



**CenturyLink™**

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July 30, 2010

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**EX PARTE NOTICE**

*Re: Local Number Portability Porting Interval and Validation Requirements, WC  
Docket No. 07-244; Telephone Number Portability, CC Docket No. 95-116.*

Dear Ms. Dortch:

On behalf of CenturyLink, I spoke by telephone with William Dever and Ann Stevens of the Competition Policy Division of the Wireline Competition Bureau on July 29, 2010. We discussed the Petition filed by CenturyLink seeking a limited waiver of the August 2, 2010 deadline for large companies to implement one-day porting. CenturyLink clarified its Petition in several respects.

CenturyLink provided up to date figures for the average numbers of number ports that it processes for other carriers, explaining that it processes 35,000 ports per month on average across all operating companies. Of these, 18%, or approximately 6300 per month, request the current four-day interval, which CenturyLink meets.

CenturyLink explained that the integration of CenturyTel and Embarq systems is proceeding smoothly and meeting or exceeding implementation timelines. Accordingly, CenturyLink provided updated projections for being able to implement one-day porting. Specifically, CenturyLink anticipates that it will be able to meet the one-day porting deadline that applies to small carriers—February 2, 2011. This will involve switching from automated validation of port requests to the temporary use of a manual validation process, likely for over 40% of orders received. This “patch” will be in effect for a period of several months—at considerable additional expense approaching \$1 million above and beyond the cost of implementing automated one-day porting—while the remaining states are converted to the integrated billing system, which will be able to perform automated validation in connection with a one-day port process.

Accordingly, CenturyLink hereby modifies its Petition to seek a waiver only until the small-company deadline of February 2, 2011, instead of May 1, 2011 as originally requested. From a public interest perspective, meeting the small-company deadline should substantially mitigate any concerns. CenturyLink serves predominately rural areas, which are similar to the areas typically served by small companies. Indeed, many of CenturyLink’s operating companies are treated as small companies for many purposes under the Communications Act. Nor would the industry-wide implementation of one-day porting be affected significantly if CenturyLink were to proceed in the second phase as opposed to the first phase.

CenturyLink further explained that, as the Commission recognized and made a condition of its approval of the merger of CenturyTel and Embarq, CenturyLink is in the process of consolidating its wholesale provisioning onto the integrated platform using the Embarq wholesale provisioning process, which is also being modified to accommodate one-day porting. The consolidation of wholesale provisioning will be completed by the October 1 commitment deadline as stated in the Petition and required by the Commission's order approving the merger. It is not possible to continue with the transition and make other system changes simultaneously, nor could any other changes to the wholesale provisioning systems be completed any more quickly given the scale and complexity involved. In addition, the NANC-specified process that governs how companies interact during a number port does not appear to accommodate partial compliance with one-day porting as it is designed for companies to be providing either one-day porting or four-day porting.

Pursuant to Section 1.1206(b) of the Commission's rules, one copy of this electronic notice is being filed in each of the above-referenced dockets. Please contact me if you have any questions or need anything else.

Sincerely,



Jeffrey S Lanning

cc: William Dever  
Ann Stevens