

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Local Number Portability Porting Interval and Validation Requirements)	WC Docket No. 07-244
)	
Telephone Number Portability)	CC Docket No. 95-116
)	

**COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY
SOLUTIONS' ORDERING AND BILLING FORUM**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of the ATIS Ordering and Billing Forum (OBF), hereby submits these comments in response to the Federal Communications Commission's (Commission) *Further Notice of Proposed Rulemaking (FNPRM)* released May 13, 2009, in the above referenced dockets¹. Given ATIS OBF's longstanding history in leading efforts to resolve national issues affecting the ordering, billing and provisioning of telecommunications services, OBF is pleased that the Commission in the *FNPRM* seeks stakeholder input on further steps that could be taken to improve the porting process in light of the new one day porting interval for simple wireline and simple intermodal port requests established in the *Report and Order (R&O)*².

I. Background

ATIS is a global standards development and technical planning organization that is committed to providing leadership for, and the rapid development and promotion of, worldwide

¹ In the Matter of Local Number Portability Porting Interval and Validation Requirements, WC Docket No.07-244, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 09-41 (rel. May 13, 2009).

² *Id.*

technical and operations standards for information, entertainment and communications technologies using a pragmatic, flexible and open approach. As an American National Standards Institute (ANSI) accredited standards development organization, ATIS has been serving the evolving needs of the telecommunications industry for over 25 years by prioritizing the industry's most pressing, technical and operational issues, and creating interoperable, implementable end-to-end solutions and standards.

The ATIS membership spans all segments of the industry, including local exchange carriers, interexchange carriers, wireless equipment manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, providers of commercial mobile radio services, broadband providers, software developers, consumer electronics vendors, digital rights management companies, central authentication service companies and internet service providers. Industry professionals from more than 250 communications companies actively participate in ATIS' open industry committees and other forums.

The ATIS Ordering and Billing Forum (OBF) is an open telecommunications industry forum that identifies and resolves national issues affecting the ordering, billing, provisioning and exchange of information about access services, connectivity and related matters. The ATIS OBF has several committees that work on and resolve, among other things, issues related to number porting. The Local Service Ordering and Provisioning (LSOP) Committee of the OBF examines the business processes and documentation management issues associated with local service ordering and provisioning as well as the migration of local service between wireless, wireline and broadband carriers. Another ATIS OBF standing committee, the Wireless Committee, identifies and resolves technical and operational issues related to wireless communication interfaces and associated processes. The Wireless and LSOP Committees also work together (under the auspices

of the OBF Intermodal Subcommittee) to address issues that impact both segments of the industry as they relate to intermodal local number portability.

The industry participants working within the ATIS OBF are the key subject matter experts working on number portability issues. Their hard work has allowed the OBF to promulgate effective voluntary industry guidelines for use by the telecommunications industry, and to evolve these guidelines as necessary to meeting evolving industry needs. The industry guidelines are developed using ATIS' open, equitable and consensus-based processes and are constantly updated to address new issues and to reflect the changing nature of the communications industry:

- ATIS Local Service Ordering Guidelines (LSOG). These guidelines (LSOG) contain ordering forms and descriptions of valid data entries that are required for the ordering and provisioning of local telecommunications service. Included within the LSOG are the forms used to port a telecommunications subscriber from one service provider to another.
- ATIS Wireless Inter-carrier Communications Interface Specification (WICIS). This specification provides guidelines for wireless-to-wireless migrations.

The ATIS OBF works proactively for the benefit of the industry. For instance, even prior to the release of the *FNPRM* and the related ruling in the above-referenced proceedings, the ATIS OBF began addressing the industry's need for a streamlined process for intermodal number portability and has since accelerated its efforts with the purpose of providing constructive input and feedback to the Commission and the North American Numbering Council (NANC), which has been directed in the *R&O* to develop updated local number portability provisioning process flows that reflect the shortened porting interval.³

On May 21, 2009, the NANC Local Number Portability Administrator Working Group (LNPA WG) contacted ATIS OBF to request input on a standard list of data fields to be used for

³ *Id at ¶ 10.*

simple and non-simple ports. On July 16, the ATIS OBF provided a report to the NANC to update it on ATIS OBF's progress toward defining a standard list of data fields. The ATIS OBF presentation to the NANC is publicly available at [http://www.atis.org/obf/Docs/Final%20OBF%20Local%20Number%20Portability%20NANC%20Presentation%20\(July%2016%202009\)%20v4.ppt](http://www.atis.org/obf/Docs/Final%20OBF%20Local%20Number%20Portability%20NANC%20Presentation%20(July%2016%202009)%20v4.ppt).

II. Discussion

A. Additional Information Fields Needed for Porting Process

In the *FNPRM*, the Commission seeks comment on whether there are different or additional information fields necessary for completing simple ports.⁴ Due to the intricacies of the systems involved with porting numbers from one provider to another, ATIS OBF believes there are additional information fields that are necessary to complete a successful number port request. While its recommendation has not yet been finalized, ATIS OBF expects to complete its work identifying a standard set of data fields needed to accomplish a simple port request in the near future. ATIS OBF plans to submit its final recommendation and findings to the LNPA WG for inclusion in the NANC's report to the FCC pursuant to the *R&O*. The ATIS OBF recommendation will cover wireline-to-wireline and intermodal porting and will not address any changes to the wireless-to-wireless porting process.

⁴ *Id* at ¶ 19.

B. Standardization of the Local Service Requests Forms

The *FNPRM* also seeks comment on whether the LSR forms should be standardized and how that might be accomplished.⁵ ATIS OBF believes that standardization of the LSR is necessary and that this standardization can be accomplished by designating a specific date for compliance with the new LSR forms. To that end, ATIS OBF has been working to address standardization of the LSR even prior to the release of *FNPRM*.

III. Conclusion

ATIS is pleased to have the opportunity to provide feedback to the Commission on further steps that can be taken to make the number porting process as seamless and efficient as possible. ATIS recommends that any further changes to the porting rules be drafted with careful consideration of the potential impact that new changes may have on the industry and on end users.

⁵ *Id at ¶ 19.*

Respectfully submitted,

ATIS on behalf of OBF

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