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October 23, 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 October 22, 2007, Susan Jin Davis and the undersigned of Comcast Corporation met separately with Ian Dillner, Legal Advisor to Chairman Martin, Scott Bergmann, Legal Advisor to Commissioner Adelstein, John Hunter, Chief of Staff to Commissioner Robert McDowell and Wayne Leighton, Legal Advisor to Commissioner Tate, in connection with Comcast's filing in the above-captioned proceeding. On October 23, 2007, Susan Jin Davis and the undersigned met with Scott Deutchman, Legal Advisor to Commissioner Copps, 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,

Cc: Ian Dillner
Scott Bergmann
John Hunter
Wayne Leighton
Scott Deutchman

- **The Importance of Efficient and Timely Number Porting to Consumers and Competition Has Increased With the Introduction of Competitive Bundled Offerings.**
 - A slow and ineffective number porting process can dramatically affect the consumer's experience and the continued development of competition in the residential voice market.
 - Comcast serves over three million customers with its Comcast Digital Voice (CDV) service, a substantial portion of whom port their numbers from other providers.
 - The majority of CDV customers subscribe to Comcast's triple play bundled package of CDV, video and high-speed Internet services. Number porting delays can make it difficult to deliver all three services to customers when they want them.
 - Customers increasingly desire self-installation kits to avoid the inconvenience of having to be home for a technician to install new service. A delay in the porting process represents a significant obstacle to creating a positive customer experience for self-installation of CDV service.

- **Reducing and Standardizing the Information That Porting-out Providers Can Require for Port Validation Will Expedite the Process and Enhance the Consumer's Experience.**
 - Comcast has made a substantial investment to develop and implement an automated electronic interface to submit port requests to the ILECs yet we have a 15-20% fallout requiring manual intervention.
 - A match on the telephone number, zip code, and customer account number is all that is necessary to identify the customer and prevent an inadvertent port.
 - The current practice increases the opportunity for error, delays the porting interval and often requires Comcast to reschedule the order, impacting the customer.
 - The porting-in carrier continues to bear the burden to ensure the *bona fides* of every porting request, pursuant to the Commission's rules.
 - The Commission should adopt a simple and uniform industry porting validation process that limits the number of criteria to those "necessary" to customer validation.

- **The Changes in the Market Warrant the Commission Revisiting the Wireline Porting Interval.**
 - The current wireline interval was established over 10 years ago, at the start of local competition. It is out of step with consumers and relies on outdated systems.
 - Technological advancements in systems and processes, the ease of porting in the wireless context, and the dramatic change in wireline competition exemplified by CDV's success warrant a re-examination of the current wireline interval.
 - Even in 2004 the NANC found that the four-day interval could easily be cut nearly in half at a relatively modest expense. Comcast supports a "next day" standard that, in most cases, would not exceed 36 hours.
 - The Commission previously sought comment on NANC's recommendation. Comcast urges the Commission to refresh the record in that proceeding and require NANC to perform a new cost/benefit analysis that accounts for consumer benefits from faster porting.