

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matters 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 QWEST COMMUNICATIONS CORPORATION**

Qwest Communications Corporation (“Qwest”) is the entity out of which Qwest offers its Voice over Internet Protocol (“VoIP”) services. In these comments, responsive to the Federal Communications Commission’s (“FCC” or “Commission”) *Notice of Proposed Rulemaking* (“*Notice*”),<sup>1</sup> Qwest focuses on but a single issue raised in the *Notice*: the extension of N11 code mandates,<sup>2</sup> with their concomitant deployment and routing costs, to interconnected VoIP

---

<sup>1</sup> *In the Matters of Telephone Number Requirements for IP-Enabled Services Providers; Local Number Portability Porting Interval And Validation Requirements; IP-Enabled Services; Telephone Number Portability; CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues; Final Regulatory Flexibility Analysis; Numbering Resource Optimization, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd 19531 (2007), Erratum, DA 08-290, rel. Feb. 4, 2008.*

<sup>2</sup> As the Commission has described “N11 codes are abbreviated dialing arrangements that enable callers to access special services by dialing only three digits. . . . [N]etwork[s] must be pre-programmed to translate the three-digit code into the appropriate seven- or ten-digit sequence and route the call accordingly.” *See Notice* at 19559 n.176.

providers. Qwest believes that neither the public interest nor the marketplace compel such an extension.

Unlike the N11s 911 and 711, which advance the public interest goals of protecting health and safety and creating accessible communications services, the remaining N11 codes are not so critical to the overall public welfare that the Commission needs to require interconnected VoIP providers to implement them. And the *Notice* raising the issue of requiring interconnected VoIP providers to deploy such N11 codes lacks any analysis as to how such a requirement would advance the public interest in any material way.<sup>3</sup>

In addition to the N11 codes 911 and 711, the Commission has assigned four national codes -- 211 (information and referral services), 311 (non-emergency police and other governmental services), 511 (travel and information services), and 811 (state “One call” notification services). Codes 411 (often used in connection with directory assistance) and 611 (sometimes used by local exchange carriers (“LEC”) for access to business offices or repair) are used by carriers locally but have not been assigned for national use by the Commission.<sup>4</sup>

Unlike LECs whose customers calling N11 codes are associated with a particular wire center and whose calls are routed to some pre-determined city, county or state N11 agency or private organization, an interconnected VoIP call currently lacks either a geographic wire center “locus” for N11 call origination or the predetermination of the public/private service provider termination. Moreover, any nomadic-VoIP N11 calling architecture would require that both the

---

<sup>3</sup> The *Notice* cites to comments of the Arizona Corporation Commission in connection with the mandated N11 for VoIP providers concept. Those comments, however, only pose the issue that the Arizona Commission believes the federal Commission should investigate whether or not N11 dialing should be extended to VoIP providers. *Id.*

<sup>4</sup> *Id.*

locus origination and the service provider termination be “flexible,” adding an additional layer of complexity to such dialing and routing.

In a wireline LEC world, any N11 deployment would most probably be accomplished using Advanced Intelligent Network (“AIN”) features. For example, a traditional N11 deployment “model” might look as follows:

1. N11 service provider contacts the LEC and requests routing to its 10-digit number, and specifies the geographic area in which this routing is to occur.
2. LEC sets up translation in its AIN database so that N11 calls from any wire center in the geographic area specified by the N11 service provider route to the local number.
3. When a N11 call is made, the Service Control Point (“SCP”) retrieves the pre-provisioned routing number for the involved N11 service and calling wire center and returns the routing information to the LEC switch, which then routes the call accordingly.

It is not self evident that this LEC-infrastructure model could be modified or adapted to the variety of VoIP platforms; or if it could be adapted that such an adaptation would extend to nomadic uses. Frankly, it is highly unlikely that such could be accomplished.

More likely the case would be that entirely new systems development, involving at a minimum geographic tables and routing guides, would have to be undertaken and crafted to accommodate various VoIP-type architectures before N11 offerings could be supported.<sup>5</sup> And these geographic and routing guides would become increasingly complex if nomadic N11 dialing were required.

---

<sup>5</sup> As the Commission has acknowledged, in order to accurately route and deliver N11 dialed calls, networks must “be pre-programmed to translate the three-digit code . . . and route the call accordingly.” *Id.* In a VoIP context, all of the “pre-programming” tasks would have to be aligned with VoIP network architectures and switches.

As the Commission is aware, nomadic VoIP deployments can be complex. Only recently Qwest was required to file for an extension of time to implement the Commission's 711-dialing and routing mandate *in a nomadic context* because no market/vendor solution currently exists to accomplish such routing.<sup>6</sup> And while Qwest has identified a vendor that is willing to work with it in deploying 711 in a nomadic environment, it knows of no vendor who is currently able to support the range of VoIP N11 dialing arrangements reflected in the *Notice*, particularly in a nomadic context.

But even if it were technically possible to route N11 calls nomadically, it is not clear that automatic N11 "routing" in a nomadic environment *should* route exactly the same as a 911 or a 711-dialed call. In those cases, the Commission's mandates have essentially required the dialing to conform to the customer's "last registered address," which should be either the home address or one associated with the physical presence of the VoIP customer in a different place (such as a different state or city). But it may not be the case that the customer wants an N11 call from a city in which she is transiently located to automatically route to a transient-geographic termination point.

For example, assume a customer of an interconnected VoIP provider has its "home" VoIP service in Denver; and she is currently traveling for a time in California; *and* she has changed her registered address to reflect her California stay (her "E911 registered address" obligation). If she dials 811 (Call Before You Dig) in a nomadic context, one would assume her call would be routed to the California-811 supported code, at least based on the 911 and 711 calling/routing models. *But what if this customer really wanted to talk with the Denver call-to-dig persons because her crew was going to be digging at Denver sites the following week?* If one imagines

---

<sup>6</sup> See Qwest Petition for Extension of Time, filed Mar. 7, 2008, Erratum, filed Mar. 18, 2008.

the complexity of creating a “simple” geographic routing call table for nomadic N11, creating one that would also toggle between customer preferences becomes significantly more complicated.

And with each “variation on a theme,” the design, development and deployment costs of N11 keep getting larger and larger. It seems obvious that the interconnected-VoIP-industry costs of creating N11-call dialing and routing architectures would not be trivial. This is all the more true because interconnected VoIP providers reflect a variety of new and burgeoning technologies supported by a range of business, network, and infrastructure models. Qwest believes that no public interest case can be demonstrated to support such a material cost burden.

In addition to the general challenge of dealing with “nomadic customers” in the context of an N11 deployment, there is an additional challenge. While it is true that some N11 codes other than 911 and 711 have been assigned by the Commission for “national use,” the codes are physically deployed locally (for example, county by county). For example, in Arizona, Qwest has deployed 311 in two different contexts (*i.e.*, in different counties), and 511 has two deployments (Phoenix Metro and the rest of the state). Similarly, in Colorado 211 has **12 deployments**; in Idaho 311 has four deployments, and so on. On the other hand, a variety of Qwest states have not even pursued a 311 deployment. It is clear, then, that demand is variable and unpredictable.

Moreover, even if the wireline-LEC architecture could somehow be modified to support interconnected VoIP providers, it is Qwest’s belief that the current LIDB databases are not sufficiently dynamic to support nomadic interconnected VoIP uses. To support N11s in such a context, we believe an entirely new database or registry would have to be created adding additional costs to such a regulatory regime.

For all the above reasons, the Commission should determine that it is not in the public interest, at this time, to require interconnected VoIP providers to deploy N11 codes.

Respectfully submitted,

QWEST COMMUNICATIONS  
CORPORATION

By: /s/ Kathryn Marie Krause  
Craig J. Brown  
Kathryn Marie Krause  
Suite 950  
607 14th Street, N.W.  
Washington, DC 20005  
(303) 383-6651

Its Attorneys

March 24, 2008

## CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **COMMENTS OF QWEST COMMUNICATIONS CORPORATION** to be: 1) filed with the FCC via its Electronic Comment Filing System in WC Docket Nos. 07-243, 07-244 and CC Docket No. 95-116; 2) served via e-mail on the Competition Policy Division, Wireline Competition Bureau at [cpdcopies@fcc.gov](mailto:cpdcopies@fcc.gov); and 3) served via e-mail on the FCC's duplicating contractor Best Copy and Printing, Inc. at [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com).

/s/Richard Grozier

March 24, 2008