

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

FILED/ACCEPTED
APR 21 2008
Federal Communications Commission
Office of the Secretary

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

REPLY COMMENTS OF COMCAST CORPORATION

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April 21, 2008

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REPLY COMMENTS OF COMCAST CORPORATION

Comcast Corporation and its affiliates (“Comcast”) hereby submit this reply to the comments submitted in response to the Notice of Proposed Rulemaking (“*Notice*”) released last year in the above-captioned proceeding.¹

¹ *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket Nos. 07-243, 07-244, & 04-36, CC Docket Nos. 95-116 & 99-200, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd 19531 (2007). The term “*Order*” refers to the Report and Order, Declaratory Ruling, and Order on Remand, and the term “*Notice*” refers to the Notice of Proposed Rulemaking. Unless otherwise indicated, all Comments cited herein were filed in WC Docket No. 07-244 on March 24, 2008.

I. INTRODUCTION AND SUMMARY

The initial comments of Comcast and other parties participating in this proceeding emphasize that the overriding goal of the Commission's rules governing the local number porting ("LNP") process should be to ensure that consumers are able to change wireline voice providers while retaining their numbers quickly, easily, and efficiently. To that end, the record shows broad support for reducing the standard interval for porting a telephone number in connection with a simple port between wireline voice service providers. Although there are some minor differences among the specific proposals advanced in the comments, there is widespread agreement that the current four-day standard should be replaced by a shorter interval of approximately 48 hours. There is no reason why consumers should wait four days – or longer – to port their wireline number when they can port their wireless number in a matter of hours.² For that reason, Comcast and other commenters support reducing the standard interval for simple ports to two days for providers that do not offer electronically bonded arrangements and to one day for providers that do offer such arrangements.

Electronically bonded ("e-bonded") providers today are able to port numbers within a much shorter timeframe than non-e-bonded providers.³ E-bonded carriers employ near

² Moreover, when the current interval was developed, it may have been assumed that competition would develop from providers that collocate facilities in an incumbent carrier's end office. In that circumstance, porting an incumbent's customer would be more time consuming because it would require technicians to enter the end office and move the cross-wire from the incumbent's facilities to the competing provider's facilities. That infrastructure model is not widely used today, especially by providers of residential voice service.

³ As Comcast indicated in its initial comments, the computer-to-computer interface established by e-bonding is distinct from a graphical user interface ("GUI"), which exists between a computer and a user. Although e-bonding solutions may incorporate GUIs, the two are not the same. Comcast Comments at 5-6 n.9. Accordingly, Comcast herein uses

real-time electronic interfaces that allow the exchange of porting-related information virtually automatically. Although the development of effective e-bonding solutions can present difficult technical problems, once implemented they substantially streamline the number porting process.

In addition to reducing the standard porting interval, the Commission also should adopt the following additional reforms to improve the number porting process for simple ports:

- Make clear that the Commission's rules governing simple number ports apply to all interconnected voice providers;
- Require providers to identify all errors when a Local Service Request ("LSR") is initially submitted, rather than serially;
- Require providers affirmatively to notify other providers of changes to their porting requirements and processes;
- Prohibit porting-out providers from disconnecting service until receipt of the Number Portability Administration Center ("NPAC") activation notice to ensure continuous service and ongoing access to 911 emergency services;
- Clarify that the Commission's rules apply to simple ports between voice providers whether or not they have entered into an interconnection agreement; and
- Reject requests for reconsideration of the Commission's initial reforms to the number porting process, particularly the requirement that only four fields may be specified for the customer validation for simple ports.

II. ARGUMENT

A. The Commission Should Promptly Adopt Additional Reforms to Streamline the Local Number Porting Process for Consumers

1. There Is Consensus that the Commission Should Shorten the Standard Interval for Wireline-to-Wireline Ports

A broad cross-section of industry participants agree with Comcast that the standard interval for simple wireline-to-wireline ports can and should be shortened.

the term "e-bonded" to refer to providers that use a computer-to-computer interface established by e-bonding to port numbers, and the term "non-e-bonded" to refer to providers that use a GUI or other manual processes to port numbers.

Although individual proposals vary to some degree, with a few exceptions, the commenters generally support reductions that would produce a standard interval (48-53 hours) that approximates the two-day interval proposed by the Commission.⁴ In addition, Comcast and two state regulatory commenters urge the Commission to establish a separate one-day standard interval for simple wireline-to-wireline ports by e-bonded carriers. As demonstrated below, the record provides ample support for the adoption of a two-day interval, as proposed by the Commission, for ports by non-e-bonded carriers and a one-day interval for ports by e-bonded carriers.

Proposed Porting Interval for Non-Electronically-Bonded Carriers. Comcast proposed in its comments that the Commission establish a standard two-day porting interval for simple ports by non-electronically-bonded wireline voice providers.⁵ Charter Communications similarly urges the Commission to adopt a 48-hour interval, noting that the existing four-day standard interval is outdated, that current technologies and processes will support the shorter standard interval, and, most importantly, that competition and consumer expectations are best served by a reduced standard interval.⁶ Time Warner Cable likewise confirms that “the marketplace and technology have

⁴ Some providers also ask the Commission to establish additional standard intervals for the completion of different steps (*e.g.*, “confirmation” and “activation”) in the porting process. AT&T Comments at 6. As Comcast and other parties stress in their initial comments, the focus of the Commission’s simple porting rules should be the consumer’s interests. From their perspective, the paramount concern should be the standard interval in which the port will be completed.

⁵ Comcast Comments at 7-10. Comcast further urged the Commission to adopt a schedule for gradually reducing the interval for manually-processed port requests from two days to one day within two years. *Id.* at 9-10. The standard porting interval establishes the time frame for completing a simple port absent a consumer request for a longer interval. Providers, of course, also could mutually agree to a shorter interval.

⁶ Charter Comments at 2-4.

changed considerably, making a shorter [48-hour] interval not only feasible but essential to the continued development of a competitive market for voice services.”⁷

Other commenters, including incumbent local exchange carriers (“LECs”), support reducing the standard interval for wireline-to-wireline ports to between 48 and 53 hours. AT&T, for example, states that the Commission’s recent streamlining of the validation process “could establish a sound case for reducing the current simple porting interval to a total of 49 hours, *i.e.*, a one hour confirmation interval followed by a 48 hour activation interval.”⁸ Embarq urges the Commission “[a]t a minimum . . . [to] give the industry the flexibility to select a cost effective solution that is within the range of 48 hours to 53 hours.”⁹ As Time Warner Cable notes, “incumbent LECs endorsed the 2004 proposal by the North American Numbering Council (‘NANC’) to adopt a 53-hour maximum porting interval, and that was *before* the Commission streamlined the LNP validation process to include only four fields for simple ports.”¹⁰

Several state regulatory commissions similarly recognize the consumer benefits of an efficient and speedy porting process and support shortening the standard interval for simple ports between wireline providers. The California Public Utilities Commission and the People of the State of California (“CPUC”), for example, urge the Commission to shorten the current four-day interval to 48 hours “because shorter porting intervals benefit

⁷ Time Warner Cable Comments at 2.

⁸ AT&T Comments at 6. AT&T appears to assume that any reduced interval would apply only to simple ports that are “electronically submitted (e.g., electronic bonding, web GUI), [but] not fax [or] free-form email.” *Id.*, Attachment A at 1.

⁹ Embarq Comments at 11.

¹⁰ Time Warner Cable Comments at 3 (emphasis in original); *see also* National Cable & Telecommunications Association Comments at 3 (supporting 48-hour standard interval).

customers and promote competitive choice.”¹¹ The Nebraska Public Service Commission recommends that “the 48 hours suggested by the Commission should be considered the *ceiling* with perhaps the wireless interval to serve as the goal by which all porting intervals should be achieved regardless of modality.”¹² The Public Utilities Commission of Ohio (“PUCO”) “agrees with the FCC that porting intervals for simple wireline-to-wireline and intermodal ports, including ports to or from interconnected VoIP providers, should also be reduced.”¹³

There is some disagreement in the record regarding how the standard interval for simple ports should be measured. Charter urges the Commission to use calendar days in specifying the interval.¹⁴ Verizon, in contrast, contends that business day is the appropriate standard.¹⁵ Other commenters refer generally to a two-day or 48-hour interval without reference to calendar or business days.

Proponents of the calendar-day standard stress the pro-consumer, pro-competitive benefits of that standard because it would allow the porting process to operate continuously (save for recognized holidays).¹⁶ Comcast agrees that the benefits to consumers of using a calendar-day interval are substantial and supports the adoption of the calendar-day standard. This interval enables consumers to port their numbers more

¹¹ CPUC Comments, WC Docket No. 07-243, at 10.

¹² Nebraska PSC Comments at 3-4 (emphasis added).

¹³ PUCO Comments at 6 (supporting FCC’s tentative conclusion to reduce standard interval to 48 hours).

¹⁴ Charter Comments at 2-3.

¹⁵ Verizon Comments (Redacted Version) at 10.

¹⁶ See Charter Comments at 2-4; see also MetroPCS Comments at 7 (proposing that, for any interval of 12 hours or more, “the relevant interval be calculated on a 24-hour basis (*i.e.*, not business hours).”).

quickly and allows for weekend service installations when many consumers have free time from work. Further, as voice service self-installation becomes more common, consumers will be able to port their numbers and install their voice service themselves at their own convenience, any day of the week. The Commission, therefore, should adopt Charter's proposal to use calendar days in establishing standard porting intervals.

Proposed Porting Interval for Electronically-Bonded Carriers. Comcast recommends that the Commission establish a separate interval for simple ports by wireline providers that have implemented electronic bonding arrangements. Comcast, specifically, proposed in its initial comments that the Commission require e-bonded providers to comply with a one-day standard porting interval. Under that proposal, (i) a port request received between 7 a.m. and 3 p.m. local time on Day 1 could be activated on the next day after 12:01 a.m.; and (ii) a port request received after 3 p.m. local time on Day 1 could be activated after 12:01 a.m. on Day 3.¹⁷

Two other commenters that distinguished between e-bonded and non-e-bonded carriers, the National Association of State Regulatory Commissions ("NARUC") and Connecticut Department of Public Utility Control ("CTDPUC"), also support shortened standard intervals for e-bonded carriers. NARUC states that "implementation of electronic interfaces makes it technically feasible to complete simple ports between wireline-service providers on a next-day basis," and where "a port request is submitted by electronic interface, there is no reason to allow a longer period."¹⁸ NARUC accordingly passed a resolution last year urging the FCC to establish a one-day interval for simple

¹⁷ Comcast Comments at 7.

¹⁸ NARUC Comments at 6.

ports by e-bonded carriers.¹⁹ The CTDPUC confirms that “the use of electronic interfaces has made it technically feasible to complete simple ports between wireline service providers on a next-day basis,” and further recommends that the Commission take steps ultimately to reduce to one day the porting interval for requests submitted by e-bonded carriers.²⁰

For the reasons discussed above with respect to the desirability of a calendar-day standard for porting intervals for non-e-bonded carriers, Comcast similarly supports a calendar-day standard for the porting interval for e-bonded carriers. Consumers should not be denied the convenience of weekend installations by those service providers who desire to accommodate their customer’s schedules.²¹

Proponents of Status Quo. Verizon argues that there is no need to shorten the interval, primarily because consumers “rarely” request a due date that takes advantage of the current four-day standard interval.²² Verizon in effect proposes to set the standard interval based on the fact that some consumers would be satisfied with the *status quo*. In Comcast’s view, the Commission should set the standard interval based on the shortest, reasonably achievable interval in order to offer “consumers as quick and efficient a

¹⁹ *Id.* at 2.

²⁰ CTDPUC Comments, WC Docket No. 07-243, at 4 (March 24, 2008, filed April 1, 2008) (“[A]t a minimum, the porting interval for simple ports [should] be initially reduced to 48 hours and eventually to a one business day interval when requested by electronic interface.”); *see also* Sprint Nextel Comments at 31 (proposing a phased-in approach that initially would reduce the porting interval to 24 hours).

²¹ Of course, in order to establish a one-day standard interval for e-bonded providers, the Commission would also need to shorten the existing 24-hour interval for returning a Firm Order Confirmation (“FOC”) upon receipt of a valid port request.

²² Verizon Comments (Redacted Version) at 3-5.

porting process as possible.”²³ Consumers may of course select the porting interval that best suits their needs, but those consumers who prefer a shorter interval should be allowed to obtain it.

Moreover, the Verizon proposal ignores the industry trend toward consumer self-installation of voice service. As Comcast has pointed out previously in this proceeding, consumers are increasingly using the convenience of self-installation kits to change voice providers, and it is expected that this trend will become even more pronounced in the future, as additional plug-and-play devices are introduced.²⁴ Customers that purchase a self-installation kit for phone service, however, expect that they will be able to purchase a kit today and have their old telephone number work with their new service provider by, at a minimum, the next day. This requires that consumers be able to request and obtain porting of their number within one day.²⁵

Embarq and AT&T submit proposals that would needlessly complicate or delay the implementation of a shorter standard interval for simple wireline ports. Embarq contends that the FCC should tie any shortened interval to a requirement that providers comply with the number portability flows adopted by NANC, or, in the alternative,

²³ Notice ¶ 65.

²⁴ Comcast Comments, CC Docket No. 95-116, at 5 (Feb. 8, 2007); *see also* Time Warner Cable Comments at 4 (“cable operators are developing plug-and-play devices that should obviate the need for extended installation intervals”).

²⁵ Verizon also claims that in 2007 Comcast and other competitors frequently did not return FOCs to Verizon in a timely manner. Verizon Comments (Redacted Version) at 7. It is not clear from Verizon’s comments precisely how it determined Comcast’s FOC performance in 2007. Comcast performed its own survey of its timeliness in providing FOCs to Verizon for numbers ported in 2008 within the Verizon-East and Verizon-West service areas. Comcast’s data indicate that it returned more than 95% of its FOCs to Verizon by the end of the next business day after receiving a valid request from Verizon.

permit providers to apply a “principal of reciprocity.” Specifically, “if a carrier regularly takes more than 48 hours to port a number to Embarq there is no reason that Embarq should be held to a different standard when porting numbers to that carrier.”²⁶

Comcast supports use of the NANC flows, and will continue to do so as long as they are in keeping with then-current Commission rules and orders. Embarq’s alternative self-help proposal, however, would essentially require consumers to accept delays in the porting of their numbers because of an asserted dispute between the providers regarding their respective compliance with the Commission’s rules. On its face, the Embarq proposal would appear to permit a wireline provider to delay the porting of all simple ports to another provider if the former unilaterally determined that the latter provider had failed timely to port out a single number. If a wireline voice provider concluded that another wireline provider repeatedly failed to comply with the standard interval for simple ports, it should seek appropriate relief through a proceeding at the FCC. It would make no sense in these circumstances to penalize consumers who wish to change voice providers.

The FCC likewise should reject AT&T’s proposal to delay adoption of a shorter standard interval for simple wireline-to-wireline ports until the Commission receives input from the NANC.²⁷ As AT&T acknowledges, the NANC has previously provided guidance to the Commission on the issue of porting intervals.²⁸ The Commission subsequently reviewed the NANC’s input, and properly determined that these issues should be addressed in the pending proceeding rather than through industry fora that

²⁶ Embarq Comments at 11.

²⁷ AT&T Comments at 6-7.

²⁸ *Id.* at 6.

cannot dictate requirements but rather must rely on consensus.²⁹ All parties will have an opportunity to opine on the merits of a particular proposed porting interval in this proceeding. No public interest purpose would be served by AT&T's proposal that the FCC effectively obtain "sign off" from the NANC prior to adopting final rules.³⁰

Finally, several rural carriers and their associations oppose shortening the standard porting interval for simple wireline ports on the grounds that it would require substantial, costly improvements to their systems for processing port requests.³¹ These commenters generally contend that they currently rely on manual processing for handling simple port requests and would have to install expensive automated equipment in order to meet the shortened standard interval.

One commenter, the Minnesota Independent Coalition, offers a compromise proposal to address the circumstances of rural carriers. Specifically, the Coalition recommends that rural providers be allowed to comply with the shorter of the following two intervals: (1) two business days; or (2) the service interval that the rural company has established to provision new local service to its own customers when no field dispatch is required.³² Under this approach, the FCC could require rural incumbent LECs to submit annual filings certifying that they will provision simple port requests within the shorter of the two intervals and identifying the standard interval in which the incumbent

²⁹ *Accord* Sprint Nextel Comments at 17-20 (arguing that Commission action is necessary because the industry will never reach consensus on a reduced porting interval where incumbent wireline carriers lose 97 customers for every three customers gained from intermodal ports).

³⁰ Nor, as the CPUC points out, is there any need for further "refreshing of the record" on this point. CPUC Comments at 10.

³¹ Minnesota Independent Coalition Comments at 1; ITTA Comments at 2-3; OPASTCO/WTA Comments at 1-2; Windstream Comments at 2-3.

³² Minnesota Independent Coalition Comments at 1, 3.

LEC provisions local service to a new customer (where no truck roll is required). The Commission and competitors could then rely upon these annual certifications to assess compliance and to ensure that rural consumers, like their urban counterparts, are able to switch providers and benefit from voice competition without experiencing undue delays.

2. The Commission Should Make Clear that the Rules Governing Simple Number Ports Apply to All Interconnected Voice Providers

As Comcast indicated in its comments, it has repeatedly encountered other providers of voice service that claim not to be bound by the Commission's established porting requirements.³³ In Comcast's experience, competitive LECs frequently establish intervals for simple number ports that exceed the four-day requirement. Comcast thus requests that the Commission confirm that its porting rules apply to all providers, not just incumbent LECs.³⁴ Other commenters request similar clarification. Many of these same providers further urge the Commission to take more aggressive steps to ensure compliance with existing porting rules.

NARUC, for example, urges the Commission "to clarify all of its porting requirements, including maximum intervals, apply *uniformly* to ALL interconnected voice providers, including VoIP," in order to prevent these providers from "delaying or effectively blocking customer access to new providers."³⁵ Other commenters confirm that they have encountered problems similar to those experienced by Comcast, including carriers that attempt to rely on business rules or other internally-generated documents to avoid compliance with standard porting intervals. Verizon, for example, complains that

³³ Comcast Comments at 5, 14-15.

³⁴ *Id.*

³⁵ NARUC Comments at 4 (emphasis in original).

“a number of providers have business rules that require more than the three day standard interval for completing a port.” In one instance, the provider requires “due dates to be six or more business days out,” while in the other, due dates must “be five or more days from the submission of the LSR.”³⁶ To deter these and other blatant violations of the Commission’s porting rules, the Commission promptly should clarify that its existing and any newly adopted porting requirements, including standard porting intervals, apply to all interconnected voice providers.

3. The FCC Should Require Providers to Identify All Errors in an LSR When It Is Initially Submitted, Rather Than Serially

Comcast applauds the Commission’s decision to limit to four the number of customer validation fields that may be required for a port request. Comcast also agrees with other commenters that the FCC should adopt its tentative conclusion and require providers to identify all errors in an LSR at once.³⁷ As the Commission recognizes in its *Notice*, permitting porting-out providers to identify errors one at a time “necessitates multiple resubmissions of the LSR, and delays the porting process.”³⁸ Charter points out, absent such a requirement, the door is left open for “a virtual ‘round robin’ of communications (i.e., *submit, reject, submit, reject* communications) [that] can go on for days.”³⁹ In addition to frustrating consumer choice, this inefficient process inevitably increases the operational costs for both the porting-out and porting-in providers.⁴⁰

³⁶ Verizon Comments (Redacted Version) at 5-6.

³⁷ Charter Comments at 4-6; Time Warner Cable Comments at 4; Embarq Comments at 6; MetroPCS Comments at 3-4; Sprint Nextel Comments at 12-13.

³⁸ *Notice* ¶ 57.

³⁹ Charter Comments at 5 (italicization in original).

⁴⁰ *Id.*; see also Time Warner Cable Comments at 4.

Moreover, as *Sprint Nextel* explains, the streamlined validation requirements recently established by the FCC should enhance the ability of the porting-out provider to identify any mistakes in the initial LSR: “Now that the Commission has limited the validation fields to four, there is no reason why a porting-out carrier cannot identify in its first port response all errors contained in a port request.”⁴¹ The Commission, therefore, should direct porting-out providers to identify all errors in an LSR when it is initially submitted.

4. The FCC Should Require Providers to Notify Other Carriers Proactively of Changes to Their Porting Requirements and Processes

Comcast agrees with other commenters that all providers should be required to provide affirmative notice of any changes to their LNP requirements or procedures. As MetroPCS explains, requiring carriers to provide advance notice of any changes to their porting procedures will help to ensure that other voice providers have sufficient time to modify their own processes, if required to accommodate the changes, prior to implementation of any such adjustments.⁴² Charter similarly indicates that affirmative notice of carrier changes to porting requirements will “support and promote more efficient, and transparent, transactions between the porting-out and porting-in providers.”⁴³ Requiring advance notification, thus, will enhance voice competition by minimizing unnecessary porting delays, thereby reducing obstacles to switching providers.

⁴¹ Sprint Nextel Comments at 13; *see also* T-Mobile Comments at 6. Of course, this requirement will not require a carrier to identify errors “that cannot be confirmed or rejected because other information is missing or incorrect.” MetroPCS Comments at 3.

⁴² MetroPCS Comments at 7.

⁴³ Charter Comments at 7.

5. The FCC Should Prohibit Porting-Out Providers from Disconnecting Service Until Receipt of the NPAC Activation Notice to Ensure Continuous Service and Access to 911 Emergency Services

In order to ensure proper call routing during the transition period when a number is physically moved from the porting-out provider's switch to the porting-in provider's switch, the unconditional 10-digit trigger should be used.⁴⁴ In addition to this requirement, the FCC should adopt Sprint's proposal to prohibit porting-out providers from disconnecting an existing customer's service prior to receiving the NPAC activation notice.⁴⁵ By specifying that the porting-out provider will not disconnect service, the Commission will ensure that the customer's switch translations remain in the porting-out provider's switch pending execution of the port.⁴⁶ Comcast is already doing this today when it ports out numbers, as are a number of other providers, including AT&T. Adopting Sprint's proposal would provide an additional safeguard against a subscriber's loss of voice service, including vital access to 911 emergency services.

6. The FCC Should Clarify that an Interconnection Agreement Is Not a Precondition to Wireline-to-Wireline Porting

In its *Intermodal Porting Order*, the FCC expressly concluded that interconnection agreements were unnecessary for number ports involving wireline and

⁴⁴ Comcast Comments at 18.

⁴⁵ Sprint Nextel Comments at 14-15.

⁴⁶ Charter argues that some providers refuse to accept cancellation notices after a certain time, which often results in customers being disconnected when porting problems arise after hours. Charter Comments at 6-7 (citing Charter Comments, CC Docket No. 95-116, at 7-8 (Feb. 8, 2007)). Sprint's proposal similarly would remedy this problem.

wireless providers.⁴⁷ Because interconnection agreements similarly are not needed to complete wireline-to-wireline ports, the Commission should reach the same conclusion here.

The commenters claiming that an interconnection agreement should be required do not offer any plausible basis for their position. Embarq, for example, asserts that it should not be required to port numbers to another wireline carrier until the two providers have executed an interconnection agreement. Embarq acknowledges that the FCC expressly rejected this argument when it adopted rules governing ports between wireless and wireline carriers, but contends that requiring an interconnection agreement as a precondition is consistent with the FCC's decision in the *Time Warner Declaratory Ruling*. Embarq further complains that failure to require an interconnection agreement would have adverse consequences with respect to intercarrier compensation arrangements and would allow wireline carriers to port telephone numbers to locations outside of the rate center to which the number is assigned.⁴⁸

As an initial matter, the *Time Warner Declaratory Ruling* is simply inapposite. That decision addressed the issue of whether an incumbent LEC was obligated by section 251(c)(2) to enter into an interconnection agreement with a wholesale provider of telecommunications services that sold service to retail VoIP providers. That issue is completely unrelated to the question of whether an interconnection agreement is

⁴⁷ See *Telephone Number Portability; CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues*, 18 FCC Rcd 23697, ¶ 37 (2003) (“*Intermodal Porting Order*”).

⁴⁸ See Embarq Comments at 11-15 (citing *Time Warner Cable Request for Declaratory Ruling that Competitive Local Exchange Carriers May Obtain Interconnection Under Section 251 of the Communications Act of 1934, as Amended, to Provide Wholesale Telecommunications Services to VoIP Providers*, 22 FCC Rcd 3513, ¶ 17 (2007) (“*Time Warner Declaratory Ruling*”).

necessary for two wireline providers to port numbers. As indicated above, the Commission previously concluded that an interconnection agreement was not necessary in the case of wireline-to-wireless ports and it should reach the same conclusion with respect to wireline-to-wireline ports. To the extent Embarq is concerned about its intercarrier compensation arrangements or the porting of numbers outside the assigned geographic area, these issues clearly are well outside the scope of this rulemaking, and should be presented instead in the appropriate FCC proceeding.

B. There Is No Need to Revisit the Commission's Recent Reforms to the Number Porting Process, Particularly Its Requirement that LNP Validation for Simple Ports May Require No More Than Four Fields

The FCC previously resolved the question of what *customer-specific* information a porting-out provider may require to validate a port request.⁴⁹ There is no need to revisit that issue in this proceeding.

Several commenters, however, contend that the Commission should determine in this proceeding the *carrier-specific* information a porting-out provider may require to process or effectuate a port request from a porting-in provider. According to these commenters, there is an industry consensus that two additional carrier-specific fields are required to process a port request: namely, the Service Provider Identification Number ("SPID"), and customer Desired Due Date ("DDD").⁵⁰

The FCC may wish to ensure industry compliance by expressly specifying that a porting-out provider may require a porting-in provider to submit the following two carrier-specific fields: (1) SPID and (2) DDD. In no event, however, should the FCC

⁴⁹ *Order* ¶ 48. The FCC's new rules establish a minimum standard. If desired, parties may agree to negotiate more favorable terms, *i.e.*, shorter porting intervals or fewer validation fields.

⁵⁰ *See, e.g.*, Sprint Nextel Comments at 11; Embarq Comments at 6.

consider expanding the number of carrier-specific fields required to process a port, nor should it refer the issue to NANC, as suggested by some commenters.⁵¹

III. CONCLUSION

For the foregoing reasons, the Commission should adopt additional reforms to the local number porting process, as described herein.

Respectfully submitted,

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⁵¹ See, e.g., AT&T Comments at 4-5 (suggesting that the FCC should not prescribe specific LNP requirements without adequate prior consultation with NANC).

Certificate of Service

I hereby certify that on this 21st day of April, 2008, true and correct copies of the foregoing Comments of Comcast Corporation were mailed by electronic mail to:

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A handwritten signature in cursive script, appearing to read "Ruth E. Holder", written over a horizontal line.

Ruth E. Holder