

**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

REPLY COMMENTS OF AT&T INC.

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SUMMARY

The majority of commenters clearly support approval of the Majority Recommendation that was produced through the ATIS OBF and LNPA Working Group processes. The Cable-TV Providers—albeit themselves divided—remain the only group that opposes adoption of all 14 required data fields for simple ports. Their opposition is patently driven by their parochial view of the systems and processes used to facilitate number porting. This fact, however, underscores the importance of approving the only recommendation that takes into consideration the concerns of the industry as a whole.

Given the looming deadline for meeting the new one-business-day porting interval, the Commission needs to act quickly on this matter. Affected service providers have been working around the clock since publication of the *Porting Interval Order and Further Notice* to adapt their systems, processes, and policies to meet this deadline. Further holdups in approval or the imposition of new and different data-field requirements will cause significant delays to the efforts to comply with the Commission's nine-month turn around for the new porting interval.

The Commission must also mandate compliance with the standardized 14 required data fields for simple ports. Anything else will create loopholes for less scrupulous providers to use to undermine the Commission's consumer friendly goal of quicker ports.

The Cable-TV Providers have failed to show that compliance with the Majority Recommendation would be burdensome on them or would adversely impact ability of providers to quickly and accurately complete simple ports. On the one hand, the Majority Recommendation imposes only 16 additional keystrokes on the Cable-TV Providers—based on available codes that are well known to all providers and that can be pre-populated into forms and fields; on the other hand, the benefit to the industry as a whole is great. Existing methods of submitting porting requests—while not created solely for simple ports—are sufficiently flexible and user friendly as to allow Cable-TV Providers to input simple-port data quickly and without fear of keystroke error.

Concerns raised in this proceeding about the impact of the NANC process flow on the disclosure of Customer Service Records are beyond the scope of the Commission's Public Notice and belong more appropriately in other contexts. Also, the Commission should reject any effort to make a Pass Code data field *required* for every simple-port request. The Pass Code field should remain optional and be required only by providers who choose to use it to validate a port request.

REPLY COMMENTS OF AT&T INC.

I. INTRODUCTION

The comments filed in this proceeding so far support AT&T Inc.'s (AT&T) assertion that the Commission should adopt the recommendations coming out of the ATIS OBF and LNPA Working Group (Majority Recommendation)—even those comments opposing the adoption of all 14 standardized local service request (LSR) data fields unwittingly provide support. Obviously, the commenters who actively filed in favor of the Majority Recommendation—*i.e.*, The Alliance for Telecommunications Industry Solutions (ATIS), COMPTEL, Joint Commenters (Sprint Nextel Corporation, T-Mobile USA, Inc., Verizon, Verizon Wireless, Qwest Corporation, CTIA-The Wireless Association, and U.S. Cellular), and Mid-sized ILEC Joint Commenters (CenturyLink, Iowa Telecommunications Services, Inc., and Windstream Communications, Inc.)¹—provide excellent witness to both the value of reinforcing the industry process that gave rise to the Majority Recommendation, as well as to the necessity of using all 14 data fields.

But the Cable-TV commenters who challenged the Majority Recommendation—Charter Communications, Inc. (Charter), Comcast Corporation (Comcast), and Cox Communications, Inc. (Cox)²—also give testimony supporting the wisdom of the ATIS OBF approach. Their comments underscore the need to adopt the Majority Recommendation, because these Cable-TV Providers can't agree among themselves as to the number of data fields needed to effectuate a simple port; because their position on the number of data fields keeps changing³; and because their arguments underscore their limited perspective on the number of data fields necessary *for all providers* to effectuate a simple port quickly and accurately. All in all, their comments

¹ The Mid-sized ILEC Joint Commenters support the “porting fields proposal” generally, but take issue with the NANC simple-port processing flow proposal as it applies to the disclosure of an end-user customer's Customer Service Record without prior written authorization and the omission of a pass code field as a required data field for a simple-port request. Mid-sized ILEC Joint Comments, pp. 2, 8.

² AT&T will refer to the joint comments of Comcast and Cox as the “Cox/Comcast Comments.”

³ Compare the November 19, 2009, *Cable Proposal* (Letter from Cindy Sheehan, 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*)) to Cox/Comcast Comments, p. 12.

inadvertently argue in favor adopting the Majority Recommendation, which is the result of industry-wide collaboration.

II. DISCUSSION

A. **The Commission should act quickly to adopt the Majority Recommendation and to mandate that all providers use the ATIS OBF standardized data fields for simple ports.**

In its own comments, AT&T argued in favor of adopting the Majority Recommendation both by defending the industry process that created it and by pointing out the reasons for retaining all 14 data fields for effectuating a simple port.⁴ Other commenters did as well. Those commenters also emphasized other important issues, not the least of which are the need for quick action by the Commission and the necessity that all providers be required to use all 14 of the standardized, required data fields for a simple port.

1. Adopting the Majority Recommendation. None of the commenters claims that the industry process is perfect. But this process has produced a proposal that significantly reduces the number of data fields used for simple ports—even beyond that used by the highly efficient wireless-to-wireless porting process—and has safeguarded the information needed to quickly and accurately port telephone numbers. In describing the objectives of the ATIS OBF process, ATIS noted that “[t]he goal, after all, is not simply to pick the lowest number of fields as some absolute good.”⁵ Instead, faced with both “the inherent complexity of the porting process and the divergent business processes used by service providers,” the ATIS OBF sought to include all data fields “(1) . . . necessary to accomplish a port by those service providers that offer more than a single telecommunications product to other service providers; (2) . . . necessary to satisfy the reduced porting interval of one day established by the Commission; [and] (3) . . . necessary to reduce porting errors that would frustrate [both of the prior objectives].”⁶ In comparison, the *Cable Proposal* sought only to address the needs of the Cable-TV Providers who proposed it.

⁴ AT&T Comments, pp. 6-12. AT&T gave reasons to adopt all 14 required data fields, but went into particular detail about the six data fields challenged by the Cable-TV Providers.

⁵ ATIS Comments, p. 6.

⁶ *Id.* at pp. 4 and 6.

The result of this ATIS OBF process, which was adopted by the majority of the LNPA Working Group, was to reduce the data fields from around 21 to 14. Admittedly some carriers directly involved in developing the Majority Recommendation could accurately and timely effectuate a simple port within the one-business-day interval with fewer than 14 data fields. But as the Joint Commenters noted,

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. . . .As such, the work performed by ATIS OBF and the LNPA-WG [Working Group] was designed to standardize and minimize the number of fields as appropriate *across the entire industry* rather than a particular segment thereof.⁷

The Commission should realize that one of the benefits of the consensus process is that it produces a reasonable middle-ground solution that better allocates the burdens of implementation. Conversely, adopting a “solution” proposed by one segment of the industry alone ensures that other industry segments are more unfairly burdened. The Commission should support and encourage this process especially in light of the progress made by so many diverse carriers on the issue of the number of data fields needed to effectuate a simple port.

2. *Quick Action.* Apart from supporting the industry process, it is urgent for the Commission to act expeditiously to mandate the use of the 14 standardized data fields for a simple port set out in the Majority Recommendation. In its *Porting Interval Order and Further Notice*, the Commission gave all providers subject to the Commission’s local number porting (LNP) rules nine months from the date that the NANC submitted its revised simple-port provisioning flows to comply with the new one-business-day porting interval.⁸ The Commission asserted at the time that it was confident that nine months was “adequate time for providers to make the necessary software changes and upgrades and to accommodate changes to internal

⁷ Joint Comments, pp. 4-5.

⁸ *Local Number Portability Porting Interval and Validation Requirements, Report and Order and Further Notice of Proposed Rulemaking*, 24 FCC Rcd 6084, para. 11 (2009) (*Porting Interval Order and Further Notice*). Note: the NANC submitted its revised provisioning flows to the Commission on November 2, 2009; 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). Consequently, the present deadline to start compliance with the new porting interval is August 2, 2010.

processes and policies.”⁹ In the judgment of many providers, however, accomplishing these tasks within nine months presented a daunting challenge. This challenge is further increased by the fact that even now—just five months before the effective date of the reduced porting interval—the precise requirements of the simple-port mandate are undecided.

To that end, providers began almost immediately—*i.e.*, before the NANC tendered its new process flows—to work on legacy systems, processes, and policies to meet the nine-month deadline. Scrapping those systems and processes entirely was simply not an option, especially if there was to be any hope of meeting the Commission’s deadline.¹⁰ In effect, these providers have been making adjustments on the fly and adapting their systems and processes before, during and after the NANC provisioning-flow process was unfolding. To now deviate significantly from the NANC process flows or the Majority Recommendation would upend this work and guarantee major delays in the ability of some carriers to start processing simple ports by the deadline.¹¹ Instead, the Commission must act quickly to approve the Majority Recommendation to keep the efforts of the industry to modify its systems, processes, and policies on track for the new porting interval deadline.

3. *Mandating Compliance.* Moreover, AT&T, along with other providers and organizations¹², urges the Commission not only to approve the Majority Recommendation straight away, but to *mandate* compliance with it. As the Joint Commenters noted:

⁹ *Porting Interval Order and Further Notice*, 24 FCC Rcd at para. 11.

¹⁰ *See*, Joint Comments, pp. 5-6:

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 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.

¹¹ As it stands, there is no guarantee that all providers can meet the August 2 deadline. The difference may be between some carriers requesting a relatively short extension of time to process simple ports within the new porting interval and many or most carriers seeking significant extensions of time to do so.

¹² ATIS, p. iii (“Quick action is necessary to ensure that the industry can successfully provide end users with a seamless ability to port numbers without procedural delays or errors.”); Joint Comments, p. 5 (“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 on business day porting.”)

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 the position to dictate the porting process to the new service provider (NSP). This paradigm has resulted 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 the OSP in which consumers become fed-up and decide to cancel the port.¹³

In view of the looming deadline for the new porting interval, as well as the problems that an eleventh-hour revision to the Majority Recommendation would cause, the Commission should act quickly to adopt that proposal and to mandate compliance with it.

B. The Commission should reject the attempts of the Cable-TV Providers to derail the efforts of the industry as a whole by claiming inaccurately that the process is burdensome on them.

The one thing that the comments of the Cable-TV Providers proved was that they are not interested in solutions to the LNP simple-port process that serve the needs of the industry *as a whole*. Instead, they seek nothing less than having the rest of the telecommunications industry change their processes solely to accommodate the Cable-TV Providers’ narrow and self-serving eleventh-hour proposal. The Commission must reject the limited vision of the Cable Proposal in favor of the industry-wide solution that obviates the need of a total overhaul of the LSR systems and processes with its attendant costs and delays.

1. Only 16 Additional Keystrokes. In its initial comments, AT&T showed that the difference between meeting the needs of the industry as a whole (*i.e.*, the Majority Recommendation) and serving the interests of a few (*i.e.*, the original *Cable Proposal*) amounted to 17 keystrokes. Now that the Cox/Comcast Comments have amended the original *Cable Proposal* to add another data field (*i.e.*, the Number Portability Direction Indicator (NPDI) field) to their proposal, the difference between the *Cable Proposal* and the Majority Recommendation

¹³ Joint Comments, pp. 6-7.

is now a mere 16 keystrokes.¹⁴ What's more, as highlighted in AT&T's Comments, most of the codes for these data fields amount to one keystroke, which, because the Cable-TV Providers don't offer multiple telecommunications services, are the same in all their porting requests. And, if the Cable-TV Providers so choose, they can be pre-populated by them, which undercuts their flimsy keystroke error argument.¹⁵ Nothing in the comments of the Cable-TV Providers has disproven these assertions.¹⁶

2. *Submitting Requests Is Well-established.* As part of their attack on the use of existing industry-wide systems, Cox and Comcast attempt to portray the submission of a telephone porting request as a dizzyingly complicated array of forms.¹⁷ Cox and Comcast exaggerate their plight.

Not all service providers can or want to use the same methods of submitting service requests. For its part, AT&T has had to allow for the differences among its trading partners. Consequently, AT&T offers three ways to submit service requests: manually, by Graphical User Interface (GUI), and electronically. Because of the flexibility inherent in each of these methods, none presents a significant burden to the trading partner seeking to request that a telephone number be ported.

Under its manual operations, AT&T allows the trading partner to email a request. This process allows the trading partner to "type" its data into the applicable fields on the forms provided to it by AT&T.¹⁸ The trading partner inputs the information on the forms and emails the forms to AT&T. For its part, AT&T scans the forms into its systems by optical scanner. The

¹⁴ Interestingly, Charter proposes a different set of data fields. It proposes deleting the Account Number (AN) field and keeping the Telephone Number (TEL NO (INIT)) field. Charter, p. 2. Consequently, if Charter's position were adopted, there would still only be a 17-keystroke difference between the Charter Proposal and the Majority Recommendation. See AT&T's discussion of the AN field below.

¹⁵ See, *Cable Proposal*, p. 1.

¹⁶ COMPTTEL Comments, p. 3 ("In short, the cable companies have not identified a significant burden in populating the fourteen fields proposed by the NANC LNP WG")

¹⁷ Cox/Comcast Comments, p. 4. ("... the LSR form(s) proposed by the LNPA-WG will continue to include numerous additional fields that are unrelated to a simple port and which must be left empty or the LSR will be rejected. Beyond the visual clutter, extraneous forms and fields greatly increase the complexity of, and opportunity for errors in, [sic] the simple port ordering process.")

¹⁸ The forms AT&T uses are templates developed in Microsoft Word.

trading partner has the ability to copy these forms and modify the information on a request-by-request basis—similar to the GUI systems described below.

AT&T presently has two GUI systems, LEX and LENS, for its trading partners to use when submitting service requests.¹⁹ When one of these two GUI methods is used, the trading partner tells AT&T upfront which product the trading partner wants to order. When the trading partner tells the AT&T system that it wants to port a telephone number, the system automatically provides the trading partner with only those data fields applicable to telephone number porting. Like the different forms a customer would submit manually, there are different screens for the trading partner to use in LEX and LENS. These different screens give the trading partner all the necessary data fields—required, optional, and conditional—needed for the specific service request; based on their end-user customer's needs, the trading partner decides which of these data fields to use. Naturally, because the GUI system is used for more than requesting simple ports alone, there will be more than the 14 fields provided when the trading partner requests to port a telephone number. Nevertheless, when using the LEX system, the trading partner can copy its request and use it as a template for all of its similar requests, including, but not limited to simple ports.

AT&T currently provides its trading partners with several application-to-application (App-to-App) methods to submit LSRs electronically. Effective March 20, 2010, however, there will be only one App-to-App method available for use—AT&T will retire the others.²⁰ When this process is used, data is exchanged between the companies in a real time. There are no forms when a request is submitted App-to-App, the trading partner follows a map or XML schema.

At present, both Cox and Comcast use both GUI and App-to-App methods to submit porting requests. Given the flexibility inherent in these methods, it cannot be said that Cox and Comcast are at all burdened by the submission of telephone number porting requests.

¹⁹ AT&T is retiring the LENS system on March 20, 2010.

²⁰ The one App-to-App method will be the 22-state XML. AT&T believes that the 22-state XML App-to-App is an improvement over the App-to-App methods presently being used by Cox and Comcast.

C. The Commission should approve the Majority Recommendation because the 14 standardized data fields will promote quick and accurate number porting within the new porting interval across the industry.

AT&T went to great lengths in its initial comments to explain the reasons why the then-six disputed data fields were reasonably necessary by many providers to effectuate a simple port. AT&T won't replicate that exercise in these reply comments; however, the Commission should take these additional comments into consideration:

- **CCNA Field:** With respect to this field, Cox and Comcast make the same mistake they made in the initial Cable Proposal—they assert that there is “ample carrier identification information ... in the other fields.”²¹ In both the ATIS Comments and in the AT&T Comments, the distinction and importance of the different carrier/provider identifying fields are explained in detail.²² Suffice it to say that deletion of this data field would deprive carriers of critical information used in the downstream processes and would require costly and time-consuming delays in preparing LEC systems to handle one-business-day simple ports.
- **REQTYP Field:** The position of Cox and Comcast is that the REQTYP field is not needed because for each and every port the value of the field is the same (*i.e.*, “C”). This misses the point. The systems used to process the simple port are used by other providers to offer other telecommunications services. This isn't important to Cox and Comcast, but it is to those LECs that offer these other services and to their trading partners. Those LECs need to distinguish between the types of service request being submitted. This field does that.²³
- **ACT Field:** This field works together with the REQTYP field. Cox and Comcast complain that, if the REQTYP is LNP, then there is only one “activity” that can take

²¹ Cox/Comcast, p. 6.

²² ATIS Comments, p. 10; AT&T Comments, pp. 6-8.

²³ *See*, ATIS Comments, p. 12 (“Without the REQTYP field, there is no way for the Old Service Provider that offers multiple products to determine whether the order received is for local number portability or any other product.”); AT&T Comments, pp. 8-9.

place. As noted in AT&T's Comments, however, 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.²⁴ And Cox's and Comcast's comment about this being a "non-editable" value in AT&T's ordering process highlights the overarching problem with the Cable-TV provider's position—it's too narrowly focused.²⁵ Whether or not this is true for AT&T, what about the rest of the industry?²⁶ The truth is the Cable-TV Providers simply don't care. Regardless, it would take additional time and money just for AT&T and other similarly situated LECs to reprogram their systems to default to the proper Activity when the Requisition Type is telephone number porting. In contrast, the Cable-TV Providers simply type in one character, or pre-populate their request to use that one character, every time.

- AGAUTH Field: In its comments, ATIS notes that the industry agreed that "the porting process must include positive indication of possession of an LOA [Letter of Agency]" without requiring the actual production of it.²⁷ ATIS also pointed out that "[b]y providing a positive indication that the New Service Provider has an LOA, instances of porting in error will decrease." For its part, AT&T recognized that providers who asserted in the industry discussions that state regulators require this sort of positive indication might be assuaged if the Commission were to pre-empt any state regulations effectively requiring this and to clarify that a provider's submission of an LSR for porting is the provider's certification that it has the requisite authority.²⁸ Naturally, 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.

²⁴ AT&T Comments, p. 10. *See also*, ATIS Comments, pp. 12-13.

²⁵ Cox/Comcast Comments, p. 8.

²⁶ The accuracy of the Cox/Comcast statement depends on the meaning of the term "non-editable." As AT&T reads the comments, AT&T believes that Cox/Comcast's statement is not accurate.

²⁷ ATIS Comments, p. 13.

²⁸ AT&T's Comments, p. 10 n. 19.

- TEL NO (INIT) Field: Cox and Comcast claim that use of the Telephone Number Field “may actually delay the porting process.”²⁹ This claim is wholly unsupported. Many providers have found this information particularly useful in completing a port if a post-Firm-Order-Conformation complication arises. As this information most assuredly works to the benefit of the end-user customer seeking to port his or her telephone number, it seems odd to complain about it. If Cox and Comcast think there is no benefit to providing this information, they are free to pre-populate the field with any telephone number they please—it wouldn’t adversely impact the processing of their LSR. Of course they wouldn’t reap the benefit of a quick resolution of a post-FOC complication. Interestingly, a fellow Cable-TV Provider, Charter, believes this field should be kept.³⁰ Charter asserts that “there is little downside in requiring this information.” In short, there is a real benefit to end-user consumers and no burden or detriment to the NSP in having the NSP provide a contact telephone number. Why wouldn’t the Commission want providers to at least try to resolve these sorts of problems with a quick telephone call if possible?
- NPDI Field: Cox and Comcast now concede the importance of this data field. This concession points out the major flaw in the *Cable Proposal*—the failure of the Cable-TV Providers to engage the rest of the industry on these issues. It is entirely possible that in the context of the give-and-take of the industry forums, the Cable-TV Providers might begrudgingly come to recognize that the needs and interests of other providers should be taken into consideration when devising industry-wide ordering processes.

In sum, the industry process, which engaged both the ATIS OBF and the LNPA Working Group, worked by reducing and standardizing the number of required LSR data fields and

²⁹ Cox/Comcast Comments, p. 12.

³⁰ Charter Comments, p. 4 (“Charter deals with over 450 providers in handling number ports....In most cases, whether the contact number is readily available makes the difference between resolving a problem quickly by phone or not.”)

facilitating quick and accurate porting, without racking up unnecessary costs and delays. The Commission should support this process and ratify the Majority Recommendation.

D. The Commission should not exclude the Account Number field from the required LSR fields, should address the Customer Service Record issue in the context of the pending FNPRM, and should allow a Pass Code data field, where applicable.

1. *Account Number Field.* Charter attempts to make the case that the Account Number (AN) field ought to be deleted from both the Majority Recommendation and the *Cable Proposal*.³¹ This field is used by the industry to identify the end-user account, which in some cases may not be the same as the end-user telephone number. Elimination of this field would almost certainly guarantee an increase in porting the wrong telephone number. The importance to the consumer of keeping the AN field cannot be overstated.³²

It is also true that the AN field is one of the four fields that the Commission has ruled may be used by the OSP to validate a port request.³³ In light of this ruling and the adverse impact on consumers if this field were deleted, the Commission should maintain this field as one of the standardized required LSR data fields for simple ports.

2. *Customer Service Records.* The Mid-sized ILEC Commenters argue in favor of editing the NANC process flows to delete references that allow providers to produce Customer Service Records (CSRs) without producing written authorization.³⁴ Whatever the value of this suggestion might be, it is inappropriate for this proceeding, which is aimed *not* at the NANC Process-Flow Recommendation, but rather seeks comments on the Majority Recommendation with respect to the 14 required simple-port data fields, especially in light of the challenge

³¹ Charter Comments, pp. 3-4.

³² See ATIS Comments, p. 11.

³³ *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).”) (Emphasis added.) (*Four Fields Order*)

³⁴ Mid-sized ILEC Commenters, pp. 3-8.

brought by the Cable-TV Providers in their November 19, 2009 proposal.³⁵ It is simply beyond the scope of these proceedings and carriers were not placed on notice that this matter would be entertained. What's more, given the truncated turn-around time for reply comments in this proceeding, it is additionally unfair to ask carriers to respond to this issue now.³⁶

While inappropriate for this proceeding, the concerns of the Mid-sized ILEC Commenters can still be voiced in other venues. *First*, they are free to bring a petition (*e.g.*, a petition for a declaratory ruling) on the legality of the NANC Process-Flow Recommendation on the production of CSRs. *Second*, as the matter of CSRs generally was teed up last August in the comments and reply comments filed in response to the *Porting Interval Order and Further Notice*, the Mid-sized ILEC Commenters are free to file *ex partes* with the Commission on this topic.³⁷ Either way, interested parties would be given more than enough time to address an intricate legal argument on this topic.

3. *Pass Code Field*. As stated above, in the *Four Fields Order*, the Commission ruled that the OSP could use a "pass code" as a data field for telephone number port request validation.³⁸ The Mid-sized ILEC Commenters make much of the fact that the Majority Recommendation's 14 data fields do not include a pass code field.³⁹ Obviously, the "required" ATIS OBF data fields couldn't include a pass code field as that would mean that a pass code field would have to be populated in every case. In many, maybe most, cases a pass code is not required, however. *First*, the customer may not have a pass code associated with his or her account. *Second*, as the *Four Fields Order* does not require a service provider to use all four fields to validate a request, the OSP may decide not to use the pass code as a method of

³⁵ See, *Local Number Portability Porting Interval and Validation Requirements*, Public Notice, 75 Fed. Reg. 5013 (2010).

³⁶ Due to a national holiday, the initial comments in this proceeding were not due until Tuesday, February 16, 2010. As the date for reply comments was not extended, carriers were only given six days to address the issues raised in the comment round.

³⁷ See for example, AT&T's Reply Comments in Docket 07-244, filed Aug. 31, 2009, pp. 10-12.

³⁸ See n.30 *supra*. AT&T understands the term "pass code" to include personal identification numbers (PINs) and passwords.

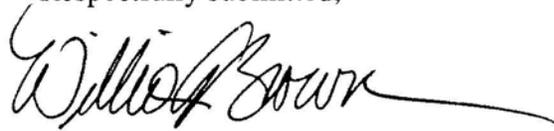
³⁹ Mid-sized ILEC Comments, pp. 9-11.

telephone number port request validation.⁴⁰ As service providers are allowed to use the pass code field as a method of validation, AT&T agrees that the pass code field should be required *when applicable*, but technically remain as an *optional* simple-port data field.

III. CONCLUSION

AT&T urges the Commission to act quickly to adopt the Majority Recommendation and to mandate use of the 14 standardized data fields for simple-port requests.

Respectfully submitted,



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⁴⁰ Under the *Four Fields Order*, the use of the four validation fields is left up to the OSP. *Four Fields Order*, 22 FCC Rcd at 19557 (“LNP validation should be based on *no more than* four fields for simple ports”) (emphasis added).

CERTIFICATE OF SERVICE

I, Lacreteria Hill, do hereby certify that on this 22nd day of February 2010, a copy of the foregoing "Reply Comments of AT&T Inc." in WC Docket No. 07-244 was served via electronic mail or U.S. mail to the parties below.

/s/ Lacreteria Hill

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