

**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
_____)	

JOINT COMMENTS

Sprint Nextel Corporation, T-Mobile USA, Inc., Verizon,¹ Verizon Wireless, Qwest Corporation, CTIA – The Wireless Association®, and U.S. Cellular Corporation (“Joint Commenters”) submit jointly the following comments in support of the North American Numbering Council (“NANC”) recommendation to adopt a set of 14 standard fields for use in completing simple wireline-to-wireline and intermodal ports. Further, Joint Commenters urge the Commission not simply to adopt the NANC recommendation regarding standardized fields, but to *mandate* compliance with *all* the recommendations contained in NANC’s November 2, 2009 letter to the Commission.²

¹ With the exception of Verizon Wireless, the Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

² 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, with attachments (Nov. 2, 2009). Subsequent to this filing, NANC filed a second letter in which it re-named and resubmitted the attachments. See also 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, Attachments 4, 4-A, 4-B, 4-C (Dec. 2, 2009).

I. BACKGROUND

In its May 13, 2009 *Porting Interval Order and Further Notice*, the Commission directed the NANC to undertake certain work in order to fulfill the Commission's new requirement for a shortened one business day interval for simple wireline-to-wireline and intermodal ports.³ Specifically, the Commission directed NANC as follows:

“We leave it to the industry to work through the mechanics of this new interval. In particular, we direct the NANC to develop new LNP provisioning process flows that take into account this shortened porting interval. In developing these flows, the NANC must address how a “business day” should be construed for purposes of the porting interval, and generally how the porting time should be measured. The NANC must submit these flows to the Commission no later than 90 days after the effective date of this Order.”⁴

Soon after the *Interval Order* was released, the NANC assigned its Local Number Portability Working Group (“LNPA-WG”) to begin the necessary work to meet the above Commission directives. LNPA-WG members concluded quickly that in order to meet the overall objective of a one business day interval, the number of data fields to be used in a Local Service Request (LSR) to facilitate a port between carriers needed to be reduced and standardized.

In order to reduce and standardize the LSR data fields, the LNPA-WG reached out to the Alliance for Telecommunications Industry Solutions (ATIS) Ordering and Billing Forum (OBF). The OBF is an open forum that invites and encourages customers and carriers – wireline, wireless, VoIP and cable providers – “to identify, discuss and resolve national issues which affect ordering, billing, provisioning and exchange of information about access services, other connec-

³ See In the Matter of Local Number Portability Porting Interval and Validation Requirement; Telephone Number Portability, WC Docket No. 07-244, CC Docket No. 95-116, *Report and Order and Further Notice of Proposed Rulemaking*, 24 FCC Rcd 6084, 6095 (2009) (“*Interval Order*”).

⁴ *Id.* at ¶ 10.

tivity and related matters.”⁵ As it pertains to local number portability, the OBF controls the LSR and the Firm Order Confirmation (FOC) process flows which includes the LSR data fields.

While progress was made in reducing the number of fields, parties were unable to reach consensus on the appropriate fields and the appropriate number of fields at the NANC’s October 15, 2009 meeting. As stated in NANC Chairman Kane’s letter to the Wireline Competition Bureau, “There was, however, unanimous agreement by the NANC that some number greater than the four LSR [customer validation] data fields currently mandated by FCC was needed to implement the shortened porting interval and that the LSR data fields should be standardized for all service providers.”⁶

Following the October 15th meeting, parties resumed work in an attempt to reach agreement on a standard set of LSR data fields. Finally, on October 26th, members of the LNPA-WG and OBF and other NANC members reached agreement on a recommendation for a set of 14 standard LSR data fields. These 14 fields were pared down from an initial OBF recommendation for 21 fields.⁷ As described in an *ex parte* letter from ATIS, this recommendation “was agreed to unanimously by all members participating in the OBF’s Local Service Ordering and Provisioning and Wireless Committees, as well as by the OBF Intermodal Subcommittee. The recommenda-

⁵ See <http://www.atis.org/obf/index.asp>. ATIS OBF participants in 2009 included Cox Communications which chose not to participate in the LSR field discussions.

⁶ 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 (Nov. 2, 2009).

⁷ These 21 fields were to be standardized for both simple and non-simple ports. These 21 fields were endorsed by the LNPA-WG, but rejected by the NANC, in part, due to concerns that addressing non-simple ports would be outside the scope of the Commission’s mandate because it applied to simple ports only.

tion is also supported by the NANC Local Number Portability Working Group.”⁸ This recommendation was submitted to the full NANC on October 28, 2009 and later submitted by NANC Chairman Kane to the Commission on November 2, 2009.⁹ Then, on November 19, 2009, the National Cable & Telecommunications Association, Cox Communications, Inc., and Comcast Corporation submitted an alternative proposal recommending a total of eight (8) data fields.¹⁰

II. THE COMMISSION SHOULD ADOPT EXPEDITIOUSLY THE NANC RECOMMENDATION CONCERNING REDUCED AND STANDARDIZED DATA FIELDS

Joint Commenters urge the Commission to adopt expeditiously the November 2, 2009 recommendation submitted by NANC to reduce and standardize the LSR data fields.¹¹ While there has been much debate about the right number of fields and which fields are necessary to accomplish a simple port, the fact of the matter is that the broadest industry consensus is for the 14 fields as submitted by NANC to the Commission on November 2, 2009.

Joint Commenters recognize that some carriers can accomplish ports using fewer than 14 fields while other carriers have built systems that require more than 14 fields. The vast majority of industry, however, understands that there is necessarily some give and take in the consensus building process. The vast majority of industry also understands that standardization and uniformity is of greater importance than the precise number and substance of the fields. Indeed,

⁸ See Letter from Thomas Goode, General Counsel, ATIS, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 07-244, CC Docket 95-116 (October 30, 2009).

⁹ 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 (Nov. 2, 2009).

¹⁰ See Letter from Comcast Corporation, Cox Communications, Inc., and NCTA to Sharon E. Gillett, Chief, Wireline Competition Bureau, Federal Communications Commission, WC Docket 07-244, CC Docket 95-116 (Nov. 19, 2009).

¹¹ See *supra* note 1 at p. 1.

without such standardization it will be difficult, if not impossible, to meet the Commission's mandate for one business day porting. As such, the work performed by ATIS OBF and the LNPA-WG was designed to standardize and minimize the number of fields as appropriate *across the entire industry* rather than a particular segment thereof.

Joint Commenters applaud the work of NANC, the ATIS OBF and the LNPA-WG. Obtaining consensus was difficult; however, participants understood that consensus was imminently necessary so that individual carriers could begin making the changes to support one business day porting and complete all tasks within the short timeframes authorized by the Commission. The fact that the overwhelming majority of carriers has reached consensus on a fundamental change in local number portability practices (*i.e.*, reduced and standardized fields) is significant given the years of gridlock on these issues. As such, Joint Commenters urge the Commission to recognize the tremendous work and cooperative industry effort by adopting the NANC recommendations without further hesitation.

Further, Joint Commenters urge the Commission to adopt the NANC recommendations expeditiously. The present state of uncertainty in this area is causing carriers to lose precious time to make the changes necessary to meet the Commission-mandated implementation dates for one business day porting. The changes required for carriers to meet a one business day interval and to reduce/standardize to 14 LSR data fields are no small tasks and require extensive planning, resources as well as internal and cross-carrier testing. Carriers need to revamp back-office and billing systems, clearinghouse interfaces, intercarrier electronic interface (*e.g.*, carrier GUIs) – necessitating countless hours of IT and engineering/network resources. In addition, carriers need to train customer facing employees and port resolution teams so that they understand the changes to the porting interval and porting processes. And, the Commission's mandate affects

non-carrier entities including third party clearinghouses and the Local Number Portability Administrator.

In short, time is certainly of the essence; continued delay jeopardizes the ability of the industry to meet the Commission's "one business day" mandate. Indeed, if the Commission does not adopt the NANC recommendations including the set of 14 porting fields and/or if the Commission delays its ruling much longer, the Commission should provide carriers with additional time to meet the new porting interval requirement (*i.e.*, extend the current nine and fifteen month implementation periods). To be clear, however, Joint Commenters hope for an expedited ruling. Joint Commenters understand and appreciate that further delay affects competition and harms ultimately American consumers that wish to switch service providers in a timely and efficient manner.

III. THE COMMISSION SHOULD MANDATE COMPLIANCE WITH THE NANC RECOMMENDATIONS

Joint Commenters urge the Commission not simply to adopt the NANC recommendation regarding standardized fields, but to *mandate* compliance with *all* the recommendations contained in NANC's November 2, 2009 letter to the Commission.¹² To date, many carriers have viewed NANC recommendations simply as optional or voluntary guidelines. Without a mandate and resultant uniformity and standardization, the old service provider ("OSP") has been in a position to dictate the porting process to the new service provider ("NSP"). This paradigm has re-

¹² 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, with attachments (Nov. 2, 2009). Subsequent to this filing, NANC filed a second letter in which it re-named and resubmitted the attachments. See also 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, Attachments 4, 4-A, 4-B, 4-C (Dec. 2, 2009).

sulted in a tremendous amount of inefficiency and waste as the NSP must manage to dozens if not hundreds of different carrier-specific porting processes and requirements. And the American consumer has paid the price with unnecessarily long port intervals, delays in porting, and frustrating experiences including “back-and-forths” between the NSP and OSP in which consumers become fed-up and decide to cancel the port.

The Commission has a tremendous opportunity here to change that paradigm once and for all by *mandating* compliance with the NANC recommendations contained in its November 2, 2009 letter. What NANC has proposed is a new, interdependent system – based upon standardization of processes – that will enable carriers to achieve the Commission’s directive of a one business day port. If carriers are permitted to pick and choose or to ignore certain aspects of these recommendations, the system will grind to a halt and consumers will not be able enjoy the shorter, predictable porting interval. In other words, failure to mandate adherence to the NANC recommendations will result in a non-standard porting environment that will make it impossible for a one business day port interval to be consistently implemented across the industry.

IV. CONCLUSION

For the foregoing reasons, Joint Commenters respectfully requests that the Commission take action consistent with the positions expressed above.

Respectfully submitted,

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