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REDACTED FOR PUBLIC INSPECTION

March 24, 2008

FILED/ACCEPTED
MAR 2 4 2008
Federal Communications Commission
Office of the Secretary

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

RE: In the Matter Of Local Number Portability Porting Interval and Validation Requirements, WC Docket No. 07-244

Dear Ms. Dortch:

Enclosed for filing please find Verizon's Redacted Comments in the above referenced docket. Some of the materials in this filing contain confidential information. We are filing herewith the appropriate number of copies of the public version of the filing. In addition, we are serving the appropriate FCC staff with this filing.

Please date-stamp the extra copy of this letter and return it to the individual delivering this package.

All inquiries relating to access to any confidential information submitted in this filing should be addressed to the undersigned.

Thank you for your assistance in this matter.

Sincerely,

Mark J. Montano

Encl.

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REDACTED FOR PUBLIC INSPECTION

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

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Federal Communications Commission
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In the Matter of	)	
	)	
Local Number Portability Porting Interval and Validation Requirements	)	WC Docket No. 07-244
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COMMENTS OF VERIZON

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Of Counsel

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Dated: March 24, 2008

Counsel for Verizon

REDACTED FOR PUBLIC INSPECTION

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

In the Matter of	)	
	)	
Local Number Portability Porting Interval and Validation Requirements	)	WC Docket No. 07-244
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COMMENTS OF VERIZON[1]

The Commission's recently released Order takes a significant step in simplifying the process by which numbers are ported from one provider to another.[2] It would be premature for the Commission to take further steps to shorten the porting interval since the *Order* will not be effective until this summer and there is no evidence that porting-in carriers would actually be able to port numbers within a shorter period. Rather, the Commission should enforce the existing standard interval. While Verizon rigorously adheres to the standard interval and completes nearly all port requests it receives on time regardless of the due date selected, many cable companies and competing carriers do not permit porting-in providers to select due dates within the standard interval or do not meet the standard interval's timing requirements. Accordingly, to ensure that all providers are playing by the same rules and to establish parity between directly competing providers, the Commission should take steps to ensure that the cable companies and other competing carriers comply with today's standard interval.

1 The Verizon companies participating in this filing ("Verizon") are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

2 Report and Order, Declaratory Ruling, Order on Remand ("*Order*"), and Notice of Proposed Rulemaking ("*Notice*"), 22 FCC Rcd 19,531 (Nov. 8, 2007).

In the *Order*, the Commission specified which particular fields to validate a customer would be allowed on a provider's Local Service Request (LSR) form. This standardization should lower the rate at which LSRs are rejected for containing immaterial discrepancies from the old providers' customer records and thus reduce the average time it takes for a number to be ported. Verizon is spending a considerable sum to revise its LSR and to re-code its operating systems to ensure that it has a fully tested process in place by the *Order*'s effective date of July 31, 2008.

Along with the *Order*, the Commission issued the *Notice* that tentatively concluded that the standard interval[3] for simple ports should be reduced to 48 hours.[4] Because the *Order* has yet to take effect, there is no basis to conclude that the current requirements will prove ineffective at minimizing the porting difficulties that the Commission's *Order* sought to remedy. Until it can make such a finding, the Commission should refrain from taking further steps to improve the LNP process other than enforcing its existing requirements.

The Commission's tentative conclusion cannot be supported by any evidence that the benefits outweigh the substantial costs to providers. Four years ago, the Commission considered

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[3] The current standard interval is set forth in the NANC flows that were approved by the Commission. The old provider must "complete the LSR/FOC exchange *within 24 hours* and complete the port *within three business days* thereafter." Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, *Telephone Number Portability*, 18 FCC Rcd 23,697 ¶ 46 n.117 (2003) (emphasis added); *see also* 47 CFR § 52.26 and NANC recommendations referred to therein.

[4] As a threshold matter, it is unclear from the *Notice* whether the Commission has tentatively concluded that the entire process – i.e., the FOC return *and* the port – should take place within 48 hours or whether the 48-hour clock starts after the return of the FOC. Currently, under the industry standard, the three day window for completing a port starts *after* the return of the FOC. Since in the vast majority of cases, Verizon returns the FOC within two hours, there is no material difference. However, almost 10% of simple port LSRs submitted to Verizon do not flow through and require manual intervention. In those situations, Verizon may need up to 24 hours to return the FOC. If both the FOC return and the port must occur within 48 hours, there would be only 24 hours for the port to occur when the LSR does not flow through. Since this may not be enough time to ensure an error-free number port, the return of the FOC should continue to be the starting point of any reduced interval.

this same issue, but wisely took no action. Nothing has changed since that time that would support the Commission adopting a shortened interval today. A shortened standard interval would have little effect on porting intervals as only around 5% of LSRs submitted to Verizon set due dates within the standard interval. Moreover, the Commission could effectively shorten the period for numbers to be ported by enforcing the current standard three-day porting interval and 24-hour FOC return interval against providers that maintain non-compliant business rules. In addition, the Commission should require *all* providers to return FOCs within 24 hours. There appears to be little consumer benefit from shortening the standard interval to justify the considerable costs on providers, including Verizon, that have high volumes of port-outs and must meet state-specific, on-time porting metrics.

Nevertheless, if the Commission ultimately concludes that the standard interval should be shortened, the considerable implementation costs should be recoverable by providers who have just spent funds to implement the latest *Order*. Finally, the standard interval should continue to be measured in *business* days, rather than in a certain number of hours as proposed by the Commission.

I. CABLE COMPANIES AND OTHER COMPETING PROVIDERS TYPICALLY SELECT DUE DATES OUTSIDE TODAY'S STANDARD INTERVAL.

The Commission's *Notice* refers to comments previously filed in this docket that "shorter intervals are possible." *Id.* ¶ 62. Theoretically, shorter intervals may be "possible," but today only around 5% of LSRs that Verizon receives from porting-in providers set due dates on the first available date. *See* Declaration of Beth Abesamis (*Abesamis Decl.*) ¶ 3 (Attach. A). And over 10% of due dates that are within the standard interval are later extended by the new provider. *Id.* ¶ 9. Thus, any claimed benefits to consumers and competition from a shorter standard interval do not exist in practice.

Cable companies have asserted the need for a shorter standard interval to facilitate customer switches from ILECs to new facilities-based VoIP providers, thus promoting competition.[5] Yet Verizon's data show that cable providers rarely set a due date to take advantage of the current three business day post-FOC standard interval. For example, in New Jersey, Comcast submitted nearly **[Begin Proprietary]** **[End Proprietary]** simple port LSRs to Verizon in 2007. *Abesamis Decl.* ¶ 5. Only **[Begin Proprietary]** **[End Proprietary]** of those LSRs set a due date within three business days. *Id.* By contrast, **[Begin Proprietary]** **[End Proprietary]** of Comcast's LSRs set a due date seven days or more later. *Id.* In Pennsylvania and Massachusetts, two other states where Comcast ported numbers on behalf of a large number of prior Verizon customers, around **[Begin Proprietary]** **[End Proprietary]** of Comcast's LSRs set a due date seven days or more later. *Id.* Other cable providers, including Bright House and Time Warner Cable, select due dates in a similar manner. *Id.* ¶¶ 6-8. Moreover, cable providers regularly submit "sups" to Verizon to extend the due date that was initially selected.[6]

Cable companies set due dates longer than the standard interval to complete work prior to establishing service to the customer. In many cases, cable companies must arrange for a mutually convenient date with the customer for the cable company to visit the customer's premises to add or modify on-site equipment. Self-installation kits or any other technological advancements cannot substitute for a customer visit in many circumstances. In any event, competition among voice providers is thriving even with the typical request by the *porting-in*

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5 *See, e.g.*, Comcast Comments, CC Docket No. 95-116, at 3-5 (Feb. 8, 2007) ("Thus, it is plain that a slow and ineffective number porting process can throw grit into the gears of the entire competitive process . . . .").

6 Indeed, cable providers submitted "sups" to Verizon to extend the due date more than twice as often as other providers in January 2008 in Verizon East territory. *See Abesamis Decl.* ¶ 10.

provider for longer than the standard interval, a practice that would not be affected by the Commission's shortening the standard interval.

II. THE COMMISSION'S CURRENT STANDARD INTERVAL IS NOT BEING MET BY COMPETING PROVIDERS.

The current standard interval is not being met for two different reasons. First, many providers' business rules require the porting-in provider to select a due date outside the standard interval and allow themselves more than 24 hours to return the FOC. Second, many providers with compliant business rules still do not meet the requirement to return a FOC within 24 hours. The Commission should take steps to end these practices and make clear that all directly competing providers must play by the same rules.

A. Competing Voice Providers' Business Rules Require a Lengthier Interval.

Few ports today occur within the standard interval due to the widespread failure of porting-out providers to allow such due dates to be selected. When Verizon wins new customers and seeks to port their numbers to Verizon, its attempts to take advantage of the standard interval are often stymied by the porting-out providers' business rules that permit the old provider to take more than the standard 24 hours to return the FOC (or reject the LSR) and/or require Verizon to select a due date further out than the standard three business days post-FOC.

According to some providers' business rules, they may take as long as three days to respond to the LSR with a FOC or reject rather than comply with the current 24-hour standard interval. For example, Global Crossing allows for three business days, and Cavalier and One Communications allow for up to 48 hours.[7] Cable providers, such as RCN and Bright House,

[7] *See* Global Crossing Business Rules for the CSR and LSR Process at 3 (Attach. B); Cavalier Telephone Mid Atlantic Region at 12 (Attach. C); One Communications ePort Handbook at 6 (Attach. D).

have similar business rules that allow 48 hours or two business days, respectively, for a response.[8]

Similarly, a number of providers have business rules that require more than the three day standard interval for completing a port. For instance, Cavalier requires due dates to be six or more business days out[9] while One Communications and Global Crossing require due dates to be five or more days from the submission of the LSR.[10] As before, cable providers are no more compliant than traditional CLECs: RCN and Bright House both require a due date to be five business days out.[11]

In a number of cases, the due date of a customer's port is delayed by both components of the porting interval. In other words, for Verizon to port a customer from Cavalier, Verizon has to submit a LSR with a minimum *eight* business days due date (i.e., two days for the FOC plus six days for the interval), which is twice as long as the standard interval (i.e., 24 hours for the FOC plus three business days) .

Verizon has repeatedly raised this issue with the offending providers and in fact, has recently sent cease-and-desist letters to many providers. However, to date, these providers have not revised their business rules. Because shortening the standard interval would not affect this conduct, the Commission should begin enforcing the standard interval as it exists today.[12]

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8 *See* RCN Local Number Portability Inter Carrier Procedures at 4 (Attach. E); Bright House Networks Information Services LNP Ordering Methods & Procedures at 2 (Attach. F).

9 *See* Cavalier Telephone Mid Atlantic Region at 8.

10 *See* Global Crossing Business Rules for the CSR and LSR Process at 3; One Communications ePort Handbook at 7.

11 *See* RCN Local Number Portability Inter Carrier Procedures at 4; Bright House Networks Information Services LNP Ordering Methods & Procedures at 2.

12 Parity is also necessary in the exchange of Customer Service Records (CSRs), which providers often need to access prior to submitting port requests. Because providers have varied business rules with respect to the release of CSRs, some ports may be delayed for this reason. The Commission should require that CSRs be returned the same day if a request is submitted

B. Competing Voice Providers' On-Time Performance Is Sub-Standard.

In addition, many providers fail to return the FOC in a timely manner upon receipt of a valid LSR from Verizon. From March 1 - September 30, 2007, only 40% of FOCs were returned to Verizon within the 24-hour response timeframe. *See* Declaration of Donna Terrio ¶ 3 (Attach. G). Only 48 providers out of over 200 met the 24 hour timeframe 80% of the time or more. *Id.* For all of 2007, the average time for a FOC to be returned to Verizon was over 40 hours. *Id.*

These delays occur even when a provider's business rules provide for the return of the FOC within the required 24 hours. For instance, in 2007, Verizon submitted to Cablevision over **[Begin Proprietary]** **[End Proprietary]** LSRs to port a number. *Id.* ¶ 5. Less than **[Begin Proprietary]** **[End Proprietary]** of those LSRs resulted in Cablevision submitting a FOC to Verizon within 24 hours. *Id.* The average return time for all FOCs from Cablevision was close to **[Begin Proprietary]** **[End Proprietary]** hours. *Id.* Comcast's performance was similar as it returned only around **[Begin Proprietary]** **[End Proprietary]** of its FOCs to Verizon within 24 hours. *Id.* ¶ 6.

The reasons for these delays vary. Some providers' backlogs have been as long as two weeks at times and can take months to fully resolve. Moreover, some providers creatively interpret the standard interval for returning FOCs. At least one provider believes that it can divide the 24-hour standard interval by 8-hour business days, thus effectively creating a 72-hour interval for itself to return a FOC.

Such delays not only inconvenience the customer, but also have important business consequences to Verizon. The customer may mistakenly blame Verizon for the delay and then cancel its pending order of services from Verizon. In addition, some states require the

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before noon and by noon of the next business day if a request is submitted after noon. Such a requirement would be consistent with rules already in place in a number of states, including New York and Pennsylvania. *See, e.g.*, New York Public Service Commission, Case 00-C-0188, "End User Migration Guidelines: CLEC to CLEC: Phase II" (June 2002), at 12.

submission of metrics showing the percentage of time that new service is provisioned within a certain timeframe. In New York, that time period is five business days following the customer's order.[13] Verizon may fail to meet these state requirements and thus potentially be subject to additional regulatory requirements – through no fault of its own – when ports are regularly delayed by the old provider not complying with the standard interval.

Verizon has tried to resolve the FOC response time issue directly with providers and more recently, through cease-and-desist letters. To date, these discussions have failed to make a difference. Yet these providers still expect Verizon to meet the standard interval – and it does in nearly all cases – when the providers port numbers from Verizon. Enforcement of the current standard interval is therefore necessary to benefit customers and level the playing field.

III. THE COSTS TO CHANGE VERIZON'S SYSTEMS TO COMPLY WITH A REDUCED STANDARD INTERVAL ARE CONSIDERABLE.

In 2004, Verizon commented on a proposal to reduce the standard interval for intermodal ports to 53 hours and estimated that it would have to spend over $10 million to make the necessary changes.[14] Although the Commission is not distinguishing between intermodal and intramodal ports here (except for wireless-to-wireless), the cost of reducing the standard interval to 48 hours today is roughly the same. Verizon would have to modify many of its automated order processing systems. Costs to modify networks, switches, and software would be incurred in primarily two areas.

As a first step, Verizon would have to improve flow through rates for simple ports. Simple ports fall out for many reasons, including problems with database reconciliation,

[13] *See* 16 NYCRR § 603.3(e). Because Verizon is concerned about its ability to consistently meet the five day period due to the time required to implement number ports, particularly when porting out providers do not comply with the applicable intervals, Verizon is currently seeking a ruling in New York that this rule does not apply to customers won back from facilities-based providers.

[14] *See* Verizon's Reply Comments, CC Docket No. 95-116, at 3-5 (Dec. 17, 2004).

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inventory, and switch translation. Manual processing may be necessary both upon receipt of the LSR and after the FOC is submitted. In order to ensure that Verizon could meet a required porting interval of 48 hours, Verizon would have to achieve a flow through rate close to 100% so that there is little manual handling of orders that fall out. Nevertheless, even with enhancements to flow through, some small percentage of orders would still fall out. Verizon would have to modify existing manual processes and program systems to readily identify any "fall out" associated with porting orders subject to a 48-hour interval and process them on an expedited basis. In addition, Verizon would have to hire additional personnel and conduct additional training.

Second, assuming that state commissions modified their metrics to conform to a 48-hour interval, Verizon would have to upgrade its metric control systems to account for the new, shorter porting interval. States require Verizon and other carriers to meet certain performance metrics, and the systems in Verizon's national marketing centers are geared to meeting those metrics. Several major software upgrades would be required to capture Verizon's performance under a new porting interval and to process the interval data that the front end systems transmit.

These significant costs to a provider that currently complies with the standard interval, when compared to the consumer benefits discussed above, make clear that the Commission should refrain from altering the standard interval. If the Commission decides to shorten the porting interval anyway, providers must be allowed to recover their costs. As explained in the *Cost Classification Order*[15] and the *BellSouth LNP Order,*[16] carriers may recover their LNP

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15 Memorandum Opinion and Order, *Telephone Number Portability Cost Classification Proceeding*, 13 FCC Rcd 24,495 (1998), *aff'd*, Memorandum Opinion and Order on Reconsideration and Order on Application for Review, *Telephone Number Portability*, 17 FCC Rcd 2578 (2002).

16 Order, *BellSouth Corp. Petition for Declaratory Ruling and/or Waiver*, 19 FCC Rcd 6800, ¶¶ 10, 18 n.74 (2004).

costs, provided that such costs would not have been incurred "but for" the implementation of LNP and such costs were in fact incurred for the provision of LNP. Here, providers would not have incurred network and labor costs to shorten the porting interval but for local number portability requirements, and these costs should therefore be recoverable.

IV. THE STANDARD INTERVAL SHOULD CONTINUE TO BE MEASURED IN BUSINESS DAYS.

Finally, if the Commission decides to reduce the standard interval, the standard interval should continue to be measured in *business days* – rather than hours. Currently, a valid LSR submitted at 11:15 pm on Monday could select a due date no earlier than Friday as the standard interval clock would not start until the opening of business on Tuesday morning. In comparison, under the Commission's tentative conclusion, that same LSR could set a due date and time as early as 11:15 pm on Wednesday. Thus, a standard interval measured in hours would require Verizon to employ staff that is specially trained to deal with LSRs that fall out of the automated process around-the-clock, every day of the year. That cost is not accounted for in the cost estimate above.

In addition, measuring the standard interval in business *days* would reduce the risk of customers being left without service. For all porting out residential and small business customers in its East territory, Verizon disconnects the customer's service at 11:59 pm on the due date selected by the new provider, whether or not the new service provider has effected the number port. If the new service provider fails to effect the change of service for whatever reason and fails to cancel the original request to cancel service, the customer would lose telephone service. If the same process were followed such that the old provider would disconnect customers' service at the 48-hour mark, the new provider must activate number ports every hour, 24 times a day. This is obviously more prone to error than an interval that requires the new provider to schedule activation just once per day for all of its porting-in customers.

V. CONCLUSION

The Commission should evaluate the efficacy of its *Order* before issuing potentially burdensome additional requirements that have no appreciable effect on consumers or competition. Enforcement of the current standard interval to establish parity between directly competing providers should take place first.

Respectfully submitted,

By: ______________________

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703.351.3058

Of Counsel
Michael E. Glover

Counsel for Verizon

Dated: March 24, 2008

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ATTACHMENT A

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of Local Number Portability Porting Interval and Validation Requirements	WC Docket No. 07-244

DECLARATION OF BETH ABESAMIS

1. My name is Beth Abesamis. My business address is 35 Fourth Avenue Bay Shore, New York. I have been employed by the Verizon companies and their predecessor companies since 1981. I am Director, Network Operations with primary responsibility for regulatory support relating to dealings with competing local exchange carriers (CLECs). In my prior position as Director, Metrics Policy and Planning, I was responsible for the negotiation, implementation, and management of Verizon's ordering and provisioning "metrics" – that is, the statistical monitoring of Verizon's performance in all aspects of its relationships with CLECs.

2. The purpose of this Declaration is to address the due dates that providers select when submitting Local Service Requests (LSRs) for simple ports to Verizon. In particular, I demonstrate that Verizon regularly receives simple port LSRs that set a due date beyond the three business day post-FOC standard interval.

3. I have examined data reflecting the simple port LSRs submitted to Verizon by all competitive providers in 2007. The following chart shows the requested due date interval and the percentage of requests for that interval:

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Requested Interval (days)	Verizon East[1]	Verizon West
3 or less	5%	3%
4	8%	7%
5	13%	6%
6	15%	10%
7 or more	58%	74%

4. I have also reviewed data pertaining to the simple port LSRs submitted by cable providers Comcast, Time Warner Cable, and Bright House in 2007. The data reveal that these three cable providers rarely set due dates of three days or less in their LSRs.

5. For example, in New Jersey, Comcast submitted nearly **[Begin Proprietary]** **[End Proprietary]** simple port LSRs to Verizon in 2007. Only **[Begin Proprietary]** **[End Proprietary]** of those LSRs set a due date within three business days. By contrast, **[Begin Proprietary]** **[End Proprietary]** of Comcast's LSRs set a due date seven days or more later. In Pennsylvania and Massachusetts, two other states where Comcast ported numbers on behalf of a large number of prior Verizon customers, around **[Begin Proprietary]** **[End Proprietary]** of Comcast's LSRs set a due date seven days or more later.

6. Similarly, Bright House, which operates solely in Florida, requested a due date within three business days on **[Begin Proprietary]** **[End Proprietary]** of its simple port LSRs in 2007. By contrast, Bright House requested due dates seven days or more later **[Begin Proprietary]** **[End Proprietary]** of the time.

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[1] Verizon East consists of the 14 former Bell-Atlantic jurisdictions. Verizon West comprises the rest of Verizon's jurisdictions.

7. Time Warner Cable selects its due dates in a comparable manner, although Verizon has less data on which to judge Time Warner Cable's practice. I understand that Time Warner Cable's LSRs are submitted by Sprint and may not identify Time Warner Cable as the requesting provider.

8. Therefore, I examined data reflecting Sprint's requested due dates. In New York, where Time Warner Cable has a large presence, the data is the most robust. Out of **[Begin Proprietary]** **[End Proprietary]** LSRs submitted by Sprint in 2007, over **[Begin Proprietary]** **[End Proprietary]** of those set a due date seven days or more later. A mere **[Begin Proprietary]** **[End Proprietary]** set a due date within three business days.

9. Finally, I collected data for the few LSRs received by Verizon that sought to complete the port within three business days. The percentage of those LSRs that were "supped" or supplemented by the new provider to extend the due date were as follows for the past three months: 12% in December 2007; 10% in January 2008; and 11% in February.

10. The data I gathered also revealed that for Verizon East territory in January 2008 cable providers submitted "sups" to extend the due date on nearly 15% of their LSRs. By contrast, non-cable providers "supped" the due date on only 6% of their LSRs.

11. This concludes my Declaration.

I, Beth Abesamis, declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Beth Abesamis

Beth Abesamis

Date: March 24, 2008

ATTACHMENT B

Global Crossing™

Business Rules for the CSR and LSR Process

Customer Service Record Process

The below data elements are required for the CSR process:

CSR Administrative Section
- Date Sent (automatically filled in)
- Type of Service

Contact Section
- Company: requesting companies name (auto populated)
- Address: requesting companies address (auto populated)
- Initiator Name: requestor's name (auto populated)
- Email: requestor's email address (auto populated)
- Contact Phone: requestor's phone number (auto populated)
- Fax: requestor's fax number (auto populated)

Customer Location (End User)
- LOA Obtained: Yes or No
    - Please note: Requesting Company must have an LOA on file to obtain a CSR
- Customer Name: end user name
- End User Vendor Name: end user's current provider's name
- Service Address: end user's service address
- City
- State
- Zip Code

Service Number
- BTN: end user's billing telephone number
    - Please note: Only 1 BTN per CSR request
    - The ability to put in ranges of numbers is now available.

CSR Process General Rules

- Please note all responses to CSR requests will be given via the Global Crossing Web Portal under CSR Status.
- CSR status will only be visible when logged into the Global Crossing Web Portal using the ID that initiated the CSR
- Standard interval is 72 hrs.

LSR Process

The below data elements are required for the LSR process:

LSR (Local Service Request)

- PON NUMBER
- VER: should start with 00 and change with any supplements
- SUP: cancel, due date change, other
- REQTYP: (should be CB-tn#s only)
- D/T SENT: date and time sent (auto populated)
- CCNA: 3 digit alpha company code
- NNSP: new service provider code
- ATN: this should be the account main billing telephone number (not necessarily a telephone number that is being ported)
- DDD: desired due date
    - Must be 5 days out from submission date
    - No Support for Port Outs requested after 5 pm EST.
    - No Support for Port Outs on Fridays (see escalations for ports on Fridays)
- NPDI: C = wireline to wireless D = wireline to wireline
- ACT: V = full migration P = partial migration
- TOS: 1 = Business 2 = Residential
- RTR: always C
- AUTH DATE: date on LOA
- AGAUTH:
    - Y = yes letter of authorization on file
    - N = no letter of authorization on file
- AUTHNM: name of customer who authorized the conversion/signed the LOA

Contact Section

- INIT: LEC or CLEC representative contact name (auto populated)
- TEL NO: contact telephone number (auto populated)
- EMAIL: contact email address (auto populated)
- FAX NO: contact fax number (auto populated)

Remarks

- Any special instructions please list here

LOCATION AND ACCESS
- CUST NAME: end users name
- SERVICE ADDRESS: end user's physical location
- CITY: end user's city
- STATE: end user's state
- ZIP: end user's zip code

Disconnect Information
- List numbers that are to be disconnected at time of port

Service Details
- ANIs BEING PORTED (all should appear active in our billing system for the LSR to be valid)

Status
- PENDING: LSR is submitted to Global Crossing
    - Note: You cannot sup from this status
- FOC: LSR is clean and a FOC # and date are given
- Reject: LSR is not clean and will need to be updated or canceled
- Complete: Numbers on the LSR have
    - Ported successfully to the gaining provider and removed from Global Crossing switches and translations
- Cancel: LSR has been canceled by either Global Crossing or the gaining provider

LSR Process General Rules:
- Please request a CSR prior to submitting your LSR to ensure accurate information is submitted.
- Global Crossing has 72 business hours to respond. Any order received after 3PM EST will start on the next business day.
- All due dates must be no less than 5 business days from submission of LSR.
- For Large ports of 500+ please allow additional time for response.
- Ports only include Telephone numbers riding on Global Crossing network. Loops cannot be ported or identified on FOC.
- Resold lines will have to be submitted to the NPA/NXX owner and not to Global Crossing.

Frequently Asked Questions

Q: What are Global Crossing's hours of operation?
A: Global Crossing's business hours are Monday-Friday 8:00am-5:00pm Eastern Time.

Q: Will I receive any sort of confirmation email of fax relative to the status of my CSR or LSR request?
A: You will not receive any email or fax updates on your request. All updates are made and statuses will be found within the Global Crossing Web Portal.

Q: Why can I not see the status of a request in the portal?
A: Only the user ID that initiated the request can see the request status. The only way to see updates on requests will be to log into the Global Crossing Web Portal under the user id that submitted the order and query the PON. Your status will change from pending to FOC, Rejected, Completed, Canceled, etc. in the portal itself.

Q: What do I do if I need concurrence?
A: Global Crossing does not give concurrence to port requests. It is the responsibility of the gaining provider to place subscriptions into NPAC within the 18 hour concurrence cycle prior to the FOC/Port date. If you have a concurrence request, we do not accept them unless special circumstances exist and GC did not provide FOC in a timely manner.

Q: How long do I have to port the number after the FOC date?
A: Gaining providers have five (5) business days to port a number after FOC date. If you have not ported within 5 days of the FOC date your FOC will be revoked, your order will be cancelled, and you will have to issue an new LSR

Q: How many supplements can I issue?
A: Global Crossing only allows for three (3) supplements prior to canceling your order

Q: If I do not see the status change on my request in the Global Crossing Portal where can I call to inquire about my request?
A: You may call the Global Crossing CLEC Status Line at 800-896-1111 if you feel your request has not been responded to in a timely enough manner. Be sure to leave all relevant information on the message you leave here including PON and WTN.

Please note that this line will go to voicemail and your request will be picked up by the next available provisioner who will look into that status of your request and update it accordingly in the Global Crossing Portal. You will not get a callback as a result of messages left on this number; however, your request will be worked as quickly as possible so please watch for a change in status in the portal.

Q: What do I do if I have an out of service issue or other issue that requires immediate attention?
A: Consult the Contact/Escalation Process and begin at Level 3

Contact/Escalation Process

The below escalation matrix should be used for all inquiries. Please allow four (4) hours for investigation and response prior to moving to the next level in the escalation process.

Contact Level	Description	Notes
General Status	Global Crossing Portal (http://tradingpartners.globalcrossing.com/)	All CSR and LSR responses will be updated within the portal. Please check here first for updates.
1st Level	CSR/Port Out Status line (800-896-1111)	Call here for status if no response was posted to the web portal within 48 business hours of submittal or your last supplement
2nd Level	Danielle Carr – Team Lead CLEC Provisioning	585-255-1194 Danielle.Carr@globalcrossing.com
3rd Level	Matthew Mereau – Manager CLEC Provisioning	585-255-1044 Matthew.Mereau@globalcrossing.com
4th Level	Karen Scott – Director Order Validation and CLEC Services	585-255-1188 Karen.Scott@globalcrossing.com
5th Level	Kurt Utzman – Head of Global Order Validation, CLEC Services, and Billing Operations	585-255-1207 Kurt.Utzman@globalcrossing.com

Business Hours are Monday-Friday 8:00am-5:00pm Eastern Time

Note: For customer out of service issues or other issues or requested due dates less than five (5) business days out please start at 2nd Level in the Escalation Matrix

ATTACHMENT C