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March 25, 2010

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Ex Parte Notice: Local Number Portability Porting Interval and Validation Requirements: Proposals for Standardized Data Fields for Simple Port Requests*, WC Docket No. 07-244

Dear Ms. Dortch:

On March 24, 2010, Grace Koh and Jose Jimenez (by phone) of Cox Communications, Inc. and Beth Choroser, Cindy Sheehan (by phone), and the undersigned of Comcast Corporation met with Bill Dever, Ann Stevens, Heather Hendrickson, Marilyn Jones, Melissa Kirkel, and Michelle Sclater of the Competition Policy Division of the Wireline Competition Bureau to discuss the joint Cox-Comcast position with respect to the proposals for standardized data fields for simple port requests in the above-captioned proceeding.

As an initial matter, we stressed that Cox and Comcast share the Commission's goal of ensuring that consumers benefit from an efficient number porting process. Toward that end, we expressed our appreciation for the Commission's adoption of a next-business-day porting interval and strongly urged the Commission to make adherence to the current timeline for implementation of the new porting interval its top priority.

Number porting must work quickly and smoothly in order for consumers to reap the full benefits of the process. For that reason, we urged the Commission to address unnecessary delays in number porting by (1) minimizing the number of data fields on the Local Service Request (LSR) needed to validate and effectuate a simple port and (2) consolidating the location of those fields to a single LSR form. As a point of clarification, it is our understanding that there is currently no standard simple port request form universally used by the industry.¹ Our comments on these matters were consistent with the Cox-Comcast joint comments filed in this proceeding.

¹ It is our understanding that a small number of providers adopted the ATIS simple port service request. *See, e.g.*, Letter from Thomas Goode, ATIS General Counsel, to Dana Shaffer, Chief, Wireline Competition Bureau, FCC, WC Docket No. 07-244, at 1 (Jan. 16, 2008), and attached *ATIS Simple Port Service Request Preparation Guide* –

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Cox and Comcast also agree with Charter Communications that a simple number port request made in conjunction with directory listing changes should remain classified as a simple port.² However, we believe that the Commission must clarify that a simple port request with all of the FCC-required porting fields correctly completed may not be rejected for next business day porting based on the entries for directory listing changes.

Finally, we urged the Commission to prohibit the misuse of pass codes and PINs to delay the porting process. Unilaterally assigned pass codes work against the shortened porting interval, frustrating consumers and the introduction of competition in rural areas. Accordingly, we recommended that the Commission limit the use of pass codes and PINs as validation fields to only those that are requested and assigned by the end user.

Pursuant to the Commission's rules, this letter is being submitted for inclusion in the public record of the above-referenced proceedings.

Sincerely,

/s/ Mary McManus
Mary McManus

cc: Bill Dever
Ann Stevens
Heather Hendrickson
Marilyn Jones
Melissa Kirkel
Michelle Sclater

Local Service Ordering Guidelines Industry Support Interface, ATIS-0405085-0801. See also *ATIS Simple Port Service Request Preparation Guide – Local Service Ordering Guidelines Industry Support Interface*, ATIS-0405085-0801, Version 3, attached to letter from Thomas Goode, ATIS General Counsel, to Dana Shaffer, Chief, Wireline Competition Bureau, FCC, WC Docket No. 07-244 (July 2, 2008).

² Reply Comments of Charter Communications, Inc., *Local Number Portability Porting Interval and Validation Requirements; Telephone Number Portability*, WC Docket No. 07-244, CC Docket No. 95-116, 5-8 (Feb. 22, 2010).