

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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

**REPLY COMMENTS OF CABLEVISION LIGHTPATH, INC.**

Cablevision Lightpath, Inc. (“Cablevision”) submits the following reply comments in accord with the Federal Communications Commission (“FCC” or “Commission”) notice of proposed rulemaking (“NPRM”) in the above-captioned proceeding.<sup>1/</sup> As a certified competitive local exchange carrier (“CLEC”) in the states of Connecticut, New Jersey, and New York, Cablevision Lightpath is regularly involved in porting customer numbers to other carriers and in receiving ports of numbers from other carriers.

**INTRODUCTION**

Cablevision applauds the Commission’s efforts to streamline the number porting process. The prompt and efficient transfer of numbers is vitally important if consumers are to receive the full benefit of competition in telecommunications markets. As the Commission has affirmed, “it is critical that customers be able to port their telephone

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<sup>1/</sup> *Telephone Number Requirements for IP Enabled Services Providers*, WC Docket No. 07-243, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd. 19531, ¶¶ 52-66 (2007) (“*LNP NPRM*”).

numbers in an efficient manner in order for LNP to fulfill its promise” of allowing consumers to take advantage of the competitive options available to them.<sup>2/</sup>

**I. Decreasing the Porting Interval and Improving LSR Error Correction Procedures Would Increase the Efficiency of the Porting Process for the Benefit of Consumers**

Cablevision agrees with the Commission’s tentative conclusion, subject to a reasonable transition period, that the porting interval for simple ports should be shortened to 48 hours. Generally, consumers desire flexibility in the times available to them for initiating service; shorter porting intervals provide this greater flexibility. There are also virtually no technological barriers to implementing shorter porting intervals.<sup>3/</sup> Consumers derive no benefit from longer porting intervals,<sup>4/</sup> and may become frustrated by delays. Aside from consumer convenience, shorter porting times protect competition by limiting opportunities for customers’ existing carriers to interfere with the customers’ decision to change providers.<sup>5/</sup>

Cablevision also agrees with the Commission’s and commenters’ recommendation to require carriers rejecting Local Service Requests (“LSRs”) to identify all known errors upon initial rejection of the LSR and to sufficiently describe the basis for such rejections.<sup>6/</sup> Carriers submitting LSRs should not be required to guess at the

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<sup>2/</sup> *LNP NPRM* ¶ 54.

<sup>3/</sup> *See, e.g.*, Charter Communications Comments at 4; Comcast Comments at 9; National Association of Regulatory Utility Commissioners Comments at 5-6; Sprint Nextel Comments at 31; T-Mobile USA Comments at 8-9.

<sup>4/</sup> NCTA Comments at 3.

<sup>5/</sup> NCTA Comments at 3; Charter Communications Comments at 3.

<sup>6/</sup> *See LNP NPRM* ¶ 57; Charter Communications Comments at 4-6; MetroPCS Communications Comments at 3-4; One Communications Comments at 5-6; Public Utilities Commission of Ohio Comments at 4; RCN Telecom Services Comments at 7-8; Sprint Nextel Comments at 12-13; Time Warner Cable Comments at 4; T-Mobile USA

basis for rejection or to go through multiple rounds of LSR submissions to determine all errors an LSR might contain. Multiple-round error correction processes are not only unfair to the submitting carrier; they also inconvenience customers whose port may be delayed as a result.

The fact that some carriers may request due dates outside the current standard porting interval provides no basis to maintain the status quo. Carriers have many reasons for requesting longer-than-standard porting intervals, including a customer's request for more time and ensuring enough time to complete all the processes required to port customers. In fact, Verizon has requested longer porting intervals from Cablevision presumably based on customer requests or Verizon's operational needs. Providers can always agree to longer intervals among themselves through standard course of dealing. But carriers, ILECs in particular, would be far less likely to agree to shorter porting intervals because shorter porting intervals permit competitors to initiate service to customers faster. The Commission should therefore enable providers to initiate service to their customers faster by reducing existing porting intervals.

**II. Verizon's Claim that Cablevision Fails to Adhere to Existing Porting Intervals Is False and Should Not Serve as a Basis upon which to Maintain Existing Porting Intervals**

Verizon's suggestion that Cablevision does not comply with current porting intervals is false and misleading. Verizon singles out Cablevision among several "competing voice providers" as an example of a company that "fail[s] to return the [Firm Order Confirmations] FOC in a timely manner upon receipt of a valid LSR from

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Comments at 6. *But see* Alliance for Telecommunications Industry Solutions Comments at 9-10 (opposing the requirement); Verizon Wireless Comments at 3 (same).

Verizon.”<sup>7/</sup> In support of its claim, Verizon provides a general summary of data purporting to show that Cablevision did not return FOCs timely sometime in 2007.<sup>8/</sup>

Cablevision takes very seriously its responsibility to port out numbers. Since a policy update in April 2007, Cablevision has been providing FOC dates within 24 hours and implementing ports on a 3-business day or better rule for all valid Verizon port requests containing a Desired Due Date (“DDD”) (other than same day requests). Cablevision also implemented an automated port-out system that ensures that a FOC date is returned within 24 hours and that ports are fulfilled within the proper interval.

Verizon’s suggestion that it has escalated concerns about porting intervals to Cablevision is similarly false. Verizon’s self-serving and nonspecific March 19, 2008 cease-and-desist letter to Cablevision was nothing but an eleventh hour attempt to create a false record. In response to Verizon’s letter, Cablevision attached its current Porting Guidelines & Escalation Matrix reflecting a three business day porting interval.<sup>9/</sup> In fact, since implementing its automated system over a year ago, Cablevision’s operational performance has been exceptional. Except for routine issues that may arise in the normal course of porting (such as rejects and port jeopardies based on errors in keying port requests or similar errors), Cablevision has no record of any complaint from Verizon regarding any porting delays.<sup>10/</sup> And Cablevision’s records show that since April 2007

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<sup>7/</sup> Verizon Comments at 7.

<sup>8/</sup> Verizon Comments at 7.

<sup>9/</sup> For the Commission’s information, Cablevision attaches its March 26, 2008 response to Verizon’s cease-and-desist letter. *See* Exhibit A, attached.

<sup>10/</sup> Cablevision maintains a well-established complaint and issue escalation process that it makes available to porting carriers. The process provides for escalation of a complaint or issue to as high as the vice presidential level within twenty-four hours of a

Cablevision consistently meets the twenty-four hour standard for FOC returns and complies with the three-day porting interval unless a different DDD is requested by the other carrier. Indeed, Verizon never actually claims that Cablevision operationally misses requested porting intervals. Thus, in evaluating the need for shorter porting intervals, the Commission should ignore Verizon's claims regarding any systematic or continuing porting delays caused by Cablevision.

**CONCLUSION**

Cablevision appreciates the opportunity to provide the Commission with the comments and information expressed above.

Respectfully submitted,

**CABLEVISION LIGHTPATH, INC.**

Elana Shapochnikov  
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*/s/ Michael H. Pryor*  
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Its Attorneys

Dated: April 21, 2008

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porting problem or issue first surfacing. See Cablevision Porting Guidelines Escalation Matrix included in Exhibit A.

**EXHIBIT A**

**Cablevision Response Letter  
March 26, 2008**



**AMY GROVEMAN**  
Vice President, Law  
Cable and Communications

March 26, 2008

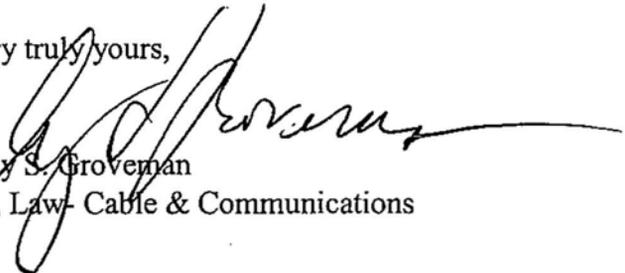
**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Joshua E. Swift, Esq.  
Assistant General Counsel  
Verizon  
1515 North Court House Road, Suite 500  
Arlington, Virginia 22201-2909

Dear Mr. Swift:

We are in receipt of your March 19, 2008 letter regarding Cablevision's compliance with federal porting requirements. Cablevision's operational policy is to provide a FOC date within 24 hours and to fulfill standard port orders within 3 business days from the date of a valid submission. Further, we strongly disagree with Verizon's mischaracterization that Cablevision "systematically" fails to comply with relevant porting requirements. Cablevision works regularly with Verizon operational personnel to ensure proper porting. Should Verizon take issue with Cablevision's porting processes, we ask that you escalate such matters through the normal business channels. In addition, we refer you to Cablevision's current Porting Guidelines and Escalation Matrix, attached, which reflect our operational policy.

Very truly yours,



Amy S. Groveman  
VP, Law- Cable & Communications

Cc: Michael Olsen, Esq.  
Elana Shapochnikov, Esq.

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CABLEVISION SYSTEMS CORPORATION  
1111 Stewart Avenue, Bethpage NY 11714-3581  
516 803-2556 Fax 516 803-2575  
agrovema@cablevision.com

## Cablevision – Porting Guidelines and Escalation Matrix

### Porting Intervals

Request Type	Interval	E-mail Address	Phone
Customer Service Record Inquiry (CSR)	24 Hours (Business days)	<a href="mailto:portouts@cablevision.com">portouts@cablevision.com</a>	516-803-6020
Local Service Request Submission (LSR) *	24 Hours (Business days)	<a href="mailto:portouts@cablevision.com">portouts@cablevision.com</a>	516-803-6020

#### \* Due Date Intervals

Standard porting interval is 3 business days from date of valid submission

#### Activations and End-User Disconnects

Customer phone service will not be disconnected until port activation has been verified.

Port orders will be cancelled automatically 7 days past the negotiated Firm Order Confirmation (FOC) date if no cancel or supplement request is submitted.

#### Snapback Requests

Cancel request need to be submitted to [portouts@cablevision.com](mailto:portouts@cablevision.com) prior to reinstatement of service. A new Local Service Request will need to be initiated.

#### End user requests to cancel pending port out

Cablevision will respond to the LSR request via email advising of the cancel request, in addition, will place the port in conflict in NPAC.

#### Long Distance Service and Directory Listings

Customers must address the disposition of long-distance services with their new Local Service Provider (LSP). These services will be disconnected upon port out from Optimum Voice.

Customers must address maintenance of any Directory Listing information with their new LSP. Directory Listings will be removed upon port out from Optimum Voice.

#### Standard Operating Hours

Monday – Saturday: 8am – 8pm ET

Sunday: 8am – 7pm ET

\*\* Escalations outside normal business hours should be directed to the "Mobile" numbers listed for Manager and Director level contacts.

### Escalation Contacts

Level	Name	Role	E-mail Address	Phone	Elapsed Time
1	Cablevision Port Out Department	Operations Team / General Inquiry	<a href="mailto:portouts@cablevision.com">portouts@cablevision.com</a>	516-803-6020	Initial Requests
2	Julius Han	Supervisor – OV Referral Desk (Port Outs / Escalations)	<a href="mailto:jhan@cablevision.com">jhan@cablevision.com</a>	Desk: 516-803-8886 Hotline: 516-803-4086	1 hour from initial escalation
	Fabrice Salomon	Supervisor – OV Referral Desk (Port Outs / Escalations)	<a href="mailto:fsalomon@cablevision.com">fsalomon@cablevision.com</a>	Desk: 516-803-6991 Hotline: 516-803-4086	1 hour from initial escalation
3	Erin Hanlon	Manager – OV Referral Desk (Port Outs / Escalations)	<a href="mailto:ehanlon@cablevision.com">ehanlon@cablevision.com</a>	Office: 516-803-2149 ** Mobile: 516-851-5311	2 hours from initial escalation
	Robert Price	Manager – LNP Operations	<a href="mailto:rprice2@cablevision.com">rprice2@cablevision.com</a>	Office: 516-803-6908 ** Mobile: 516-717-7661	2 hours from initial escalation
4	William Baird	Director – OV Service Delivery & Fulfillment	<a href="mailto:wbaird@cablevision.com">wbaird@cablevision.com</a>	Office: 516-803-6202 ** Mobile: 516-805-6188	4 hours from initial escalation
5	Ashok Kuthyar	Vice President – OV Operations	<a href="mailto:akuthyar@cablevision.com">akuthyar@cablevision.com</a>	Office: 516-803-2318	24 hours from initial escalation

## CERTIFICATE OF SERVICE

I, Ernest C. Cooper, hereby certify that on this 21st day of April 2008, the foregoing Reply Comments of Cablevision Lightpath, Inc., were filed electronically through the FCC's Electronic Comments Filing System (ECFS) and copies were served on the following as indicated:

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