

November 19, 2009

Sharon E. Gillett
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Recommendation of the North American Numbering Council/Non-Consensus
Recommendation on Standard Local Service Request (LSR) Data Fields
WC Docket No. 07-244, CC Docket No. 95-116

Dear Ms. Gillett,

The undersigned members of the North American Numbering Council (NANC) submit for your consideration an alternative proposal to the Non-Consensus Recommendation on Standard Local Service Request (LSR) Data Fields submitted on November 2, 2009 by NANC Chairman Kane.

As noted in the October 28, 2009 Minority Report of Cox Communications, Inc. and Comcast Corporation to Chairman Kane, we commend the Local Number Portability Administration Working Group (LNPA WG) for its efforts to develop a standardized list of LSR fields. However, we continue to maintain that additional reductions can and should be made to the list of required fields. We believe that extraneous fields create unnecessary opportunities for errors that will likely result in delay or denial of port requests that harm consumers.

After carefully examining the list of fields put forward in the Non-Consensus NANC Recommendation, we propose that the following fields will provide sufficient information to validate and effectuate a simple port within the Commission's mandated one business day interval:

1. CC (Company Code)
2. PON (Purchase Order Number)
3. AN (Account Number)
4. DDD (Desired Due Date)
5. NNSP (New Network Service Provider Identifier)
6. ZIP (5 digit zip code)
7. PORTED NBR (ported Telephone Number)
8. VER (Version number)

The above list *excludes* six fields from the list proposed in the Non-Consensus NANC Recommendation. Below is the list of fields excluded and the reason for their exclusion:

- 1. CCNA – (Customer Carrier Name Abbreviation):** The information in this field is not needed to validate or complete a port. Carrier identification is provided in at least two other fields on the LSR -- CC and NNSP.

- 2. REQ TYP – (Requisition Type and Status):** This field would be employed “...to determine the type of order to be processed”. The ATIS/OBF states in its Assumptions for LSR-required fields that “A decision was made to consolidate all number portability only ordering under REQ TYP=C.” Consistent with ACT (below), there is only one possible activity for a Simple Port LSR, i.e., to port the TN. This field is redundant and unnecessary.

- 3. ACT – (Activity):** Information in this field would identify “the activity involved in this service request”. As with REQ TYP, there is only one possible activity for a Simple Port LSR, i.e., to port the TN. This field is redundant and unnecessary.

- 4. AGAUTH – (Agency Authorization Status):** This field would indicate “that the [New Provider] is acting as the end user’s agent and has authorization on file”. It is not the duty or privilege of the Old Service Provider to enforce whether the New Service Provider is the authorized agent for a port request. This field, as such, is unnecessary.

- 5. NPDI - (Number Portability Direction Indicator):** Data in this field would identify “the direction of LNP conversion activity and the Enhanced (E) 9-1-1 database record.” This field is not required for an LSR to port a customer’s TN or to provide an end user’s address for E911 services. It is industry standard to unlock and migrate the 911 record at the time of disconnection. Cox and Comcast have confirmed with Automatic Location Identifier (ALI) Host and Public Service Answering Point Providers (PSAPs) that other providers in the industry are not using this field.

- 6. TEL NO (INIT):** This field would contain the telephone number of the New Provider that initiated the porting request. The contact telephone number of the initiator of the LSR is not needed or used in the industry. If an LSR is submitted incorrectly or needs clarification, the Old Service Provider simply rejects/submits the order back through the path/means by which it received the LSR, e.g., GUI, e-mail, EDI. No call or any other contact is made to the specific initiator. Contact and escalation information is shared between providers prior to the initiation of porting via trading partner profiles.

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We hope that our explanation above is helpful to the Commission in its consideration of the recommendations contained in the NANC's Consensus Document and the Non-Consensus Recommendation on Standard LSR Data Fields. Cox, Comcast and NCTA agree that a standard LSR form with only the eight fields listed above will facilitate the implementation of the Commission's one business day porting interval for simple ports without undue burdens on carriers and undue delays for customers. These eight fields are sufficient to validate and effectuate simple number porting requests.

We understand that the Commission's *Report and Order and Further Notice of Proposed Rulemaking* in the above-captioned proceeding noted its 2007 decision to require no more than four fields to validate simple port requests, but sought comment on the need for "different or additional information fields necessary for completing simple ports" and whether it is "appropriate to standardize Local Service Request forms..." Therefore, the Commission may determine that it should seek input from all interested parties on these proposed lists of LSR fields before taking further action. We would gladly participate in such further proceeding to help the Commission fully develop the record. However, we urge the Commission not to allow the issue of the LSR fields to delay the timely implementation of its important, pro-consumer mandate to shorten the porting interval.

Sincerely,

/s/ Cindy Sheehan

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Cc: Chairman Betty Ann Kane, NANC Chairman
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