



developed by the Alliance for Telecommunications Industry Solutions (ATIS) Ordering & Billing Forum (OBF) for other carriers to submit port requests *to* Verizon. Other carriers, however, require new providers to use a non-standard LSR form to submit port requests to those carriers. In these cases, the new provider must spend a significant amount of time to fill out the LSR correctly, and if the new provider does not use the non-standard LSR required by the old provider, the LSR will be rejected. Verizon and Verizon Wireless must complete over 120 different LSR forms when porting from wireline providers. Commenters agree that a standardized form with common fields developed by the industry for new providers to request ports would allow the LSR to be completed more efficiently and minimize rejects, which delay the porting process.<sup>2</sup>

It is not enough that providers require the same *fields* for port requests. Providers must also use the same *form*. Many providers have unique format requirements, such as forcing new providers to fill out an Excel spreadsheet or Word document, that needlessly delay the submission of port requests, irrespective of the fields themselves. Such delays would continue even if the Commission were to permit providers to require only certain fields as those fields could be placed in different sequences in different types of documents. The Local Number Portability Administration Working Group's (LNPA WG) recommendation to the NANC Implementation Plan addressed this issue by proposing that the Commission require providers to use the current version of the LSR developed by OBF.<sup>3</sup> The Commission should adopt this recommendation to further streamline the porting process.

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<sup>2</sup> See, e.g., Comments of Comcast and Cox at 4 (“[E]xtraneous forms and fields greatly increase the complexity of, and opportunity for errors in, the simple port ordering process.”).

<sup>3</sup> See Non-Consensus Recommendation, North American Numbering Council, WC 07-244, attached as Exhibit 4 (Nov. 2, 2009).

## **II. The Commission Should Permit Providers To Require All 14 of the OBF-Recommended Fields.**

The Commission should not disturb the 14-field recommendation that the industry developed in OBF. Because OBF has developed standard forms that enable provider-to-provider orders and bills to flow smoothly since 1985, it is uniquely qualified to recommend which specific fields should be permitted for a port request. The OBF's collaborative process to determine the recommended fields at issue was open to all providers, including cable companies.<sup>4</sup> The Commission should not second guess OBF's recommendations at the request of a few parties that may have different views, but chose not to express them at OBF.

The cable companies and the rest of the industry agree that certain fields should be required on the LSR. However, to ensure that new providers can readily complete these fields that are not in dispute, the Commission should adopt a process for new providers to obtain the old providers' Customer Service Records (CSR). As NANC recommends in the Implementation Plan, CSRs should be returned within 24 hours and contain any required validation fields, such as Account Number (AN), except for a user-created or -requested password.<sup>5</sup> A quick and effective provider-to-provider CSR process would alleviate Charter's concerns of delay from its new customers being forced to contact their current providers to obtain their Account Number (or other information) and then relay it to Charter to include on the LSR.<sup>6</sup>

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<sup>4</sup> Indeed, Cox, one of the cable companies objecting here, is a member of ATIS and OBF, but does not participate in the OBF Local Service Ordering and Provisioning (LSOP) Committee that recommended the specific fields.

<sup>5</sup> NANC Implementation Plan § 3.5.2, p.25. The California Public Utilities Commission (CA PUC) also supports NANC's recommendations with respect to the CSR process. *See* CA PUC Comments at 8-9.

<sup>6</sup> *See* Charter Comments at 3-4.

Moreover, this CSR process would eliminate any need for the Commission to revisit its determination in the *2007 LNP Order*<sup>7</sup> of which data old providers can require for validating the port request. One of the items the Commission selected is the end user's Account Number.<sup>8</sup> Charter is the only commenter that suggests eliminating the Account Number field, claiming that a customer's Account Number is not necessary to complete the port.<sup>9</sup> Charter, however, misses the distinction the Commission made in the *2007 LNP Order* between information that may be required to validate a port request with that required to "accomplish a port."<sup>10</sup>

The California Public Utilities Commission (CA PUC) makes a similar error when it claims that only four fields may be required on an LSR (although it would not object to three additional fields).<sup>11</sup> Notably, no actual participants in the porting process have filed comments agreeing that the four validation fields are sufficient to accomplish the port. Rather, Comcast and Cox, which are the leading proponents of reducing the number of fields, identify five non-validation fields that "serve to ensure timely porting effectuation."<sup>12</sup>

The other fields recommended by OBF to which Comcast, Cox, and Charter object should also be required. As a threshold matter, there is likely an immaterial effect on the porting process from a provider having to fill out an LSR with fourteen standard fields as compared to the eight fields Comcast and Cox originally proposed. Allowing providers to require only 14 standard fields would eliminate the porting delays that exist today caused by certain providers'

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<sup>7</sup> *Local Number Portability Porting Interval and Validation Requirements, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking*, 22 FCC Rcd 19531 (2007) ("*2007 LNP Order*").

<sup>8</sup> See *id.* ¶ 2 (also allowing validation of port requests based on telephone number, zip code, and password).

<sup>9</sup> See Charter Comments at 3.

<sup>10</sup> *2007 LNP Order* ¶ 47.

<sup>11</sup> See CA PUC Comments at 6-7.

<sup>12</sup> Comcast and Cox Comments at 13.

use of non-standard LSRs. However, further reducing the number of standard fields provides no measurable increase in the ability of new providers to quickly complete the LSR or significant decrease in the risk of the LSR being rejected. The wireless industry, for example, agreed to require 21 fields on the LSR for wireless-to-wireless simple ports (known as the WPR) – i.e., almost *three* times as many fields as Comcast and Cox originally recommended. Even so, the vast majority of wireless-to-wireless simple ports take place within two-and-a-half hours.

Moreover, certain providers may need more fields than other providers to correctly and efficiently process simple ports within the dramatically shortened standard interval. Providers' IT systems, which were designed at different times and in some cases, by companies that were subsequently acquired, may process ports in very different manners. Some providers' systems may rely on the completion of certain LSR fields for their automated processes to function. Because automation is effectively required by the new one business day standard interval if a provider processes a significant number of ports, redesigning systems to allow automation in the absence of information currently provided on the LSR would be extremely costly and require far more time than the *Interval Order's*<sup>13</sup> implementation period allows. As a result, the LSR's standard fields should not be unduly restricted even if certain providers could theoretically process a port with fewer fields.

ATIS has fully explained why each of the 14 recommended fields is necessary for porting to work smoothly in its Comments.<sup>14</sup> (OBF is a committee of ATIS.) In fact, Comcast and Cox now acknowledge the importance of the NPDI (Number Portability Direction Indicator) field, which directs the old provider to take specific steps with respect to a consumer's 911 record. And Charter correctly asserts that the TEL NO (INIT) field, which contains the contact telephone

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<sup>13</sup> *Local Number Portability Porting Interval and Validation Requirements; Telephone Number Portability, Report and Order and Further Notice of Proposed Rulemaking*, 24 FCC Rcd 6084 (2009) ("*Interval Order*").

<sup>14</sup> See ATIS Comments at 10-16.

number of the initiator of the LSR, is important to quickly resolve any issues that may arise. Moreover, Comcast and Cox require this field to be completed by new providers today, demonstrating that it is not “plainly unnecessary and inefficient” as they contend in their comments.<sup>15</sup> Charter’s rationale for supporting the use of this field is that “there is zero risk that ports will be delayed or subject to anticompetitive abuse by requiring use of this field.”<sup>16</sup>

That same logic applies to the remaining four fields recommended by OBF: CCNA – Customer Carrier Name Abbreviation, REQTYP – Requisition Type, ACT – Activity Type, and AGAUTH – Agency Authorization Status. The risk of porting delays, LSR rejects, or “anticompetitive abuse” from an old provider requiring these four fields is trivial because they all can be auto-populated (i.e., hard-coded) by the submitting provider. That is, a new provider can design its process for filling out the LSR so that its employee does not have to physically type the information for those fields into the LSR, thus reducing the chance of a typographical error. Moreover, the four fields meet the criteria the California PUC set forth for not objecting to allowing certain fields apart from the four validation fields. Specifically, they are “useful to enhance clarity and accountability”; are “not specific to the customer”; and “do not require additional information from the customer.”<sup>17</sup>

### **III. The Commission Should Quickly Adopt the OBF Recommendation.**

Verizon and other carriers have been working diligently to make the requisite changes to systems and processes to allow for one-business day simple ports by the effective date of the *Interval Order*. Due to the tremendous scope of this effort, carriers could not wait until the Commission acted on NANC’s Implementation Plan, which was submitted to the Commission almost *four* months ago. Accordingly, Verizon and other carriers made a number of

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<sup>15</sup> Comcast and Cox Comments at 11-12.

<sup>16</sup> Charter Comments at 4.

<sup>17</sup> CA PUC Comments at 5.

implementation decisions based on NANC's recommendation, including an assumption that the 14 fields proposed by OBF would be required. These decisions cannot be easily undone should the Commission reach conclusions materially different from NANC's Implementation Plan. To the extent fewer than 14 fields are permitted on the LSR, Verizon would need an extension of the *Interval Order*'s effective date to make the necessary systems and process changes. And because these changes will affect the coding of all carriers who may port from Verizon, Verizon's wireline business must adhere to the change management process with its standard notification timelines, which include notifying carriers by early April, to ensure that those carriers can complete their systems work and perform tests so that any errors can be corrected before the change occurs.

The wireless community has a similar process. In particular, the wireless community made changes to the Wireless Intercarrier Communications Interface Specification (WICIS), which describes intercarrier communications processes for number portability between wireless providers, to meet new intermodal porting interval. Wireless carriers are currently implementing WICIS Version 5.0.0, which supports the OBF-recommended 14 fields for intermodal ports. To allow sufficient time before the effective date of the *Interval Order* for coordination and collaboration between vendors and carriers to ensure there are no interoperability problems once carriers implement the updated software, the revised version of WICIS had to be completed by early November. Any change to the 14 fields would likely require a new WICIS release, which would require significant, time-consuming work.

Because many other providers would likely require an extension of the *Interval Order*'s effective date if changes were made at this late hour,<sup>18</sup> the Commission should adopt OBF's

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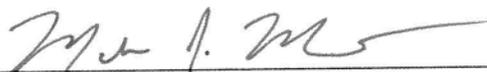
<sup>18</sup> See Comments of Sprint Nextel, et al. at 6.

recommendation in its entirety. This would allow customers to change providers within the shortened interval far sooner.

**CONCLUSION**

For the foregoing reasons, the Commission should take prompt action to require the standardized fields and form proposed by the OBF to ensure that customers can realize the benefits of the shortened standard interval.

Respectfully submitted,

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