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May 5, 2009

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

Samuel L. Feder
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Re: *Ex Parte Notice: Telephone Number Requirements for IP-Enabled Services Providers*,
WC Docket Nos. 07-243, 07-244 & 04-36, CC Docket Nos. 95-116 & 99-200

Dear Ms. Dortch:

On May 4, 2009, Megan Delany, Vice President and Senior Counsel for Charter Communications, Inc. (“Charter”) and I, representing Charter, met separately with Mark Stone and staff from the Wireline Competition Bureau (“WCB”) about the above-referenced proceedings. Attending the WCB meeting were Julie Veach, Randy Clarke, Al Lewis, Deena Shetler, Ann Stevens, Marv Sacks, and Melissa Kirkel. In both meetings, Charter reiterated the points made in its comments and reply comments – that the porting interval should be reduced to two days or less, that porting-out providers should be required to identify all known errors in an LSR at the same time, that the Commission should reaffirm that only four fields may be unilaterally required for porting, and that the Commission should adopt the other clarifications Charter has previously advocated.

Charter also expressed concern with any delay in implementation of a shortened porting interval. Charter currently completes approximately 13,000 ports per week. Charter uses only manual processes and completes ports within one business day for all residential ports and all business ports of 20 lines or less. Charter is able to do this today, even though its systems span the country and overlap with more than 430 different telephone providers. Most of the providers that compete with Charter for telephone service are responsible for substantially smaller footprints, usually within a specific state or region. Given that Charter is currently able to complete ports in a day, on a national scale without automation, there is no reason why any other company, large or small, should not be able to complete ports within two days almost immediately. Accordingly, Charter opposes any lengthy delay in implementation of a shortened porting interval.

Additionally, Charter objects to proposals from AT&T and Verizon that the Commission delay implementation of a shortened porting interval until the North American Numbering Council (NANC) has completed “reengineering” the process for handling number ports. While Charter has no objection to the NANC improving the process for porting numbers, a shorter porting interval should be put in place as soon as possible, and should not be postponed for the NANC process to be completed. The Commission issued its NPRM on shortening the porting

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interval in November 2007 – a year and a half ago. At that time, delays in number porting had already proven to be a substantial impediment to the ability of new entrants like Charter to win customers away from incumbents. The problem has only gotten worse, as incumbents continue to use number porting delays to thwart competition. Moreover, incentives for incumbent carriers to cooperate in a NANC process to streamline porting will only be increased if they are already required to meet a shortened porting deadline, and know the NANC process cannot be used as a delay tactic.

In accordance with §1.1206 of the Commission rules, one copy of this letter is being filed electronically via ECFS, and one delivered via email to the FCC participants.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Feder', with a long horizontal flourish extending to the right.

Samuel L. Feder