

NORTH AMERICAN NUMBERING COUNCIL LOCAL NUMBER PORTABILITY ADMINISTRATION WORKING GROUP

January 15, 2008

To: North American Numbering Council (NANC) Chairman Tom Koutsky

From: Local Number Portability Administration Working Group (LNPA WG)

Re: Completed LNPA WG Work Package to Address FCC Order 07-188

Chairman Koutsky:

Tom,

Attached within this letter please find the NANC Inter-Service Provider LNP Operations Flows and Narratives, and the LNPA WG's Number Portability Best Practices document, that have been revised to address the implementation of FCC Order 07-188, released on November 8, 2007.

During the process of revising the documentation to address FCC Order 07-188, the LNPA WG discussed the continued need for two data fields that are common to both the current Local Service Request (LSR) form and the message that both the Old and New Service Providers send to the Number Portability Administration Center (NPAC) to process a port. These two data fields within the purview of the LNPA WG are the New Service Provider Identification (SPID) and the Desired Due Date. The New Provider SPID is a 4-digit field that identifies the New Service Provider in a port request. All providers with connectivity to the NPAC are required to establish a SPID. The Desired Due Date is the date upon which the New Service Provider wishes the port to take place in order to gain the customer.

The service providers that participated in the revision of these LNPA WG documents unanimously agreed that these two data fields are necessary for established NPAC functionality to be maintained, for the continued efficiency of the porting process, and to ensure the end user's service is not interrupted during the porting process.

Reasons for the continued need for the New Provider SPID and the Desired Due Date on an LSR are as follows:

1. **Retain the ability of the old SP to avoid service outages:** The Old Service Provider "create" message to the NPAC, used by the Old Service Provider (Old SP) in a port to provide confirmation of the pending port to the NPAC, is an optional message if the Old SP agrees with the port request, however, if the Old SP needs to place the pending port into conflict in the NPAC because, for example, the wrong number is about to be inadvertently ported, their only vehicle for doing so is to send the Old SP create message to the NPAC with

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the confirmation “flag” unchecked. The Old SP create message is required in this case in order for the Old SP to retain the ability to maintain customer service. An inadvertent port impacts the terminating service of two customers, the one who wants to port their number and the one who does not. It presents costs for trouble report handling and may involve extended periods of service impairment or outage. The New Provider SPID and the Desired Due Date are necessary NPAC system and local system fields that must be populated on the Old SP create message and must match the same fields in the New SP create message in the NPAC.

2. Additional reasons cited for the need for the Old SP create message, and therefore the New Provider SPID and Desired Due Date, include:
 - **Addressing potential port delay should the Old SP fail to return the Firm Order Confirmation (FOC) in a timely manner:** The Old SP create message enables the Old SP to stop the NPAC timers which were designed to prevent premature activation of the port until they expire. Cancellation of these timers could potentially allow the New SP to still activate the port on the desired due date in this scenario.
 - **Enabling a reduced wireless-to-wireless porting interval:** Although the standard wireless-to-wireless porting interval is currently 2 ½ hours, approximately 80% of these ports take place within 30 minutes. If the Old SP did not send the Old SP create message to the NPAC to cancel the NPAC timers described above, the New SP could not activate the port until 2 hours have elapsed.
3. **Proper identification of New Provider on a port request:** Specific to the New Provider SPID, this LSR field is used by the Old SP to properly identify and verify the submitting provider in order to send the FOC, especially in the case of a faxed LSR.
4. **Accurate scheduling of customer disconnect in Old SP switch to avoid service outages:** Specific to the Desired Due Date, while the Old SP in a port could assume a Desired Due Date based on the current standard porting interval if the New SP does not include the Desired Due Date on an LSR, introducing such an assumption into the porting process has service-affecting consequences should an incorrect assumption be made by the Old SP. The Desired Due Date is used by porting-out providers that schedule the customer disconnect to take place on or after the due date of the port activation. If the New SP failed to provide the Desired Due Date on an LSR, and the Old SP assumed the standard porting interval, however, the New SP had not scheduled the port to take place until some time after that which would be dictated by the standard porting interval, the customer would be taken out of service on the date assumed by the Old SP. A significant percentage of port

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requests currently have Desired Due Dates beyond the standard porting interval.

- 5. Allowing sufficient time to ship necessary Customer Premise Equipment:** Again specific to the Desired Due Date, service providers participating in the discussion whose service offerings include Customer Premise Equipment (CPE) stated that as the New SP in a port, they intend to continue to populate the Desired Due Date on port requests. It is critical that they communicate a Desired Due Date that allows them sufficient time to ship the necessary Customer Premise Equipment (CPE) in order to maintain end user service.

Based on the reasons cited above, all providers participating in the discussion unanimously agreed that the New Provider SPID and Desired Due Date should continue to be necessary data fields on a Local Service Request (LSR). Those providers participating in this discussion at the LNPA WG included:

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|----------------|-----------------------|-----------------------|
| -- Alltel | -- AT&T | -- AT&T Mobility |
| -- Comcast | -- Cox Communications | -- Delta 3 |
| -- Embarq | -- Level 3 | -- One Communications |
| -- Qwest | -- Sprint Nextel | -- T-Mobile |
| -- US Cellular | -- Verizon | -- Verizon Wireless |
| -- Vonage | | |

In a final note, a question was raised at the LNPA WG regarding customers with local service freezes on their accounts and how they should be treated by the Old SP in light of FCC Order 07-188.

We will be presenting this material on behalf of the LNPA WG at the next upcoming NANC meeting. Please do not hesitate to contact us beforehand should you or the NANC members have any questions.

Respectfully submitted on behalf of the LNPA WG,

Gary Sacra
Paula Jordan
LNPA WG Co-Chairs



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