

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

Local Number Portability Porting Interval  
and Validation Requirements;

Telephone Number Portability

WC Docket No. 07-244

CC Docket No. 95-116

**COMMENTS OF AT&T INC.**

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## SUMMARY

Working through both the ATIS OBF and LNPA Working Group processes, the NANC submitted a proposal for standardizing and reducing the number of local service request (LSR) data fields to facilitate the new one-business-day porting interval for simple ports. This proposal—referred through throughout these comments as the Majority Recommendation—has reduced the required data fields to 14 in order to safeguard and accelerate the porting process as well as accommodate the needs of the Industry as a whole. These data fields are: Customer Carrier Name Abbreviation (CCNA), Purchase Order Number (PON), Account Number (AN), Desired Due Date (DDD), Requisition Type and Status (REQTYP), Activity (ACT), Company Code (CC), New Network Service Provider (NNSP), Agency Authorization Status (AGAUTH), Number Portability Direction Indicator (NPDI), Telephone Number (TEL NO (INIT)), Zip Code (ZIP), Ported Telephone Number (PORTED NBR), and Version Number (VER).

A group of Cable-TV Providers has challenged this Majority Recommendation and has proposed that the data fields be reduced to eight. Because of these competing proposals, the Commission has requested comments. AT&T supports the Majority Recommendation and urges the Commission to adopt it.

*First*, the Majority Recommendation serves the consumer best by meeting the needs of the Industry at large. The Majority Recommendation promotes quick and accurate number porting, whereas a reduction in the required LSR data fields would jeopardize it.

*Second*, the argument against the Majority Recommendation—that the six data fields in dispute create unnecessary opportunities for errors that will likely result in delay or denial of port requests that harm consumers—is not supported by the facts. As shown by the tested experience of carriers in the wireless-to-wireless porting process, standardization, not data field reduction, is the key to quick and accurate processing of LNP requests.

*Third*, in spite of their contention, the six data fields challenged by the Cable-TV Providers are not extraneous. Each data field serves a purpose in the LNP process and is needed to address concerns of different providers who handle the LNP requests. The eight-field *Cable*

*Proposal* is not the lowest, functioning common denominator; rather, it falls below that mark, depriving some carriers of critical porting information.

*Fourth*, the Majority Recommendation works with existing legacy systems and would be quicker and easier to implement. Eliminating the six required data fields challenged by the Cable-TV Providers would require costly and time-consuming IT work with little benefit. In short, the cost-benefit analysis favors the Majority Recommendation. The impact of the *Cable Proposal* on the Industry at large would be great (*i.e.*, forcing carriers to retool legacy systems and depriving them of critical information); whereas the impact of the Majority Recommendation on the Cable-TV providers in *de minimis* (*i.e.*, six standard, short, and well-known codes amounting to 17 additional keystrokes, which can be pre-populated by the providers).

For these reasons, the Commission should support existing Industry forums and adopt the Majority Recommendation that standardizes 14 required LSR data fields for simple ports subject to the new one-business-day porting interval.

## **COMMENTS OF AT&T INC.**

### **I. BACKGROUND**

On direction from the Commission, the North American Numbering Council (NANC) submitted new local number porting (LNP) provisioning flows to facilitate compliance with the Commission's new one-business-day porting interval for simple ports.<sup>1</sup> At the same time, the NANC also tendered a non-consensus, majority recommendation for standardizing the local service request (LSR) data fields used, among other purposes, for initiating the LNP process itself. The recommendation for standardizing the LSR was developed by the industry in the Ordering and Billing Forum (OBF) of the Alliance for Telecommunications Industry Solutions (ATIS) and then submitted to the NANC's Local Number Portability Administration (LNPA) Working Group, where it was approved by the majority of participants. Briefly, the LNPA Working Group recommendation (Majority Recommendation) standardizes 14 required LSR data fields to be used in connection with a one-business-day port request.<sup>2</sup> Those fields are:

- **CCNA** (Customer Carrier Name Abbreviation)
- **PON** (Purchase Order Number)
- **AN** (Account Number)
- **DDD** (Desired Due Date)
- **REQTYP** (Requisition Type and Status)
- **ACT** (Activity)
- **CC** (Company Code)
- **NNSP** (New Network Service Provider)

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<sup>1</sup> See Letter from Betty Ann Kane, Chairman North American Numbering Council, to Sharon E. Gillett, Chief Wireline Competition Bureau, Federal Communications Commission, WC Docket 07-244 (filed Nov. 2, 2009) (Kane Letter); see also, *Local Number Portability Porting Interval and Validation Requirements, Report and Order and Further Notice of Proposed Rulemaking*, 24 FCC Rcd 6084, para. 10 (2009) (*Porting Interval Order and Further Notice*).

<sup>2</sup> The LNPA Working Group also identified certain LSR data fields that are not "Required" but are deemed "Conditional" and "Optional." AT&T understands that the Commission's focus is on the 14 required data fields. See Attachment 4 to Kane Letter, "Non-Consensus Recommendation from the 'LNPA Working Group Recommended Plan for Implementation of FCC Order 09-41.'"

- **AGAUTH** (Agency Authorization Status)
- **NPDI** (Number Portability Direction Indicator)
- **TEL NO (INIT)** (Telephone Number)
- **ZIP** (Zip Code)
- **PORTED NBR** (Ported Telephone Number)
- **VER** (Version Number)

The intent of the Majority Recommendation was to meet the primary goal of facilitating simple ports within one business day and standardizing and reducing the number of data fields without increasing the likelihood of error or depriving any carrier of information needed for effectuating ports.

On November 19, 2009, a group constituted of Comcast Corporation (Comcast), Cox Communications, Inc. (Cox), and the National Cable & Telecommunications Association (NCTA)—collectively, Cable-TV Providers—submitted an alternative proposal to the Commission further reducing the number of data fields in the LSR from 14 to eight.<sup>3</sup> The Cable-TV Providers proposed keeping the following data fields: Company Code (CC), Purchase Order Number (PON), Account Number (AN), Desired Due Date (DDD), New Network Service provider (NNSP), Zip Code (ZIP), Ported Telephone Number (PORTED NBR), and Version Number (VER). The Cable-TV Providers described the six eliminated data fields as “extraneous.” In response, the Commission published a *Public Notice* seeking comments on these proposals. Specifically, the Commission seeks comments on “what fields are necessary in order to complete simple ports—wireline-to-wireline and intermodal—within the one business day interval.”<sup>4</sup>

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<sup>3</sup> Letter from Cindy Sheehen, Senior Director, National Customer Activation & Repair, Comcast Corporation, Jose Jimenez, Executive Director, Regulatory Affairs-Policy, Cox Communications, Inc., Jerome F. Candelaria, NANC Representative, NCTA, to Sharon E. Gillett, Chief, Wireline Competition Bureau, Federal Communications Commission, WC Docket No. 07-244, CC Docket No. 95-116 (dated Nov. 19, 2009) (*Cable Proposal*).

<sup>4</sup> *Local Number Portability Porting Interval and Validation Requirements*, Public Notice, 75 Fed. Reg. 5013 (2010).

Because AT&T believes that the Majority Recommendation will best serve the interests of consumers and the industry, while facilitating more accurate one-business-day porting, AT&T urges the Commission to adopt the Majority Recommendation.

## II. DISCUSSION

### A. **The interests of consumers are best served when the interests of the industry as a whole are taken into consideration.**

The Majority Recommendation came to the Commission by way of the ATIS OBF. By its own description, ATIS “creates interoperable, implementable, end to end solutions” for the information, entertainment, and communications industry.<sup>5</sup> There are more than 250 communications companies that participate in the ATIS committees, embracing the whole spectrum of the telecommunications industry, including incumbent and competitive local exchange carriers (LECs), wireless carriers, and cable companies. The OBF “provides a forum for representatives from the telecommunications industry to identify, discuss and resolve national issues, which affect ordering, billing, provisioning and exchange of information about access service, other connectivity and related matters.”<sup>6</sup> The Commission has recognized the ATIS OBF contribution to the industry and has encouraged adherence to its industry-based solutions.<sup>7</sup> It is clear then that the ATIS OBF allows the industry as a whole to address an issue like the standardization of the LSR data fields to insure that any proposed ordering solution is not too narrowly tailored to the parochial views of one provider or one group of providers.

In the case of the Majority Recommendation, it was unanimously approved by the OBF participating companies—which included such diverse companies as Bell Canada, Cellular One, Embarq/CenturyLink, One Communications, Sprint, T-Mobile, US Cellular, and Verizon—

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<sup>5</sup> See ATIS web site: <http://www.atis.org/about/>

<sup>6</sup> See <http://www.atis.org/committees/>

<sup>7</sup> See, *Rules and Regulations Implementing, Minimum Customer Account Record, Exchange Obligations on All Local and Interexchange Carriers, Report and Order*, 22 FCC Rcd 22180, 22183 (2007) (“Because ATIS OBF is an established industry forum that includes representatives of both incumbent LECs and competitive LECs, we encourage carriers to adhere to the industry-established guidelines and, where necessary, to work with the OBF industry forum to further develop and refine them.”)

before being sent to the LNPA Working Group.<sup>8</sup> Cox is a member of the OBF but chose not to participate.

For the OBF to get consensus on the minimum number of data fields that must be included to correctly and quickly process an order, the OBF cannot simply find a single provider that uses the fewest data fields and eliminate the rest. Rather, the OBF must work with all providers to make sure that the data fields they need are included, all the while making sure that there no more fields than are reasonably necessary to allow for quick and certain service.

Use of the LSR pre-dates number porting and includes orders for other services. The systems that process orders from LSRs also pre-date number porting. In determining which data fields to require, the OBF had to take these facts into consideration. What may appear to be “extraneous” data fields to Cable-TV Providers are not so for incumbent and competitive LECs. The Cable-TV Providers’ view that certain of these data fields are not necessary probably results from the fact that they use LSRs almost exclusively (if not exclusively) for number porting. To allow one group of providers to dictate the relevant LSR data fields would be to ignore the needs of the rest of the industry.

The central accusation against the so-called extraneous data fields is that they “create unnecessary opportunities for errors that will likely result in delay or denial of port requests that harm consumers.”<sup>9</sup> The Cable-TV Providers offer no support for this claim, because there is none. In fact, the evidence is to the contrary. Today, wireless-to-wireless porting takes place within two and a half hours; yet, a wireless port request can have up to 18 or 20 data fields.<sup>10</sup> As AT&T noted in its Comments to the *Porting Interval Order and Further Notice*, the critical element is *standardization*, not data field reduction.<sup>11</sup> Indeed, as will be discussed below,

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<sup>8</sup> See Attachment 4-C to Kane Letter, providing a complete list of participating companies.

<sup>9</sup> *Cable Proposal*, p. 1.

<sup>10</sup> See, ATIS Unified Ordering Model (UOM); Wireless Intercarrier Communications Interface Specification (WICIS) for Local Number Portability Version 5.0.0, see Section 6.2, Message Element Definitions.

<sup>11</sup> Comments of AT&T Inc., WC Docket 07-244, filed Aug. 3, 2009, pp. 7. See also comments of: Cbeyond, Integra, and One Communications (Joint Commenters), pp. 7-8; MetroPCS, p 8; Nebraska Public Service Commission, p. 7; Sprint, p. 6; T-Mobile, p. 7; Verizon, pp. 4-5; XO, p. 7. And in their October 28, 2009 letter to NANC Chair Betty Anne Kane, Cindy Sheehan, Senior Director, Comcast Corporation and Jose M. Jimenez,

because the Cable-TV Providers essentially use LSRs for porting alone, the so-called extraneous fields will not create opportunities for mistakes as many of the fields require only one or two key strokes or can be pre-populated by the Cable-TV Providers, reducing any potential key-stroke errors.

The *Cable Proposal* appears based on the belief that less is more. Sometimes, however, less is just less. The information in the 14 required data fields won't harm consumers. To the contrary, these data fields will ultimately benefit consumers by facilitating accurate porting and by allowing LECs to use existing LSR systems without added delay or costs.<sup>12</sup> In comparison, the costs imposed on other non-LEC providers, if any, must truly be *de minimis* as they would amount to the costs associated with either typing in or pre-populating six data fields with short, fixed codes. What's more, the required data field information is readily available to the New Service Provider (NSP). And the LECs aren't imposing any obligations on other providers that they aren't also imposing on themselves—both as the NSP and as the Old Service Provider (OSP) in the porting process. In short, consumers benefit from a more accurate process that is essentially already in place, and providers are not disadvantaged competitively or financially by adopting the Majority Recommendation, which builds on the existing LSR processing structure. Hence, the proposed Majority Recommendation provides much needed *standardization*, while not depriving carriers of *critical information* that supports quick and certain porting.

**B. The six disputed data fields are necessary to the number porting process that relies on LSRs and the legacy systems that process them.**

In the *Cable Proposal*, the Cable-TV Providers concede that eight data fields are necessary to *validate and effectuate* a simple port within the newly mandated one-business-day porting interval. For its part, the Commission has previously ruled that three of those eight data

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Executive Director, Cox Communications, Inc. stated that they “agree in principle with the need for such standardization.”

<sup>12</sup> Providers are busy trying to meet the Commission's deadline for implementing the new NANC LNP process flows for one-business-day porting. It is too soon to know whether all providers can meet that deadline without some seeking a waiver of the deadline from the Commission. Regardless, if LECs were required to retool their systems to accommodate a further reduction in LSR data fields, which would be both costly and time consuming, it is almost certain that the present deadline for implementing the new shorter porting interval would not be met.

fields may be required to *validate* simple ports, while acknowledging that there is a dispute among industry members as to the number of fields needed to *effectuate* a simple port.<sup>13</sup>

Through the OBF process, the industry came together and whittled down the number of required data fields in dispute and standardized their meaning.

Focusing on the six remaining data fields, AT&T urges the Commission to support the industry's work for the following reasons:

**1. CCNA**                    The Customer Carrier Name Abbreviation is an industry-defined code used to distinguish one carrier from another or one subsidiary or affiliate of a company from another. Often as a result of mergers and acquisitions, many companies have multiple CCNAs, and these codes allow for more granular identification of the carrier requesting service. For example, CCNAs will identify whether the LSR was submitted by the landline carrier or the wireless carrier of a single company or will distinguish between the network service provider that actually submitted the LSR and the company that will ultimately provide the service to the end-user customer. This code is used by many carriers in downstream processing.

For example, carriers with multiple operational units must have the ability to distinguish between these units when they place their porting requests (*e.g.*, whether the request from the wireless unit, the ILEC unit, or the CLEC unit). OSPs who receive port requests from a large number of trading partners must have the ability to track what service or information went where and to whom. Although some companies may have developed the means to

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<sup>13</sup> *Telephone Number Requirements for IP-Enabled Services Providers; etc., Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking*, 22 FCC Rcd 19531, 19557 (2007) (“[W]e conclude that LNP *validation* should be based on no more than four fields for simple ports (*i.e.*, wireline-to-wireline, wireless-to-wireless, and intermodal ports), and that those fields should be: (1) 10-digit telephone number; (2) customer account number; (3) 5-digit zip code; and (4) pass code (if applicable). We find that, despite disagreement within the industry on which specific data are necessary to *effectuate* a port, there is sufficient basis in the record to support our conclusion that LNP *validation* for simple ports should be based on no more than four fields.”) (Emphasis supplied.)

input the correct CCNA based upon profiles that all of their trading partners were required to submit before issuing even their first LSR, many companies have not. These companies depend upon the NSP to identify itself correctly through the LSR. Loss of this field would require a redesign of these companies' LNP ordering processes.

Cable-TV Providers claim that this code is essentially duplicative of the Company Code (CC) and the New Network Service Provider (NNSP) Identifier.<sup>14</sup> This may be true for some carriers, but it is not true for all carriers. A Company Code (CC) is used to identify the billing party (the company that pays the bills). It is a four-character alphanumeric code established by National Exchange Carrier Association (NECA). The CCNA is a three-letter code assigned by Telcordia Technologies, Inc. (Telcordia), which identifies the company that submitted the LSR and the company to whom response messages must be returned. The NNSP Identifier is not a code, but a field on the LSR where carriers input their Service Provider ID (SPID) code. The SPID code is a four-digit code assigned by the Number Portability Administration Center (NPAC) to identify the company that provides the switch on which the dial tone is provided.

When a single entity performs all three of these functions (*i.e.*, billing, ordering, and providing the network), it might appear to some that the different codes are duplicative.<sup>15</sup> Yet, when more than one entity provides these various functions in a single transaction, the codes distinguish between

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<sup>14</sup> *Cable Proposal*, p. 2. Either the Cable-TV Providers only have one CCNA code each or, if they have more than one CCNA code apiece, the way their businesses are organized makes using the different CCNA codes irrelevant to them. This being the case, each of the Cable-TV Providers would effectively have only one CCNA code to input for each and every LSR they submit. This means, among other things, that error rates would be extremely low to non-existent. Plus, Cable-TV Providers could pre-populate their LSRs with the one CCNA code they use repeatedly. Either way, the burden on other carriers resulting from an order to eliminate this field would be much greater than the alleged burden on the Cable-TV Providers.

<sup>15</sup> Obviously, even if the three different codes point back to the same entity, the three codes are not themselves interchangeable; that is, for example, a company cannot use its Company Code in place of its SPID code.

those entities and their functions, and any appearance of duplication vanishes. Although the Cable-TV Providers may be organized to perform all three functions on every occasion, this is not the case for many providers who rely on third-party ordering vendors and third-party network service providers.

Use of the CCNA code is pervasive in the ordering processing systems of many LECs who trade with many carriers—from small to large. The loss of the CCNA field would stop all automatic flow-through order processing for those companies that presently rely on this field. For example, AT&T's ordering systems use CCNA to determine to whom it will send various order processing messages (*e.g.*, Firm Order Confirmations, error/reject messages, service order completion messages, post-to-bill messages are all returned to the correct carrier based upon the CCNA). In AT&T's Southeast Region, BellSouth Telecommunications, Inc. (AT&T Southeast) depends upon the NSPs to provide it with a CCNA on each LSR. Loss of the CCNA field would require AT&T Southeast to intervene on every LSR so that it could manually input the information. This additional manual processing time would render AT&T Southeast incapable of processing simple port requests within the proscribed one-business-day interval until an alternative process to collect the data upfront from each carrier's operating unit and mechanically populate it on behalf of the requesting carrier is created. Other providers are similarly situated. Consequently, the Cable-TV Providers' claim that these codes—CCNA, CC, and NNSP Identifier (which uses the SPID code)—are duplicative is incorrect.

## **2. REQ TYP**

The Requisition Type and Status code is essential to providers that offer multiple services ordered off the LSR. Carriers use the LSR to request many different types of services, particularly when they are working with the

large incumbent LECs. The types of services carriers order through LSRs include loops, resale, ISDN, UNE, Local Number Portability, *etc.* AT&T uses roughly 20 requisition types. Because the LSR has multiple uses, there must be a means of distinguishing between these services when working with a multiple-services company. This field, and no other, provides that information.

In the *Cable Proposal*, the Cable-TV Providers claim that the REQTYP field information is “redundant and unnecessary.”<sup>16</sup> Seen solely from their perspective, it may be. Cable-TV Providers and wireless carriers do not require this field because they provide only one type of service to their trading partners—port without loop. LECs should not be required to modify the LSR and associated systems to meet the needs of companies like the Cable-TV Providers that do not have multiple requisition types, especially as any cost/benefit analysis would favor the LECs’ argument (*i.e.*, the cost to providers to key in this code is small, while the benefit to LECs and their customers is large, and the costs to LECs to retool their systems is out of proportion to any small keystroke burden imposed on the other providers). Because the Cable-TV Providers will use the same REQTYP code each time, the cost incurred will be truly *de minimis*—basically the time it takes to key in the letter “C.” Loss of this field, on the other hand, would require a complete re-design of LSR processing for both the companies who provide multiple service opportunities, as well as their trading partners.

**3. ACT**                    The Activity field is used in combination with the REQTYP field. While the REQTYP field identifies the type of request, the ACT field identifies the activity and direction of the request. When porting (*i.e.*, the

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<sup>16</sup> *Id.*

REQTYPE code for porting is used), the LSR ACT field has the value of “conversion of service to new CLEC” or “conversion of service to new LSP.” Other REQTYP codes require different values for the ACT field.

Here, the Cable-TV Providers assert that this field is “redundant and unnecessary” because “there is only one possible activity for a Simple Port LSR, *i.e.*, to port the TN.”<sup>17</sup> This is true but it misses the point. If the LSR were used solely for porting, the ACT field would be unnecessary as the activity could be assumed. Where the LSR is used for multiple requisitions, however, the activity cannot be assumed.<sup>18</sup> Loss of this field would require a re-design of LSR order processing for both the companies that offer multiple service types through the LSR, as well as their trading partners. In comparison, the burden on Cable-TV Providers amounts to keying in one single letter—“V.”

**4. AGAUTH**            The Agency Authorization Code is confirmation that the service requestor has end-user authorization to port and to view customer proprietary information. Some industry members indicated a need for this field based upon state regulatory requirements to justify another carrier’s access to the end user’s proprietary information in advance of the actual port.<sup>19</sup>

**5. NPDI**            The Number Portability Direction Indicator code field is used to let the new provider direct the correct administration of E911 records. The Cable-

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<sup>17</sup> *Id.*

<sup>18</sup> Admittedly, LECs could program their systems to logically default to the porting activity when the requisition type is number porting, eliminating the need for the ACT for a porting LSR. But this would still require considerable IT work with its attendant costs and delay. *See*, n.12 *supra*.

<sup>19</sup> Support of this data field in the OBF and LNPA Working Group is justified in the absence of a Commission order pre-empting these state regulations and clarifying that a provider’s submission of an LSR for porting is the provider’s certification that it has the requisite authority. Because existing systems are programmed to require the AGAUTH field information, a change in this area would require IT work with its attendant delay and costs.

TV Providers claim that “it is industry standard to *unlock and migrate* the 911 record at the time of disconnection.”<sup>20</sup> If this were always the case, there would be some merit to their claim that the field is extraneous. In some cases, however, as in wireline-to-wireless ports, the record administration is always to *unlock and delete* the record. Whereas, in the case of intra-modal landline ports, two administrative options are available: (1) sometimes it is *unlock and delete*; (2) sometimes it is *unlock and migrate* to the NSP, and then the record is locked by the NSP. Also, if the end user is both porting and moving to a new service address, the OSP needs to *unlock and delete*, while the NSP creates an entirely new record based upon the new service address (*i.e.*, the record is not migrated). The value populated in the NPDI field distinguishes between these scenarios and drives the different activities.

Cable-TV Providers claim that the NPDI field “is not required for an LSR to port a customer’s TN [telephone number] or to provide an end user’s address for E911 services.”<sup>21</sup> Yet, use of the NPDI field keeps the NSP in control of the E911 record administration, ensuring that the record will be administered according to the needs of the products and services it is providing to the end user. Without this field, other processes must be developed and brought into play so that the integrity of E911 records can be maintained. Given the critical importance of the E911 records, the burden on providers is negligible. It amounts to indicating IN or OUT. Given the benefit to the public at large and the end user specifically, this burden is worth bearing.

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<sup>20</sup> *Cable Proposal*, p. 2.

<sup>21</sup> *Id.*

**6. TEL NO (INIT)** Network service providers need to be able to pass contact information on an order-specific basis so that they can resolve difficulties as quickly as possible. The Telephone Number field can be populated with the number of a consultant or agent that does the requesting carrier's work, a service center where anyone answering a call can provide assistance, or the number of an individual service representative standing by for specialized service assistance. This field is only used when there is some kind of error associated with the LSR. Use of this contact gives the OSP quick access to resources used by the NSP that might allow for quick resolution of the problem.<sup>22</sup>

**C. The net effect of maintaining the Majority Recommendation is to require a few keystrokes that benefit all consumers and most providers and impose almost no costs or burdens on the Cable-TV Providers.**

All of the Majority Recommendation's 14 data fields are in use today on most LSRs; thus, the Majority Recommendation is not introducing new or foreign data values. Just as important, however, is the fact that there is only a 17-keystroke difference between the *Cable Proposal* and the Majority Recommendation. Yet, those 17 keystrokes provide critical information to many providers, whose needs must be accommodated if the porting process is going to be quick and accurate.

Below are two tables comparing the number of keystrokes for the fields recommended in both proposals. *Table 1* consists of the data fields and example values of the eight data fields recommended in the Majority Recommendation and the *Cable Proposal*. *Table 2* contains the six fields challenged by the Cable-TV Providers. Some of the values can only be answered with

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<sup>22</sup> Because the recent changes to the porting rules adds a degree of specificity previously lacking to this area of practice, AT&T suspects that, once the new one-business-day porting interval goes into effect, carriers may be more inclined to bring complaints to the Commission to challenge other carriers' compliance. Should the Commission in this proceeding decide that the TEL NO field should not be a Required field for simple-port LSRs, then the Commission should rule that carriers who choose not to provide this information on an Optional-basis will be precluded from recovering damages for ports that could have been timely completed had a call-back telephone number been provided. Of course, adding the TEL NO information should not mean that there is a presumption either way as to which carrier (NSP or OSP) is at fault for not meeting the new porting interval deadline on any particular occasion.

a single specific value (*e.g.*, REQTYP = C). Note, while the keystrokes are only exemplary, they are typical of the values used today.

TABLE 1

<u>CODE NAME</u>	PON	AN	DDD	CC	NNSP	ZIP	PORTED NBR	VER
<u>EXAMPLE CODE</u>	824Z9	404M231234	20100302	1234	58A0	63112	3145551212	01

TABLE 2

<u>CODE NAME</u>	CCNA	REQTYP	ACT	AGAUTH	NPDI	TELNO
<u>EXAMPLE CODE</u>	ZAB	C	V	Y	C	2021234567

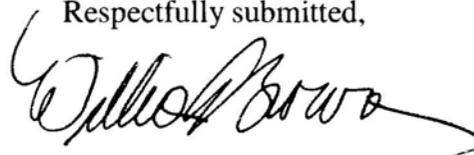
When comparing the benefits gained to the costs imposed, it is clear that the Majority Recommendation with its 14 data fields provides the greatest good with the least amount of cost. The Commission should adopt the Majority Recommendation, which benefits consumers and the industry at large, and reject the more parochial *Cable Proposal*.

### III. CONCLUSION

The Commission should adopt the ATIS OBF Majority Recommendation. First, it will benefit consumers by making porting accurate and effective. Second, there is no evidence that keeping the six challenged data fields would increase error rates. Third, it meets the needs of the industry as a whole, as opposed to a narrow segment. Fourth, any cost-benefit analysis proves that the burdens of cost and time would be greatest on the LECs, who would have to modify yet again these systems, with little benefit to Cable-TV Providers, who would merely have to add a few repetitive, easily obtainable data entries. Adopting the Majority Recommendation is the

surest and quickest way to put in place the mechanism for the new one-business-day porting interval for simple ports.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William A. Brown", with a long, sweeping tail extending to the right.

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