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Wireline 4 Business Day Porting Interval vs. Wireless 2.5 Hour Interval

- For 12 years, LECs have been subject to a *4 business day* porting interval.
- The wireless industry, by contrast, has voluntarily instituted a *2.5 hour* porting interval.
- The FCC should shorten the wireline/intermodal porting interval to one business day and investigate feasibility of further reductions in near future.

Lengthy Wireline Porting Interval Limits Consumer Choice and Competition

- Wireline customers regularly have to wait a week or more to port their numbers (including to T-Mobile's @Home service).
- When consumers get frustrated with slow porting, they often abandon efforts to switch carriers.
- Shortening the interval will satisfy FCC objective of allowing consumers to retain their numbers without impairment of quality, reliability, or convenience, when they switch providers.
- Eliminating long porting timeframes will reduce opportunity for anticompetitive mischief.

LNP Delays Harm Consumers

- *CU/PK*: Shortening the interval will allow consumers to "reap the benefits of flexibility in the quality, price, and variety of telecommunications services."
- *CCIA*: "Congress's and the Commission's purpose in mandating number portability was to ensure that consumers could retain their telephone numbers without suffering inconvenience or delay in service when changing from one providers to another."
- *CO PUC*: "A streamlined porting process is important to consumers and will increase competitive choices."
- *NC PUC*: "Delays in porting cost consumers time and money..."

LNP Delays Thwart Competition

- *11 Members of Congress*: "We believe these long delays deter competition that the 1996 Act aimed to promote."
- *TechNet*: "Shortening the porting interval for all wireline and intermodal ports will help stimulate the development of new technologies and the innovation economy."
- *Larry Landis, IN*: "[T]he porting process is a crucial element to the sustainability of a competitive market."
- *Ray Baum, OR*: "Delays in porting...impede carriers who port in numbers from competing effectively."
- *CTIA*: "Such excessive porting intervals now function as a barrier to competition as consumers, frustrated by their attempts to port their phone number to a new carrier, may be inclined to 'give up' their attempts to switch providers."

No Operational or Technical Barriers

- Advances in technology over past dozen years belie ILEC hardship claims.
- If wireless carriers can port in matter of hours, there is no reason wireline carriers should require a week.
- Comcast voluntarily instituted 1 day porting with T-Mobile.
- AT&T, Verizon, and Qwest have not agreed to T-Mobile's request that they meet Comcast terms.
- ILECs have blocked all attempts to resolve issue in industry forums.

The Time for Action Is Now

- ILECs have been on notice since 2003.
  - 3 NPRMs (2003, 2004, 2007) aimed at shortening wireline and intermodal interval.
  - Comment cycle closed April 2008 (except for ILECs, commenters proposed between 2.5 and 48 hours).
- No basis to retain 12-year old interim standard.
- FCC should shorten interval immediately for large ILECs and, if necessary, adopt a phased-in schedule for smaller carriers.

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