

GVNW Consulting, Inc.  
WC Docket No. 07-244, CC Docket No. 95-116  
August 26, 2009

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

In the matter of	)	
	)	
Local Number Portability Porting Interval and	)	WC Docket No. 07-244
Validation Requirements	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116
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REPLY COMMENTS OF GVNW CONSULTING, INC.

GVNW Consulting, Inc.  
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## **INTRODUCTION AND BACKGROUND**

GVNW Consulting, Inc. (GVNW) is a management consulting firm that provides a wide variety of consulting services including Local Number Portability (LNP) Service Order Administrator (SOA) services on behalf of many rural telecommunication carriers nationwide. As an active member of the Local Number Portability Administration Working Group (LNPA) and the associated sub committees, GVNW provides the following reply comments in regards to the Local Number Portability Porting Interval and Validation Requirements released May 13, 2009.

GVNW requests that the FCC be mindful of the burden additional LNP requirements will impose on rural LECs and to weigh that burden against the possible benefits of the additional requirements.

### **Simple Port Form**

GVNW urges the Federal Communications Commission (FCC) to require all providers to use the same form when requesting a simple port. GVNW believes that if a "Simple Port" standardized form is adopted, it will allow the Old Service Provider (OSP) to easily identify the request as a simple port and respond promptly according to the recent FCC one business day mandate. This will be especially helpful for the rural LECs who typically receive port requests via email or fax and have limited staff to easily identify the requests which require prompt attention.

### **Disconnection of Service**

GVNW also encourages the FCC to require that the OSP wait at least forty-eight (48) hours from the port date before disconnecting services. GVNW disagrees with Sprint Nextel Corp's comments in asking the FCC to require the OSP to confirm that the port actually occurred before disconnecting service. GVNW believes that it is the New Service Provider's (NSP) responsibility to ensure the port took place however; GVNW does agree that the FCC should require the OSP to wait at least forty-eight (48) hours from the port date before disconnecting service. This will allow ample time in the event that the

telephone number needs to be “snapped back” to the OSP. It will also reduce the number of times that end users are without dial tone due to processing errors either by the OSP or NSP.

### **Simple Port Definition**

GVNW requests that the FCC reiterate and expand the definition of a “simple port” to clarify that it is a single telephone line that does not involve an unbundled network element (UNE), does not involve resellers or interconnected VoIP providers or does not include voice lines that are bundled with Digital Subscriber Line (DSL) service.

Further, GVNW supports Cbeyond, Inc., Integra Telecom, Inc., and One Communications Corp.’s position on the simple port definition and agrees that if the meaning of a simple port is changed from its original intent, it will place additional administrative and technical burdens on the rural incumbent LECs and hinder the LNPA WG efforts.

Because resellers and interconnected VoIP providers do not have their own switch, this places another carrier in the porting process therefore causing further additional delay.

GVNW disagrees with T-Mobile USA, Inc. regarding the expansion of the simple port definition to include telephone numbers bundled with DSL service. A telephone number representing a line with local service bundled with DSL functionality absolutely cannot be included within the simple port definition due to the associated billing issues and possible lack of customer knowledge. Moreover, it is likely that the end user pricing will be substantially different between DSL provided with a telephone number and DSL provided without a telephone number. Many rural LECs opt to contact the customer to notify them of the price difference and to actually confirm whether or not the customer desires to maintain the broadband service. In some cases, rural LEC’s do not provide DSL service without an associated telephone number which could cause customer confusion, inconvenience and aggravation. The coordination required for port requests involving associated DSL service especially for rural LECs who

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have limited staff and resources will certainly require more time than what is currently allowed for a simple port.

**Conclusion**

It is imperative that rural LECs be taken into account when imposing faster, more complicated and more burdensome LNP rules. GVNW urges the Commission to recognize the significant difference in the available staff and resources for rural LECs and to incorporate those differences into the new LNP rules and procedures.

Respectfully Submitted,

Via ECFS at 8/26/09

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