alliance for Telecommunications Industry Solutions

ATIS Standard

ATIS-0409001-0300

Wireless Intercarrier Communications Interface Specification (WICIS) for Local Number Portability Version 3.0.0

Section 3.3.2 includes select samples of populated WPRs, SPRs, and WPRRs. It is not the intent to provide a sample of every condition.

3.3.1 Wireless Port Request Record

The information on the Wireless Port Request record is populated by the NSP from either their own internal systems or through data entered directly into NICP. In the table below, the definition for the values in the "Type" column can be found in the Data Dictionary. The values for length are for the size of the field. The values in the "Use" column are "M" for mandatory, "C" for conditional and "O" for optional. The values for "Data Source" indicate the origin of the field. When "NSP" is specified as the Data Source, it is assumed that either the NSP's systems will generate the information fed to the NICP or the information will be manually entered into the NICP. When the Data Source is "SYSTEM", it is assumed that the NICP will generate the required information. For complete descriptions of the field attributes, please refer to the Data Dictionary.

Field	Description	Type	Length	Use	Data Source
WICIS_REL_NO	WICIS Release Number	N[+]	6	M	SYSTEM
NLSP	New Local Service Provider	AN	4	M	NSP
ONSP	Old Network Service Provider	AN	4	M	NSP
REQ_NO	Request Number	AN	16	M	SYSTEM
VER ID REQ	Version Identification for the Request	N	2	M	SYSTEM
SUP	Supplement Type	A[+]	1	C	NSP
NPDI	Number Portability Direction Indicator	A	1	M	NSP
RESP_NO	Response Number	AN	18	M	
NNSP	New Network Service Provider	AN	4	M	NSP
D/TSENT	Date and Time Sent	N	12	M	SYSTEM
DDD/T	Desired Due Date and Time	N	12	M	NSP
CHC	Coordinated Hot Cut	A	1	O	NSP
AGAUTH	Agency Authorization Status	A	1	M	NSP
DATED	Date of Agency Authorization	N	8	C	NSP
AUTHNM	Authorization Name	L7A[-]	60	C	NSP
GREQ_NO	Group Request Number	AN	16	O	NSP
INIT	Initiator Identification	L7A[-]	15	M	NSP or SYSTEM
IMPCON	Implementation Contact	L7A[-]	15	M	NSP
TEL NO (IMPCON)	Telephone Number for Implementation Contact	N[+]	17	M	NSP
BILLPREFIX	Billing Name Prefix	L7A[-]	10	O	NSP
BILLFIRSTNM	Billing First Name	L7A[-]	25	C	NSP
BILLMDINIT	Billing Middle Initial	L7A[-]	1	O	NSP
BILLLASTNM	Billing Last Name	L7A[-]	25	C	NSP
BILLSUFFIX	Billing Name Suffix	L7A[-]	10	O	NSP
BUSNM	Business Name	L7A[-]	60	C	NSP
BILLSTNUM	Billing Street Number	L7A[-]	10	C	NSP
BILLSTNM	Billing Street Name	L7A[-]	60	M	NSP
BILLSTDIR	Billing Street Directional	A	2	O	NSP

Field	Description	Type	Length	Use	Data Source
CITY	City	AN[+]	35	M	NSP
STATE	State/Province	A[+]	2	C	NSP
ZIP CODE	Zip Code	AN[+]	10	C	NSP
COUNTRY	Country	A	3	C	NSP
SSN/Tax ID	Social Security Number	N[+]	11	C	NSP
ACCT	Account Number	AN	20	C	NSP
PSWD/PIN	Password/PIN	L7A[-]	15	O	NSP
NPQTY	Number Portability Quantity	N	5	M	NSP
LNUM	Line Number (repeats)	N	5	M	SYSTEM
PORTED #	Porting Telephone Number (repeats)	N[+]	17	M	NSP
NAME	Name (repeats)	L7A[-]	60	O	NSP
REMARKS	Remarks	L7A	160	O	NSP
NRSELLNM	New Reseller Name	L7A[-]	20	C	NSP

3.3.2 Wireless Port Request Response Record

The Wireless Port Request Response record is used by the OSP to send a Confirm, Resolution Required or Delay Response back to the NSP. In the table below, when "OSP" is specified as the Data Source, it is assumed that the information will be manually entered into the OICP. When the Data Source is "OICP", it is assumed that the information is derived from the port Request, provided by the NSP. When the Data Source is "SYSTEM", it is assumed that the OICP will generate the required information. It is important to note that all Porting Telephone Numbers involved in the port be listed in the appropriate fields on the Port Response Record. For complete descriptions of the field attributes, please refer to the Data Dictionary.

Field	Description	Type	Length	Use	Data Source
WICIS_REL_NO	WICIS Release Number	N[+]	6	M	OICP
NNSP	New Network Service Provider	AN	4	M	OICP
OLSP	Old Local Service Provider	AN	4	M	OSP
ONSP	Old Network Service Provider	AN	4	M	OICP
REQ_NO	Request Number	AN	16	M	OICP
VER ID REQ	Version Identification for the Request	N	2	M	OICP
VER ID RESP	Version Identification for the Response	N	2	O	OICP
RT	Response Type	A	1	M	OSP
GRESP_NO	Group Response Number	AN	20	O	OSP
RESP_NO	Response Number	AN	18	M	SYSTEM
CD/TSENT	Confirmation Date and Time Sent	N	12	M	SYSTEM
REP	Representative	L7A[-]	15	M	OSP
TEL NO (REP)	Telephone Number for OSP's representative	N[+]	17	M	OSP