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April 29, 2009

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Local Number Portability Porting Interval and Validation Requirements (WC Docket No. 07-244); Implementation of the Cable Television Consumer Protection and Competition Act of 1992 (MB Docket No. 07-29); Review of the Commission's Program Access Rules and Examination of Programming Tying Arrangements (MB Docket No. 07-198) - REDACTED

Dear Ms. Dortch:

We understand the Commission is considering shortening the porting interval for simple ports. As we explain below, if the Commission does so, it should ensure parity among all providers. To ensure parity, the Commission should clarify that the rules apply to all providers, large or small, urban or rural, telephone or cable company (including interconnected VoIP providers and resellers) and that providers must use the same standard forms and the same process within the same timeframes. In addition, we recommend that the Commission engage NANC's Local Number Portability Administration Working Group ("LNPA WG") to provide its expertise on specific issues as outlined below and designate a specific timeframe for doing so. Furthermore, we urge the Commission to continue to measure the interval in business days and provide a sufficient implementation period of nine months following the resolution of the delegated issues. The Commission should also clarify that any new requirements, including the revised definition of simple ports, apply only to wireline-to-wireline and intermodal simple ports as the streamlined wireless-to-wireless porting process currently works well. Finally, as we have explained elsewhere, the Commission should consider the porting interval at the same time as other issues related to customers switching providers, such as parity in the service cancellation process, whether customers can receive marketing during that time, and competing providers' access to regional sports programming controlled by cable incumbents.¹

¹ See Ex Parte Letter from Susanne Guyer, Verizon, to Acting Chairman Michael J. Copps, FCC, WC Docket No. 07-244, MB Docket Nos. 07-29, 07-198 (April 22, 2009).

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First, if the Commission does shorten the interval, doing so could result in problems for customers if not appropriately structured. In particular, the standard interval should be shortened to no less than two business days to allow ports to continue to be completed on-time with no disruption in service.

As an initial matter, our experience shows that there is no need for a porting interval shorter than two business days. The Commission's current required interval is four business days. Verizon, however, already voluntarily offers a shorter standard interval of three business days from receipt of a valid request, and regardless of the interval a carrier selects, completes the port on-time more than 99.5 percent of the time. Only 8 percent of number portability requests select the shorter three day interval. *See* Declaration of Gary Sacra, Louis F. Agro and Ermelinda Tavarez at ¶ 6 ("Sacra/Agro/Tavarez Decl."). The vast majority of number portability requests that Verizon receives – 92 percent – select a longer interval. *Id.* Eighteen percent select due dates four business days after the port request, and 40 percent choose due dates that are seven or more days after the port request. *Id.* Longer due dates allow new providers sufficient time to complete the installation of their own service.

Notably, the carriers that have been the most vocal about the need for a shorter porting interval routinely do not select the first available date from Verizon. For example, even though wireless carriers may not need as much time as cable incumbents to establish new customers' service, Sprint PCS selected a longer interval on ***** percent of the porting requests it submitted to Verizon in 2008, and T-Mobile selected a longer interval on ***** percent of its porting requests. *See* Sacra/Agro/Tavarez Decl. ¶ 7. Similarly, Comcast, another proponent of a shorter standard interval, selected a longer interval on ***** percent of its porting requests. *Id.*

Moreover, establishing too short an interval for simple ports could place more customers at risk of losing some or all of their telephone service during the porting process. Verizon processes about 95 percent of the number portability requests it receives on a flow through basis (without manual handling), and with the necessary system changes, these orders could likely meet a two business day interval. All providers must process some types of requests manually, however, and these manual orders may require some time to process correctly. *See* Sacra/Agro/Tavarez Decl. ¶¶ 11-12. Port requests can fall out in the ordering or provisioning parts of the process for numerous reasons, such as: (1) a pending order in the system that might conflict with the port request; (2) a request to port one line on a multiline account; (3) a request with a due date different from the due date the service provider submitted to the National Portability Administration Center; and (4) a request to cancel a previously submitted port request. *Id.* Because there are a variety of reasons why port requests fall out, numerous employees with different skills are necessary to deal with the substantial number of requests – about 13,000 per month – that fall out. *Id.*

It is these manually-handled porting requests, which all providers have, that would be at risk for service interruption under an unduly shorter standard interval. For example, manual handling may affect setting the 10-digit trigger on the customer's line. The purpose of the 10-digit trigger is to force an LNP database query on every call originating from the donor switch to the ported number before completion of the call to determine the correct routing. If the new

service provider establishes new service for the customer before the 10-digit trigger is set and the disconnection takes place in the donor switch, local calls from the donor switch will not complete to that customer. Because the donor switch still believes it serves the number and the number is still translated, the donor switch will attempt to complete the call intra-switch, but the call will fail to complete. In addition, manually-handled porting requests are more difficult to cancel or reschedule if the new service provider is not ready to port the number on the due date. These customers could lose their service entirely on the due date. At the time Verizon and other providers receive the number portability requests, however, they typically do not know which ones will require manual handling. While it should be possible to complete most of these orders within two business days provided sufficient time is provided to implement and coordinate the necessary systems and process changes with submitting carriers, an interval shorter than this would present substantially greater risks to customers' service. As a result, the standard interval should be shortened to no less than two business days to allow time for manually-handled ports to be completed successfully with no disruption in service.

Second, if the Commission changes the standard interval, all service providers – large or small, urban or rural, telephone or cable – should be subject to the same number portability rules for wireline-to-wireline and intermodal ports. As it did in its LNP Validation Order, the Commission should make clear that its new rules apply to both interconnected VoIP providers and their numbering partners that execute number ports on their behalf.² In particular, customers should be able to port their telephone numbers to Verizon just as quickly as they can port their Verizon telephone numbers to a competitive service provider.

It follows that the same porting interval should apply, regardless of whether a carrier offers electronic bonding. Electronic bonding does not work both ways. Verizon is required to allow numbers to be *ported out* via electronic bonding, but the same requirement is not made of those same providers when they port into Verizon. Comcast, the third largest voice provider, and all other cable companies do not offer electronic bonding for port outs. As these companies are among Verizon's chief wireline competitors, their argument that different intervals should apply to ports completed using electronic bonding is designed to provide them with an artificial competitive advantage.

Importantly, Verizon's role in local number portability is not limited to the porting-out service provider. Last year, Verizon submitted approximately 330,000 number portability requests to competing providers. Because Verizon is both a recipient and an originator of number portability requests, Verizon is well aware of the disparity between its timely performance of its porting obligations – approximately 99.5 percent of port requests to Verizon are completed by the due dates selected, *see* Sacra/Agro/Tavarez Decl. ¶ 8 – and the frequent delays by competing providers when Verizon wins a new customer. Because Verizon is required to report metrics relating to its on-time porting-out performance to certain states while cable

² *See Telephone Number Requirements for IP-Enabled Services Providers; Local Number Portability Porting Interval and Validation Requirements*, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd 19531, ¶ 20 (2007).

providers and other competing providers have no similar requirements, the Commission should require those providers to meet equivalent performance targets as Verizon.

There are a number of different ways that carriers delay ports to Verizon today. By way of background, the end-to-end process to complete a number port includes three separate steps. The first step, for which there is no established Commission interval, is the pre-order process, where it may be necessary to access a customer's service record in order to obtain information that a given provider requires on its order form. The second step is the return of the return of a Firm Order Confirmation ("FOC"), which the Commission requires to be provided within 24 hours. The third step is completing the port itself. Because each of these steps occurs in sequence, a delay at any of these three steps generally will delay the ultimate completion of the port.

In Verizon's experience, about 40 percent of the FOCs Verizon receives from CLECs are late, about 30 percent of the cable companies' FOCs are late, and about 45 percent of the wireless carriers' FOCs are late. *See Sacra/Agro/Tavarez Decl.* ¶ 9. The receipt of late FOCs affects Verizon's ability to complete its required steps to port in the number on the due date it selected and has forced Verizon to select later due dates to account for the delay. Verizon has done this both initially when submitting the port request because a provider's track history indicates that a delayed FOC is likely and during the porting process by submitting a "supp" request to extend the due date after the FOC was in fact delayed. In addition, Verizon selects a later due date when porting customers from competing providers with non-compliant business rules. For instance, Sprint, which processes ports on behalf of Time Warner Cable, has business rules that purportedly allow 48 hours for Sprint to return the FOC. These delays are not new as over a year ago, Verizon described them in its comments.³ To the extent the Commission requires a shorter standard interval, including a shorter FOC return interval, Verizon expects the frequency of such delays to only increase from providers that struggle to meet today's interval.

In addition, some providers engage in practices during the pre-order process that extend the time it takes for the porting interval to even begin. For example, Cavalier requires the new provider to include the customer's account number for verification on its order form for number portability requests. *See Sacra/Agro/Tavarez Decl.* ¶ 10. To obtain the account number, Verizon usually must request a Customer Service Record ("CSR") from Cavalier, and in certain states, Cavalier's business rules allow up to five business days for Cavalier to return the CSR. *Id.* Thus, Cavalier's account number requirement effectively adds five business days to Cavalier's four business day porting interval in these states. Some states, including New York and Pennsylvania, require CSRs to be returned within 24 hours in their CLEC to CLEC/ILEC migration guidelines, and providers generally comply with those requirements. Yet in states with no such requirements, certain providers allow themselves up to five times as long to return the CSR. By contrast, Verizon provides porting-out carriers with the ability to obtain the CSR information instantaneously in most instances and within 24 hours the rest of the time. Therefore, a single 24-hour standard to return CSRs should apply to all providers nationwide.

³ *See generally* Comments of Verizon, *Local Number Portability Porting Interval and Validation Requirements*, WC Docket No. 07-244 (Mar. 24, 2008).

The use of non-standard Local Service Requests (“LSRs”) throughout the industry also delays the start of the porting interval. Verizon uses an industry standard LSR for other carriers to submit port requests to Verizon. Other carriers, however, require the use of a non-standard LSR to submit port requests to those carriers. In these cases, the new provider must spend a significant amount of time to fill out the LSR, and if the new provider does not use the non-standard LSR required by the old provider, the LSR will be rejected. Verizon, for example, must complete over 20 different LSR forms to submit port requests to other carriers on a regular basis. An industry group, ATIS’s Ordering & Billing Forum (“OBF”), is in the process of developing a standardized LNP ordering process and form to encompass simple and complex ports. While many providers would likely adopt the standard form, the use of the form would be voluntary because ATIS OBF lacks the authority to require all providers to use the form. A standardized form developed by the industry would simplify the porting process and should be required. The Commission could direct the industry to develop a standardized form via the OBF and to do so within a designated timeframe.

Finally, ensuring that providers do not delay the number port is not enough. The Commission should also make clear that all porting-out providers must complete the steps set forth in the NANC LNP Provisioning flows to prevent a disruption in the customers’ service. The flows state that a 10-digit trigger should be set by the old provider in its donor switch (or the porting-out provider should disconnect service as soon as possible upon activation of the port). Even though a customer’s number can be ported to the new provider without the trigger being set, as described above, the newly ported customer would not be able to receive local calls from the porting-out provider’s switch that previously served the customer until the old provider disconnects service. Cavalier, for example, declines to set the 10-digit trigger even though it waits until the day after the port to disconnect the customer. Other competitors, including Comcast and Cablevision, fail to set the trigger in time for certain ports. As a result, new Verizon customers may not be able to receive calls for a period of time, at times until the old service is disconnected the next day, and may complain to Verizon that their service is substandard to the service they switched from. Thus, to avoid a disruption of service to consumers, not only should all providers be held to the same standard interval, but also the same porting-out steps.

Third, if the Commission decides to shorten the standard interval, it should utilize the expertise of industry groups to work through specific issues. Apart from ATIS OBF’s work on a standard form discussed above, the LNPA WG is uniquely situated for this role as it is currently considering important porting issues, such as the timeliness of returning the FOC, possible revisions to the NANC LNP Provisioning Flows, and software and architectural changes to the Number Portability Administration Centers (“NPACs”). The Commission should designate the LNPA WG as the group responsible for determining how soon the FOC must be returned so that the new provider has sufficient time to complete all the necessary steps to establish the customer’s service two business days after the submission of the port request, when the standard interval begins, revisions to the NANC LNP Provisioning Flows, and software changes to the NPAC. It is important that the Commission allow the LNPA WG a reasonable amount of time to resolve these issues.

Fourth, the Commission should continue to measure the standard interval in business days. While there may be little consumer demand for a port request submitted at 11:59 Friday night to be completed by 11:59 Sunday night, measuring the standard interval in hours would require *all* carriers to have the employees necessary to handle manual fall out of any volume on site around-the-clock, including on weekends and holidays. These costs would be substantial for all carriers, including Verizon.

Fifth, to benefit customers of resellers who are porting wireline-to-wireline or intermodally, the Commission should broaden its current definition of simple ports to which any reduced standard interval would apply. The Commission's current definition of simple ports is single line ports that do not involve unbundled network elements, resellers or complex switch translations.⁴ The Commission should amend its definition of a simple port to include single line ports from resellers in the context of wireline-to-wireline or intermodal ports. A reseller should be defined as a non-facilities-based service provider that has a wholesale arrangement with a facilities-based network service provider to utilize the network provider's facilities (e.g., switch) in order to provide retail service to its end users. Because wireline-to-wireline and intermodal ports from resellers follow the same NANC LNP Provisioning flows as single line ports from interconnected VoIP providers, which are considered simple ports, there is no reason why single line customers of resellers should not be able to switch voice providers as quickly.

The revised definition of a simple port, however, should not apply to wireless-to-wireless ports. There, the porting-out carrier is required to take the additional steps of notifying the reseller of the port and receiving confirmation from the reseller before returning the FOC to the new provider. The completion of these steps is not always possible in the two-and-a-half hour wireless-to-wireless standard interval.

Sixth, the Commission should allow enough time for all service providers to implement such changes. It will take Verizon and other providers a number of months to plan for and perform the essential IT systems modifications, software development and programming, and field testing, based on our current general understanding about the interval the Commission may impose. However, much of that work cannot be started until the LNPA WG and OBF conclude their deliberations, and additional IT systems work may then be required. As a result, the implementation period should include two components – an interval for the LNPA WG and OBF to deliberate and complete their recommendations, and a separate implementation period that starts *after* the LNPA WG and OBF makes their recommendations. Otherwise, if the periods run concurrently, the implementation period for service providers that may appear sufficient on its face may in reality, be too short.

While changing the porting interval from four business days to two (or, in our case from three days to two) may seem like a simple change, it actually is fairly complicated to design, implement, coordinate and test the various system and process changes that are needed to successfully implement a shorter interval. Once the Commission's new regulations are finalized

⁴ *Telephone Number Requirements for IP-Enabled Services Providers*, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd 19,531, ¶ 46 n.153 (2007).

and the results of the LNPA WG and OBF are released, Verizon must develop compliant business requirements for use by its IT group. In order to change the porting interval, IT changes are needed for at least three separate systems that are involved in the porting process, including one that is administered by a third party vendor and that must interact with the NPACs. After IT receives these requirements, the necessary IT work typically requires around five months to design and implement a solution. Once the IT work at Verizon is completed and thoroughly tested, additional time is necessary for implementation because by its very nature, the local number porting process requires coordination and communication between the porting out and porting in service provider. For example, under a shorter porting interval, there may not be sufficient time to accept “supp” requests to change the due date or cancellations of porting requests and all these various scenarios would have to be tested. Any resulting changes in when and how service providers may supplement or cancel their porting requests then would have to be coordinated with and communicated to service providers that submit porting requests to Verizon.

The Commission has in the context of numerous Section 271 Orders repeatedly recognized the importance of appropriate “change management processes” for effectuating changes to ordering and provisioning systems. Indeed, the Commission mandated adherence to such processes as part of the BOCs’ section 271 check-list obligations.⁵ These plans were typically negotiated between carriers operating in various regions, and so the precise details differ. But the approved timelines typically require *detailed* notification of changes to other carriers two to three months prior to a change being implemented. Specifically, Verizon must provide the following to CLECs prior to the IT release: (i) draft business rules 73 days prior; (ii) draft technical specifications 66 days prior; and (iii) final business rules and technical specifications 45 days prior. While these particular requirements may not apply in this instance, they are indicative of the time that is typically required to coordinate systems changes, and to provide time for all affected carriers to complete their systems work and to perform tests so that any errors can be corrected before the change occurs. Moreover, in order to ensure reasonable stability in ordering processes, there are limited number of change releases in a given year that are scheduled well in advance – typically a year ahead of time. Verizon’s CLEC-affecting changes occur in February, June, and October.

Outside of services providers, system changes will also be required in the NPAC system to implement a shorter interval. As a result, the IT timeline for the NPAC administrator, Neustar, to set the applicable timers and complete other necessary systems tasks must also be considered when determining a reasonable implementation period.

⁵ See, e.g., *Joint Application by BellSouth Corp., BellSouth Telecomms., Inc., And BellSouth Long Distance, Inc for Provision of In-Region, Inter-LATA Services in Georgia and Louisiana*, Memorandum Opinion and Order, 70 FCC Rcd 9018, ¶ 179 (2002).

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April 29, 2009

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Therefore, in order to permit all these steps to occur smoothly and to minimize that potential for disruption for customers, Verizon recommends an implementation period of approximately nine months that begins after the LNPA WG and OBF completely resolve their issues. This would allow all the steps described above to occur so that the transition is seamless to customers.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne D. Burton". The signature is written in a cursive style with a large, stylized initial "A".

Attachment

cc: Nick Alexander
Jennifer Schneider
Mark Stone
Julie Veach
Randy Clarke
Bill Dever
Al Lewis
Marv Sacks
Deena Shetler
Ann Stevens

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

In the Matter of

Local Number Portability Porting Interval
and Validation Requirements

WC Docket No. 07-244

**DECLARATION OF GARY SACRA,
LOUIS AGRO AND ERMELINDA TAVAREZ**

1. My name is Gary Sacra. My business address is 99 Shawan Road, Cockeysville, Maryland. I am a Distinguished Member of the Technical Staff in Verizon's Technology Organization. In my 30 years with Verizon or its predecessor companies (collectively, "Verizon"), I have held various positions in Engineering, Planning, and Industry Standards. I graduated with Honors from Towson University with a Bachelor of Science degree in Mathematics. In addition, I graduated from the Advanced Technology Institute at Carnegie Mellon University in Pittsburgh, Pennsylvania.

2. Since 1994, I have worked on the implementation of Local Number Portability ("LNP") for Verizon. I also currently represent Verizon on a number of industry fora charged with addressing LNP issues and developing LNP standards. I currently serve as a Co-Chair of the Local Number Portability Administration Working Group ("LNPA WG"), which reports to the North American Numbering Council ("NANC"). I also represent the LNPA WG at each of the NANC meetings. In addition, I am an industry LNP Project Executive, serving as a technical advisor to the North

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American Portability Management LLC on matters involving the NeuStar Number Portability Administration Centers (“NPACs”).

3. My name is Louis Agro. My business address is One Verizon Way, Basking Ridge, New Jersey 07920. I have been employed by the Verizon companies and their predecessor companies since 1995. I am Director – Product Management/Product Development with primary responsibility for developing and implementing Verizon’s performance measurements and remedy plans for wholesale products and services, including number portability. I am responsible for regulatory support relating to the performance standards and the service levels provided to competing local exchange carriers (“CLECs”), cable companies and wireless carriers.

4. My name is Ermelinda Tavarez. My business address is One Verizon Way, Basking Ridge, New Jersey 07920. I have been employed by the Verizon companies and their predecessor companies since 1999. I am a Director. I am responsible for developing and implementing Verizon’s processes for submitting number portability requests to CLECs, cable companies and other service providers.

5. The purpose of our Declaration is to address the due dates that CLECs, cable companies and other service providers select when submitting Local Service Requests (“LSRs”) for simple ports. In particular, we show that 92 percent of the LSRs received by Verizon for simple ports request a longer interval than the 3 business day interval offered by Verizon. We also show that many CLECs and cable companies are not complying with the current standard intervals for returning Firm Order Confirmations (“FOCs”), which delays Verizon’s ability to receive a port from these companies. In addition, some of these companies are imposing artificial restrictions on their LNP

processes that increase the amount of time it takes Verizon to receive a port from these companies. Finally, we show that some porting requests require manual handling and that there would be an increased risk of service interruption for these orders under a shorter porting interval.

6. Even though Verizon’s incumbent local exchange carriers offer a standard interval of 3 business days for simple number portability requests, carriers usually request a longer interval. During 2008, 92 percent of all number portability requests submitted to Verizon had a due date longer than the 3 business day interval offered by Verizon. Only 8 percent of number portability requests select Verizon’s standard interval of 3 business days. The following chart shows the requested due date interval and the percentage of requests for that interval:

Service Provider Type	Three Business Days or less	Four Business Days	Five Business Days	Six Business Days	Seven or more Business Days
Cable	6%	18%	18%	21%	37%
CLEC	11%	16%	12%	14%	47%
ILEC	28%	10%	10%	10%	42%
Wireless	18%	50%	21%	10%	1%
Total	8%	18%	16%	18%	40%

7. Several of the carriers that have supported a shorter porting interval in this docket routinely do not select the first available date from Verizon. For example, Sprint selected a longer interval on ***** percent of the porting requests it submitted to Verizon in 2008. Likewise, T-Mobile selected a longer interval on ***** percent of its porting requests and Comcast selected a longer interval on ***** percent of its porting requests.

8. Verizon's on time performance for completing number portability requests is nearly perfect. In 2008, Verizon (former Bell Atlantic and GTE entities) completed nearly 1.4 million intramodal and intermodal porting requests. Over 99.5 percent of these porting requests were completed on time.

9. The Commission's current number portability interval includes a 24-hour interval for returning a Firm Order Confirmation ("FOC"). In Verizon's experience, many service providers frequently do not return the FOC within that prescribed interval. In 2008, approximately 40 percent of the FOCs Verizon received from CLECs were late. During this same period, about 30 percent of the FOCs Verizon received from cable companies were late and about 45 percent of the FOCs Verizon received from wireless companies were late.

Jan-Dec 2008 FOC Performance for Port-ins to Verizon by Provider Type			
Service Provider Type	FOC Data	Total	% FOCs Late
CABLE	Sum of FOCS REC ON TIME	91,781	29%
	Sum of TOTAL FOCS REC	129,398	
CLEC	Sum of FOCS REC ON TIME	64,276	39%
	Sum of TOTAL FOCS REC	104,881	
ILEC	Sum of FOCS REC ON TIME	46,611	49%
	Sum of TOTAL FOCS REC	91,057	
WIRELESS	Sum of FOCS REC ON TIME	980	45%
	Sum of TOTAL FOCS REC	1,790	
Total Sum of FOCS REC ON TIME		204,782	38%
Total Sum of TOTAL FOCS REC		329,272	

10. Some carriers are circumventing the Commission's prescribed number portability interval by interposing artificial requirements. For example, Cavalier requires the customer's account number for verification on all number portability requests. *See* Cavalier Business Rules (copy attached). If the Cavalier customer does not know his or

her account number, Verizon must request a Customer Service Record (“CSR”) from Cavalier and, in certain states, wait up to five business days for Cavalier to return the CSR. *Id.* Cavalier’s account number requirement effectively adds five business days to Cavalier’s four business day porting interval.

11. Although Verizon processes about 95 percent of the number portability requests it receives on a flow through basis (without manual handling), the remaining number portability requests fall out of flow through and require manual handling. On a monthly basis, Verizon receives about 13,000 port requests that fall out and require manual handling. Such manual handling almost always increases the amount of time it takes to complete the porting process.

12. Port requests can fall out at different times in the process – *i.e.*, in ordering or in provisioning. There are many reasons why a request would require manual handling, such as: (1) a pending order in the system that might conflict with the port request; (2) a request to port one line on a multiline account; (3) a porting request with a due date different from the due date the service provider submitted to the National Portability Administration Center (“NPAC”); (4) a request to cancel a previously submitted porting request. Because there are numerous reasons for fall out, many Verizon employees with different expertise and skill sets are required to manually process the 13,000 porting requests that fall out each month.

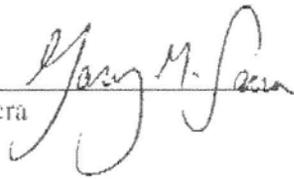
13. Because manual handling increases the time it takes to complete a porting request, the requests that fall out would be at risk for service interruption under a shorter standard interval. For example, manual handling may delay setting the 10-Digit trigger on the customer’s line. The 10-Digit trigger forces an LNP database query on every call

originating from the donor switch to the ported number before completion of the call to determine the correct routing. If the new service provider establishes service for the customer and activates the port via the NPAC before the 10-Digit trigger is set, local calls from that Verizon switch will not complete to that customer.

14. Manually-handled porting requests are also more difficult to cancel or reschedule if the new service provider isn't ready to accept the port on the due date. These customers could lose their service entirely on the due date. At the time Verizon receives the number portability request, it does not know which ones will require manual handling and cannot be completed within a shorter interval.

15. This concludes our declaration.

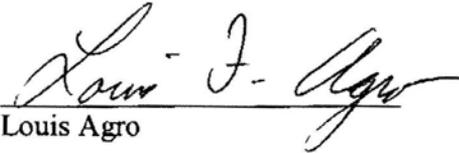
I, Gary Sacra, declare under penalty of perjury that, to the best of my knowledge,
the foregoing is true and correct.



Gary Sacra

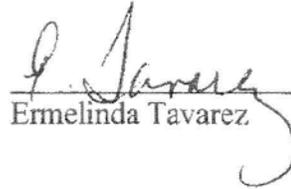
Date: April 21, 2009

I, Louis Agro, declare under penalty of perjury that, to the best of my knowledge,
the foregoing is true and correct.


Louis Agro

Date: April 23, 2009

I, Ermelinda Tavaréz, declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.


Ermelinda Tavaréz

Date: April 21, 2009