

June 29, 2010

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Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
12th Street Lobby, TW-A325  
Washington, D.C. 20554

**Re: CenturyLink Petition for Waiver of Deadline, WC Docket No. 07-244 and CC  
Docket No. 95-116.**

Dear Ms. Dortch:

CTIA – The Wireless Association® (“CTIA”) hereby submits this letter in opposition to the CenturyLink petition for waiver of the Federal Communications Commission’s (“FCC” or “Commission”) deadline to implement one-business day number porting.<sup>1</sup> CTIA believes that the Commission’s rules regarding local number portability (“LNP”) facilitate consumer choice by allowing consumers to efficiently port their phone numbers when changing telecommunications providers. The Commission should deny CenturyLink’s petition for waiver because any delay in the implementation of the one-business day porting rule would not serve the public interest.

CTIA and many of its member companies strongly support the Commission’s efforts to streamline the porting process by implementing a “one-business day” requirement for simple wireline and intermodal ports. As the Commission recently noted in the *Standardized Data Fields Order*, porting delays harm consumers and thwart competition, as consumers may attribute delays to their new service providers.<sup>2</sup> Further, “[t]imely implementation of the one-business day simple porting interval is crucial so that both consumers and service providers may begin to realize the benefits of the shortened porting interval.”<sup>3</sup>

CenturyLink’s petition does not demonstrate special circumstances which warrant a waiver of the deadline for implementing the NANC-recommended flows and timers for one-day porting. Although CenturyLink notes the difficulty implementing these flows and timers may cause for its wholesale and retail customers, the Commission’s “one-business day” porting rule applies to “simple” ports which only involve an account for a single line.<sup>4</sup> The Commission’s

<sup>1</sup> *Local Number Portability Porting Interval and Validation Requirements*, WC Docket No. 07-244, Report and Order and Further Notice of Proposed Rulemaking, 24 FCC Rcd 6084 ¶ 1 (2009) (*One-Day Porting Order*).

<sup>2</sup> *Local Number Portability Porting Interval and Validation Requirements*, WC Docket No. 07-244, Report and Order, FCC 10-85 ¶ 8 (May 20, 2010) (*Standardized Data Fields Order*).

<sup>3</sup> *Id.* at ¶ 9.

<sup>4</sup> As the Commission has previously explained, simple ports are those ports that: (1) do not involve unbundled network elements; (2) involve an account only for a single line; (3) do not include complex switch translations (*e.g.*, Centrex, ISDN, AIN services, remote call forwarding, or multiple services on the loop); and (4) do not include a reseller. *Standardized Data Fields Order* at n.3.

“one-business day” porting flows, timers and deadline for implementation provide ample guidance and time to address requests for simple number porting.

CenturyLink’s petition would serve only to delay the implementation of the “one-business day porting” rule without countervailing benefit to the public. Wireless carriers and other telecommunications providers, including CenturyLink, are currently building their systems to meet the NANC-recommended flows and timers for one-day porting, which the Commission correctly adopted in the *Standardized Data Fields Order*.<sup>5</sup> Similar to the Commission’s *One-Day Porting Order*, the benefits of one-business day porting to consumers and competition outweigh the costs associated with implementing these flows and timers.<sup>6</sup> The Commission can best safeguard consumers and encourage competition by ensuring telecommunications providers meet the deadline for implementing these flows and timers.

For the foregoing reasons, the Commission should deny CenturyLink’s petition for waiver which would not serve the public interest.

Respectfully Submitted,

/s/ Matthew Gerst

Counsel, External and State Affairs  
CTIA – The Wireless Association®

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<sup>5</sup> CenturyLink Petition for Waiver of Deadline, WC Docket No. 07-244, CC Docket No. 95-116, at 4 (filed June 7, 2010).

<sup>6</sup> *One-Day Porting Order* at ¶ 12 (granting small providers a longer period of time for implementing the porting interval of one-business day).