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June 30, 2008

Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: ***Ex Parte Presentation:*** WC Docket No. 07-243: Telephone Number Requirements for IP-Enabled Services Providers; WC Docket No. 07-244: Local Number Portability Porting Interval and Validation Requirements; WC Docket No. 04-36: IP-Enabled Services; WC Docket No. 95-116: Telephone Number Portability; CC Docket No. 99-200: Numbering Resource Optimization

Dear Ms. Dortch:

On June 30, 2008, Bill Solis, Beth Choroser and the undersigned of Comcast Corporation, met with Ann Stevens, Melissa Kirkel, and Randy Clarke of the Wireline Competition Bureau in connection with Comcast's filings in the above-captioned proceeding. The presentation was consistent with Comcast's filings. A copy of Comcast's presentation is attached.

Please do not hesitate to contact me if you have any questions about this matter.

Sincerely,

Mary McManus

Mary McManus

Cc: Ann Stevens
Melissa Kirkel
Randy Clarke

LNP Porting Interval

Federal Communications Commission

June 30, 2008

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A Shorter Interval is Pro-Consumer

- The current standard interval of four days was developed over ten years ago
  - Technological and marketplace changes over the past decade have made faster porting feasible
  - Consumer expectations have been shaped by their experience in porting wireless numbers within a couple of hours
- Consumers must be able to change wireline voice providers while retaining their numbers quickly, easily, and efficiently
- Broad cross-section of industry participants as well as state commissions agree that consumers will benefit if the standard interval for simple ports is shortened from four days

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Comcast Proposal: E-Bonded Providers

- The FCC should adopt a one-day standard interval for electronically bonded ("e-bonded") providers
  - Requests received 7 a.m. - 3 p.m. local time on Day 1 activated on the next day after 12:01 a.m.
  - Requests received after 3 p.m. local time on Day 1 activated after 12:01 a.m. on Day 3
- Today, the vast majority of Comcast's new subscribers who want to port their numbers are ported to Comcast through e-bonding arrangements.
- Since July 2004, Comcast has voluntarily offered next-day porting out to any provider after receipt of a valid porting-out LSR if submitted by 3:00 p.m. Mountain time via Comcast's GUI

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Why E-Bonding Makes a Difference

- E-bonded providers are able to port numbers much faster than providers that are not e-bonded
  - Fields are populated and electronic exchange of order information occurs automatically
  - No need for human intervention as computers perform acknowledgements, validations, and responses
  - Firm Order Confirmation typically issued within several hours of receipt of a valid porting-out LSR
  - Concurrence Subscription automatically sent electronically to NPAC shortly after issuance of Firm Order Confirmation, overriding NPAC timers
  - Currently, the unconditional 10 digit trigger is set near real time or in a nightly batch process
  - One-day porting interval is technically feasible today for carriers with e-bonding, and requires only a single modification to carrier's internal business interval timer

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Comcast Proposal: Non-E-Bonded Providers

- The FCC should establish a standard two-day porting interval for simple ports between non-electronically-bonded wireline providers
  - Requests received 7 a.m. – 3 p.m. local time on Day 1 activated on Day 3 after 12:01 a.m.
  - Requests received after 3 p.m. local time on Day 1 activated on Day 4 after 12:01 a.m.
- Other commenters, including incumbent LECs, support an interval of approximately two days
- Recognizing substantial consumer benefits, California, Ohio, and Nebraska state regulatory commissions also support a shorter porting interval
- The FCC should adopt a reasonable schedule for further reducing the interval for non-ebonded providers to one day within two years

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Calendar versus Business Days

- Calendar-day standard is pro-consumer, pro-competitive
  - Allows porting process to operate continuously (save for recognized holidays)
  - Enables consumers to port numbers more quickly every day of the week
  - Allows for weekend service installations when many consumers have free time from work
  - As self-installation of voice service becomes more common, this standard permits consumers to install service at their convenience

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Other Pending Issues

- FCC should clarify that porting requirements apply without exception to interconnected voice providers, including CLECs
- There is no need for FCC to expand beyond four the number of data fields required for validating a port request.
  - LNP Working Group has adopted Desired Due Date and New Service Provider SPID as a Best Practice for processing ports
- FCC should reject AT&T's proposal to establish additional standard intervals (*e.g.*, "confirmation," "activation") in the porting process

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