Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Telephone Number Requirements for IP-Enabled Service Providers	)	WC Docket No. 07-243
Local Number Portability Porting Interval and Validation Requirements	)	WC Docket No. 07-244
IP-Enabled Services	)	WC Docket No. 04-36
Telephone Number Portability	)	CC Docket No. 95-116
CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues	)	
Final Regulatory Flexibility Analysis	)	
Numbering Resource Optimization	)	CC Docket No. 99-200

COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation ("Sprint") submits these comments on the Petition for Clarification filed by One Communications Corp. ("One Communications") in response to the Commission's November 8, 2007, *LNP Validation Order*.[1] Sprint agrees with One Communications that there are "provisioning" fields, in addition to the four validation fields specified in the *Order*, which are needed to accomplish a port request. Sprint, however, disagrees with One Com-

[1] *See, In the Matter of Telephone Number Requirements for IP-Enable Service Provider*, WC Docket No. 07-243 *et al.*, One Communications Corp. Petition for Clarification and For Limited Waiver of Extension of Time (Feb. 5, 2008)("*Petition for Clarification*"). *See also Local Number Portability Porting Interval and Validation Requirements*, WC Docket No. 95-116, *Report and Order, Declaratory Ruling and Order on Remand*, FCC 07-188, 22 FCC Rcd 19531, 19553 ¶ 42 (Nov. 8, 2007)("*LNP Validation Order*"). One Communications' additional request for additional time to comply with the *Order* has become moot. *See LNP Extension Order*, CC Docket No. 95-116, FCC 08-31 (Feb. 5, 2008)(extending the compliance date for all carriers until July 31, 2008).

munications' suggestion that porting-out carriers should be given the flexibility to determine what additional "provisioning" fields are needed.

DISCUSSION

The Commission in its *Validation Order* determined that "LNP validation should be based on no more than four fields for simple ports."[2] One Communications asks the Commission to clarify that "while LNP validation is based on no more than four fields for simple ports, carriers may require information in addition to the four fields to accomplish a simple port."[3]

Sprint agrees with One Communications that additional fields are needed to accomplish the port. In fact, there is industry consensus that at least two additional "provisioning" fields are needed to accomplish a port: "the New Service Provider Identified (SPID) and the Desired Due Date."[4]

One Communications does not in its Petition identify the additional provisioning fields it thinks a porting-out carrier should be able to demand of porting-in carriers. One Communications does reference a recent Ordering and Billing Forum ("OBF") Simple Port Service Request ("SPSR") Preparation Guide, which identifies 10 "provisioning" fields in addition to the four validation fields that the Commission has authorized.[5]

There are at least three problems with this SPSR Guide. First, it includes fields that are not necessary for provisioning.[6] Second, compliance with the SPSR is voluntary – meaning that

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[2] *See, LNP Validation Order*, 22 FCC Rcd at 19532 ¶ 2. The four fields are: "1) 10-digit telephone number; (2) customer account number; (3) 5-digit zip code; and (4) pass code (if applicable)." *Id.*

[3] One Communications Petition at 2.

[4] *See* Letter from Local Number Portability Administration Working Group ("LNPA-WG) to North American Numbering Council ("NANC"), at 1 (Jan. 15, 2008). A diverse set of carriers "unanimously agreed" that these two additional fields are "necessary." *Id.* at 3.

[5] See One Communications Petition at 4-5 (emphasis in original).

[6] For example, the Guide would require porting-in carriers to include End User Listing Treatment in their port request. This information has no relevance to wireless carriers as mobile numbers are not published in directories.

wireline carriers that wish to add additional fields to make the porting process more burdensome would be free to do so. Indeed, Sprint understands that only two wireline carriers intend to use the SPSR. Third, Sprint, notes that the SPSR is limited to wireline-to-wireline ports. The Commission's *Declaratory Ruling*, however, stemmed from a Petition filed by T-Mobile and Sprint documenting problems with intermodal (wireline-to-wireless) porting. Industry-wide standards must also be created to address intermodal porting.

The Commission limited the number of validation fields to four because the record evidence demonstrated that some incumbent LECs required dozens of fields that had little or nothing to do with validation and that such "onerous port validation procedures are inconsistent with the Act and Commission precedent."[7] Grant of the One Communications Petition would enable incumbent LECs to undermine the *Validation Order*, by demanding unnecessary information so long as they characterized the data as "provisioning" rather than "validation" fields. A porting-out carrier that is losing a customer should not be able to determine unilaterally what information should be required for a port request – regardless of how that information is characterized.

It is essential that the Commission determine what "provisioning" fields are appropriate and not appropriate. As One Communications readily acknowledges, there is "disagreement within the industry as to what data is required to effectuate a simple port."[8] One Communications further recognizes that if the Commission does not intervene now, it will be required to intervene after the inevitable controversies arise.[9]

Sprint is not prepared, at this time, to suggest precisely what provisioning fields are necessary to accomplish a port. It recommends that the Commission seek public comment on

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7 *LNP Validation Order*, 22 FCC Rcd at 19554 ¶ 42.

8 One Communications Petition at 5.

9 *See id.* at 4.

this subject, either in response to the One Communications Petition or as part of the new rulemaking proceeding, WC Docket No. 07-244. Sprint does, however, offer the following guidelines: (1) the provisioning fields should be reduced to the fewest number necessary to accomplish the port between carriers; (2) to the extent feasible, these provisioning fields should be uniform across all types of ports including wireless-to-wireless, wireline-to-wireline, and intermodal; and, (3) the Old Service Provider (*i.e.*, the porting-out carrier) may not dictate or otherwise have any discretion to require the New Service Provider to provide additional fields.

Once the Commission identifies the set of "provisioning" fields that may be included in a port request, it can ask industry to develop implementing procedures and formats so the entire porting process can be standardized.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2008, a copy of the foregoing Comments of Sprint Nextel Corporation was sent by U.S. first-class mail, postage prepaid, to the parties listed below.

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