Attachment #5

October 28, 2009

The Honorable Betty Anne Kane
Chair, North American Numbering Council
Public Service Commission of the District of Columbia
1333 H Street, N.W., West Tower 7th Floor
Washington, DC 20005

RE: Cox Communications, Inc. and Comcast Corporation's Minority Report to the Local Number Portability Administration-Working Group's (LNPA-WG) Report to the North American Numbering Council - **Revised "Required" LSR Fields**

Dear Chairperson Kane,

Comcast and Cox commend the NANC for directing the LNPA WG to further review its recommendation on standardizing the LSR fields necessary for completing simple ports. We also applaud the effort by the OBF to reduce the number of fields deemed mandatory. In less than a week, the OBF was able to eliminate seven fields, leaving 14 labeled "required."

That said, Comcast and Cox believe that, if NANC is to present to the FCC any recommendation on which LSR fields are required, the LNPA WG itself should fully evaluate the OBF's submission. Comcast and Cox continue to believe that additional reductions can be made, but in any case, the open participation and discussion available via the LNPA WG's processes could result in a plan the FCC is more likely to find acceptable. We reiterate our concern, expressed in our Minority Report of October 13, 2009, that extraneous fields create additional opportunities for delay or denial of customer port requests. This stands in stark contrast with the goals of the FCC's Order prohibiting the use of more than four fields (FCC 07-188) to validate an LSR.

Many parties have submitted filings on whether and how to standardize required LSR information in the Commission's open proceeding (FCC 09-41, FNPRM). Comcast and Cox agree in principle with the need for such standardization. However, Comcast and Cox request that the LSR fields standardization proposal as presented to NANC not be included in the NANC recommendation to the FCC on implementing the one business day interval for

simple ports. We will note that the FCC did not direct NANC to comment on the issue of standardization. Consequently, the absence of any suggestions on LSR fields in the NANC report is appropriate. NANC fulfilled its duties completely. Should the FCC decide that further work on standardizing LSR fields can and should be done by the industry, the standardization proposal would remain with LNPA-WG where all industry participants will benefit from additional comprehensive evaluation of the ATIS's OBF proposal, and not just paying members of the OBF.

Sincerely,

/s/ Cindy Sheehan

Cindy Sheehan
Senior Director
National Customer Activation & Repair
Comcast Corporation

/s/ Jose Jimenez

Jose M. Jimenez
Executive Director
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