Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Requirements for IP-Enabled Services 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 VERIZON WIRELESS

Verizon Wireless hereby submits its comments in response to the November 8, 2007, Notice of Proposed Rulemaking ("*NPRM*") regarding local number portability.[1] Verizon Wireless appreciates this opportunity to comment on ways to improve the LNP process so that consumers may have an unfettered choice among competitive carriers.

Once a customer has entered into an agreement with their new carrier to port their number and appropriate customer information is obtained, the porting process consists of many tasks: generation and transmission of port requests, verification of proper message structure, validation of the end user/porting customer, confirmation of the port, and

[1] Telephone Number Requirements for IP-Enabled Service Providers, *Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking*, 22 FCC Rcd. 19531 (2007).

activation in the Number Portability Administration Center (NPAC) database. Within these tasks are multiple steps that must be completed. However, for purposes of these comments, there are two major steps of the intermodal porting process that require improvement – though not necessarily along the lines suggested by the *NPRM*. Those two steps are: 1) the one-day LSR submission and Firm Order Confirmation (FOC) return process and 2) the three-day port implementation process.

Verizon Wireless believes that the type of standardization and industry consensus that drives the intramodal wireless porting process illustrates what the FCC should seek to accomplish in this proceeding.[2] That does not necessarily mean shortening the intermodal porting interval for implementing simple ports from three business days to forty-eight hours. The problem is not the three days when carriers are faithful to that timeframe. The tighter forty-eight hour deadline may not necessarily improve the process for both the old service provider (OSP) and the new service provider (NSP); both carriers may legitimately need the time to, respectively, disconnect the customer's service in the OSP's systems and to execute the port in the NPAC and the NSP's systems. It does mean, however, requiring OSPs to comply with the existing standard of three business days or less following the return of the FOC. Some carriers take much longer than three days to disconnect service by imposing their own business rules that delay and hinder the porting process. By removing the ability of OSPs to essentially lengthen the existing three-day porting implementation process, the Commission will actually shorten the overall porting process to a reasonable time frame for intermodal ports. Instead of adopting a rule to change the interval for implementing simple ports from three business

[2] In the Wireless to Wireless Intramodal porting process, a standard implementation of the OBF Wireless Intercarrier Communication Interface Specifications (WICIS) is used by all Wireless providers.

days, first the Commission should require carriers to actually meet the terms of the existing interval.

Another needed improvement is tightening the process of evaluating the LSR and returning the FOC.[3] Today, carriers should return the FOC or deny the port request within twenty-four hours of receiving the LSR. A policy that allows the OSP to take up to twenty-four hours to merely reject the LSR adds unnecessary delay to the process. A deficient LSR should be obvious in much less than twenty-four hours. The time spent waiting for a response before the OSP even begins to work on implementing the port could be used to re-submit a corrected or more complete LSR and begin the process anew much quicker. Verizon Wireless understands that accepting a port <u>and</u> returning the FOC could reasonably take the full twenty-four hours.[4] However, rejecting a port should occur much faster.

Verizon Wireless does not, however, believe that carriers should be required to identify all errors possible in a given LSR and describe the basis for rejection when rejecting a port request.[5] This requirement is not necessary to shorten the process – it may actually have the opposite effect. Moreover, there are technical concerns with such a requirement because wireline carrier operating support systems (OSS) cannot process requests that fail to provide or which contain inaccurate information pertaining to key fields. Getting the rejection out often facilitates communication between the OSP and NSP, for which a speedy rejection is key. The complaints in the industry have not centered as much around the grounds for the rejected LSRs, but around the timing, especially when obtaining the FOC is the gating process before you even get to the actual

---

[3] This process occurs even before the clock starts on the three-day porting interval.
[4] The FCC should require carriers to adhere to the twenty-four hour FOC return timeframe as an outer limit. Currently, some carriers are also evading this timer with self-imposed business rules.
[5] *NPRM* at ¶57.

port implementation. By attacking the process in both places, the FCC can strike a reasonable balance without unduly imposing huge new burdens on industry that may have unintended consequences.

The *NPRM* seeks comment on how the information required for the four validation fields adopted in the *Declaratory Ruling* affects the validation process.[6] The FCC should answer any lingering questions regarding whether the four validation fields limits the amount of information that can be requested to accomplish a port, as distinguished from the information allowed to validate the port request. Given the Order's positive comments and references to the example of the wireless intramodal porting process, as well as the specific language of the order, Verizon Wireless believes that the Commission has not limited the information that can be exchanged to accomplish porting to just the four enumerated fields.[7] Although the four validation fields are adequate for validating a port request from a customer, that information is wholly inadequate for processing a port in carriers' systems and would dramatically increase the fallout, slowing the porting process. Moreover, the wholesale changes to carriers' automated systems to accommodate such a change would require more time than allotted – even with the current extension of time.

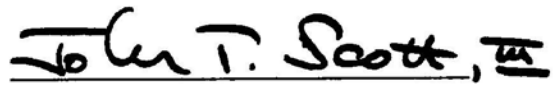
The industry is moving forward to tighten its processes in the aftermath of the Commission's order, which is a positive development. For example, the ATIS OBF is educating the industry about the order and is working with industry to revise industry guidelines to enhance compliance with any new rules. The OBF LSOP, for instance, has developed and recommended a new simple port process for wireline carriers, the Simple

---

[6] *NPRM* at ¶56.
[7] *NPRM* at ¶¶ 42-48.

Port Service Request (SPSR), in compliance with the *Declaratory Ruling*.[8] If widely adopted by wireline carriers as an adequate and helpful substitute for their carrier-specific LSRs, the new SPSR could begin to help standardize the wireline porting process. In addition, wireline and wireless carriers are working together to standardize intermodal porting by identifying those fields that are necessary to accomplish intermodal porting.

Respectfully submitted,
Verizon Wireless



By: John T. Scott, III
Vice President and
Deputy General Counsel – Regulatory Law

Lolita D. Forbes
Counsel

1300 I Street, N.W.
Suite 400 West
Washington, D.C. 20005
(202) 589-3740

March 24, 2007

[8] The SPSR attempts to identify those fields that are necessary to provision most wireline-to-wireline simple ports.