

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Verizon and Verizon Wireless	)	WC Docket No. 11-95
Petition for Declaratory Ruling	)	

**COMMENTS OF COMCAST CORPORATION**

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Comcast Corporation (“Comcast”) and its affiliates hereby submit these comments in response to Verizon’s Petition for Declaratory Ruling in the above-captioned proceeding.<sup>1</sup>

**I. INTRODUCTION AND SUMMARY**

The local number portability (“LNP”) database currently is used to perform three types of porting activities: (1) Type 0 ports – inter-service provider ports in which a customer and his or her telephone number are being transferred from one service provider to another; (2) Type 1 ports – intra-service provider ports in which a single service provider is porting a number within its own network; and (3) Type 2 ports – “pooled block” transactions, primarily those in which an entire thousands-block of numbers is assigned to a new blockholder. Pursuant to the methodology established by the Federal Communications Commission (“FCC” or “Commission”) in the *Third Report and Order*,<sup>2</sup> the industry currently recovers the shared costs of administering these ports, including LNP Type 1 ports, from all carriers based on their relative share of interstate end user revenues.

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<sup>1</sup> *Pleading Cycle Established for Comments on Verizon and Verizon Wireless Petition for Declaratory Ruling*, WC Docket No. 11-95, Public Notice, DA 11-973 (rel. June 1, 2011).

<sup>2</sup> *See generally Telephone Number Portability*, Third Report and Order, 13 FCC Rcd 11701 (1998) (“*Third R&O*” or “*Third Report and Order*”).

Verizon's petition seeks a declaratory ruling that would change the manner in which the costs of completing Type 1 ports are recovered. Specifically, under Verizon's proposal, the costs of such ports and certain "modifies" of the Number Portability Administration Center ("NPAC") database would "be excluded from shared costs" and paid for by each provider on a usage-sensitive basis.<sup>3</sup>

Verizon's request ignores a critical fact that causes competitive local exchange carriers ("LECs") to use the NPAC in a manner that is very different from incumbent LECs. The latter obtained most of their North American Numbering Plan ("NANP") numbers prior to the advent of number portability and implementation of the FCC's numbering resource optimization rules. As a result of these historical differences, Comcast and other competitive LECs must rely on Type 1 ports to manage their NANP numbers much more frequently than their incumbent LEC rivals. Verizon's proposal would assess a per-transaction fee on competitive LECs each time they requested a Type 1 port. Incumbent LECs would not be subject to such a charge for the vast majority of their comparable intra-service provider ports because, solely as a result of their incumbent status, they are able to use the Local Exchange Routing Guide ("LERG") to accomplish the same changes. Hence, the Verizon proposal would impose a discriminatory assessment on the number porting activities of competitive LECs while concurrently reducing the portion of the total NPAC administrative costs that are recovered on a shared basis. For that reason alone, the petition should be summarily denied.

In addition, because the discriminatory changes in the recovery of NPAC costs recommended by Verizon are contrary to the Commission's current rules, Verizon's proposal

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<sup>3</sup> See generally *Petition of Verizon and Verizon Wireless for Declaratory Ruling to Assess NPAC Database Intra-Provider Transaction Costs on the Requesting Provider*, WC Docket No. 11-95 (May 20, 2011, filed May 31, 2011) ("Verizon Petition").

may only be considered through the issuance of a notice of proposed rulemaking. In the resulting proceeding, the Commission would have to undertake a comprehensive review of the current cost recovery system in order to avoid piece-meal changes like that proposed by Verizon, which could have significant anti-competitive effects.

## **II. ADOPTION OF THE RULE CHANGE PROPOSED BY VERIZON WOULD HAVE SIGNIFICANT ANTI-COMPETITIVE EFFECTS ON COMPETITIVE LECS**

Verizon's proposal is substantively and irreparably flawed because it would have a significant discriminatory and anti-competitive impact on Verizon's competitive LEC rivals. As Comcast demonstrates below: (1) Verizon's proposal would shift a disproportionate share of number portability administrative costs to competitive LECs; and (2) Verizon overstates the ability of providers to minimize number porting transactions that would be subject to the proposed usage charge.

### **A. Verizon's Proposal Would Disproportionately and Negatively Impact Competitive LECs, While Unfairly Benefiting Incumbent LECs**

The Communications Act requires that LNP costs be recovered from "all telecommunications carriers on a competitively neutral basis."<sup>4</sup> The Commission has interpreted this competitive neutrality requirement to mean that LNP and pooling cost recovery "must not give one service provider an appreciable, incremental cost advantage over another service provider when competing for a specific subscriber" and "must not disparately affect the ability of competing service providers to earn a normal return."<sup>5</sup> Consequently, the Commission's current cost recovery system allocates most of the costs

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<sup>4</sup> 47 U.S.C. § 251(e)(2).

<sup>5</sup> *Third R&O* ¶ 53.

incurred by the administrator among all carriers in accordance with their relative shares of interstate end user revenues.

The Commission's concern about the potential anti-competitive effects of a usage-based charge is one of the principal reasons it decided to allocate shared costs on the basis of relative revenues in the *Third Report and Order*:

[U]sage-sensitive distribution of the shared costs could “give one service provider an appreciable, incremental cost advantage over another service provider when competing for a specific subscriber,” as well as “disparately affect the ability of competing service providers to earn a normal return.” . . . Moreover, assessing shared costs on a usage-sensitive basis could discourage carriers from performing uploads and downloads, or at least penalize those carriers that do so more frequently.<sup>6</sup>

The Commission's concern that the LNP cost recovery rules not place at a competitive disadvantage certain classes of carriers that are forced to complete number porting activities more frequently than other classes of carriers continues to be a compelling public interest basis for rejecting Verizon's proposal.

In contrast to the current cost recovery system, Verizon's proposal would shift a disproportionate and discriminatory share of these costs to competitive LECs. Specifically, Verizon recommends that a per-transaction charge be assessed on Type 1 number ports – a procedure that, as explained below, competitive LECs must use far more frequently for intra-service provider ports than their incumbent LEC rivals. Verizon's proposal also would unjustly reduce the total costs that are recovered on a shared basis.

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<sup>6</sup> *Third R&O* ¶¶ 88-89. See also *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574, ¶ 207 (2000) (noting that the allocation of costs on a per number charge would “penalize new CLECs or other carriers . . . that require large quantities of numbers to provide their services”).

Verizon erroneously asserts that “[n]o possible policy interest can justify requiring a provider to pay for transactions to implement its competitor’s network updates or reorganizations.”<sup>7</sup> To the contrary, the Commission has recognized that “all telecommunications carriers . . . benefit from number portability,”<sup>8</sup> because “all carriers that port telephone numbers and all carriers that terminate calls to portability-capable NXXs depend on the timely uploading and downloading of information to and from the regional databases to ensure an accurate database and the proper routing of telephone calls.”<sup>9</sup> This is no less true with respect to LNP Type 1 porting activities than any other type of port, because “[c]arriers serving customers with ported numbers must keep routing information within the NPAC database current for the benefit of all customers and carriers.”<sup>10</sup>

As several parties previously have noted in LNP proceedings before the Commission, “additional functions of NPAC [such as carrying out network grooms, making technological upgrades, and fixing errors in various calling databases] better serve the industry and consumers.”<sup>11</sup> Because incumbents continue to control the vast majority of customers,

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<sup>7</sup> Verizon Petition at 12.

<sup>8</sup> *Third R&O* ¶ 114.

<sup>9</sup> *Id.* ¶ 89.

<sup>10</sup> Letter from Sara Cole, Manager, Federal Affairs, TDS Metrocom, to Marlene H. Dortch, Secretary, FCC, RM-11299, at 2 (May 25, 2007) (“TDS May 2007 *Ex Parte* Letter”).

<sup>11</sup> Reply Comments of NuVox Communications, Inc., XO Communications Services, Inc. and Xspedius Communications, LLC, RM-11299, at 10 (Feb. 6, 2006). *See also* Comments of T-Mobile USA, Inc., RM-11299, at 11 (Jan. 5, 2006) (“Carriers . . . benefit from a healthy and competitive market, because the innovative services and equipment that competition fosters typically increases consumer demand and overall market growth. As such, carriers benefit from LNP even if they are not directly involved in every port transaction. Likewise, consumers and carriers benefit from number pooling, which optimizes the efficiency with which numbering resources are used and delays the costs and burdens that accompany area code relief and eventually NANP expansion. The bottom line is that competition and numbering resource optimization provide tremendous benefits to both consumers and carriers alike regardless of their involvement, if any, in specific porting

incumbent LECs “earn far more revenue from their overwhelming market share than any other carrier, and thus they benefit more from a healthy telecommunications market than any other carrier.”<sup>12</sup> Adopting Verizon’s proposal would, therefore, inequitably allow incumbent LECs to reap a large share of the benefits of number porting and pooling without paying their proportionate share of the related costs.

Given both the harms to local competition and the undue benefits to incumbent LECs that would flow from implementation of Verizon’s proposal, the Commission should reject Verizon’s proposal for the same reasons it originally rejected a usage-sensitive charge for allocating all shared LNP costs.

**B. Verizon Overstates the Ability of Providers to Minimize the Use of Type 1 Ports and Fails to Consider the Costs of Its Proposal**

As noted above, competitive LECs must rely far more heavily on Type 1 ports to implement intra-service provider ports than incumbent LECs. In particular, because most of the NANP numbers assigned to incumbent LECs were obtained prior to the adoption of number portability and the numbering resource optimization rules, incumbent LECs are able to migrate numbers to new switches and complete other tasks without needing access to the

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transactions, which is why the public interest is served by requiring carriers collectively to bear shared LNP and pooling costs.”) (“T-Mobile Jan. 2006 Comments”).

<sup>12</sup> T-Mobile Jan. 2006 Comments at 13. *See also* Letter from J.G. Harrington, Counsel to Cox Communications, Inc., to Marlene H. Dortch, Secretary, FCC, RM-11299, at 2 (June 21, 2007) (“Verizon’s focus on transactions initiated by competitive LECs . . . demonstrates that its real theory is that incumbent carriers do not cause number portability costs. This theory ignores that incumbent carriers hold the vast majority of the telephone numbers in the database and that they operate the vast majority of the switches that use the database. In other words, incumbent carriers actually have the most to gain from the efficient operation of the number portability database because they need it to route much more traffic than competitive LECs.”) (“Cox June 2007 *Ex Parte* Letter”).

NPAC database. Contrary to Verizon’s claims, Comcast and other competitive LECs cannot use the LERG as an alternative to a Type 1 port.

### 1. Ability to Use the LERG for Intra-Service Provider Ports

Verizon asserts that “[t]here are a variety of alternatives to engaging in intra-service provider transactions and ‘modifies.’”<sup>13</sup> It further notes that “Verizon will typically structure its network migrations so that it uses the Telcordia LERG Routing Guide . . . to move NXX codes to different serving switches, rather than creating additional NPAC transactions by porting the telephone numbers.”<sup>14</sup>

Verizon’s assertion ignores the fact that the LERG can only be used for ports involving so-called “A block” numbers.<sup>15</sup> Following implementation of the Commission’s numbering resource optimization rules, only incumbent carriers have a high percentage of such A block numbers. In contrast, all other carriers have a small inventory of A block numbers and a much larger inventory of pooled thousands-block numbers. While A block numbers are routed via the LERG, pooled thousands-block numbers are routed via a Local Routing Number (“LRN”).<sup>16</sup> The only way to change the routing path for these numbers is to change the LRN – an activity that requires an LNP Type 1 intra-service provider port. As industry standards-setting body Alliance for Telecommunications Industry Solutions

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<sup>13</sup> Verizon Petition at 8.

<sup>14</sup> *Id.*

<sup>15</sup> See Telecordia Technologies, *Telecordia LERG Routing Guide* § 2.2, LERG6 (NPA NXX BLOCK information) (Dec. 1, 2010) (“NPA NXX assignments (those made by the CO Code Administrator) are represented with a BLOCK value of ‘A.’ Thousands Block Pooling assignments (those made by the Pooling Administrator) are represented by numeric BLOCK values (0-9).”).

<sup>16</sup> See Telecordia Technologies, *Telecordia LERG Routing Guide* § 3.1 (Dec. 1, 2010) (“An LRN is a ten-digit number, based on an NPA NXX assigned to a Service Provider that is designated by the Service Provider to route ported numbers within the NANP.”)

(“ATIS”) has observed, “[t]he actual distribution of [telephone numbers] from a shared thousands-block will not be captured in the LERG Routing Guide.”<sup>17</sup> The difference between competitive LECs such as Comcast and incumbent LECs such as Verizon is striking. As derived from information contained in LERG6, less than 15 percent of Comcast’s central office codes could be routed via the LERG, whereas almost 98 percent of Verizon’s central office codes could be routed in this manner.

Thus, the Verizon proposal would unfairly impose a per-transaction charge on competitive LECs for a number port that incumbent LECs can accomplish without incurring the same cost simply as a result of historical differences.<sup>18</sup> Such an anti-competitive effect would be contrary to the public interest and the Commission’s commitment to promoting a competitive marketplace for voice service.<sup>19</sup>

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<sup>17</sup> Alliance for Telecommunications Industry Solutions, Inc., ATIS-0300066, *Thousands-Block Number (NXX-X) Pooling Administration Guidelines* § 3.5 (Feb. 14, 2011); see also Letter from Thomas Cohen, counsel for XO Communications, to Marlene H. Dortch, Secretary, FCC, RM-11299, at 3 (Apr. 19, 2007) (“Virtually all of XO’s modifications are implemented at the individual telephone number level . . . so when it seeks to make modifications to individual telephone numbers for purposes of ensuring proper porting, it can only do this through a transaction with the NPAC and not the LERG. This stands in contrast to the practices of the incumbent providers. . . . [B]ecause the incumbents either do not need to access any database or can access their own for most calls, they can simply rely on the routing information in the LERG.”) (“XO April 2007 *Ex Parte* Letter”).

<sup>18</sup> See TDS May 2007 *Ex Parte* Letter at 2-3 (“Competitive LECs, by the very nature of their customer bases, have a higher percentage of their overall numbers that must be maintained via the NPAC databases in order to ensure proper routing. Given the fact that CLECs have such a large proportion of their numbers that must be served by the NPAC, CLECs have a disproportionate number of [NPAC] transactions, including intra-carrier transactions. Adopting BellSouth’s or Verizon’s proposals would increase CLECs costs to maintain accurate routing information relative to ILECs for the same function.”).

<sup>19</sup> As XO has noted, “[i]t is important to understand at the outset of any discussion on cost recovery for LNP and [number pooling] that [incumbent LECs] have inherent advantages in accessing and using numbers.” XO April 2007 *Ex Parte* Letter at 1.

## 2. Ability to Avoid or Minimize Intra-Service Provider Ports

Verizon also asserts disingenuously that LNP Type 1 ports are “elective,” implying that all providers can “lessen the[] frequency” of intra-service provider ports by “invest[ing] significant time and effort during the planning phases of . . . projects to ensure that the NPAC is utilized only when necessary to minimize the transactions that are generated.”<sup>20</sup> In reality, however, as Cox previously has noted:

[T]here are significant network management reasons for Type 1 porting events. For instance, reconfiguration, load balancing, and porting unassigned numbers to a new switch are not steps a carrier undertakes merely for its own convenience; each is a part of proper network management, which benefits all customers. In some cases, such as porting unassigned numbers to a new switch, the change will help to conserve numbering resources, which benefits all carriers in the same way as pooling. In addition, some of these events are the results of decisions by incumbent carriers or regulators, such as changes in rate center boundaries, which may require competitive carriers to modify their number assignment practices.<sup>21</sup>

Verizon’s Petition fails to mention the fact that the number resource optimization rules require numbers to be assigned solely at the rate center level, rather than at the switch and rate center levels.<sup>22</sup> Thus, where a rate center contains multiple switches, many competitive LECs, including Comcast, must assign the entire thousands-number block to a single switch. After the initial allocation is made, assigning the numbers to the appropriate

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<sup>20</sup> Verizon Petition at 5, 8.

<sup>21</sup> Cox June 2007 *Ex Parte* Letter at 3.

<sup>22</sup> 47 C.F.R. § 52.20(a) (thousands-block number pooling allocates blocks of numbers on a rate center basis); *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574, ¶ 185 (2000) (concluding that “each thousands block pool should be confined to a rate center”) (“*Numbering Resource R&O*”); see also Telecordia Technologies, *Telecordia LERG Routing Guide* § 3.1 (Dec. 1, 2010) (defining “Rate Center” and indicating that “LERG6 files ‘map’ NPA NXX’s (and BLOCK IDs) to Rate Centers”).

switch within the multi-switch rate center becomes the responsibility of the carrier. In order to ensure that a customer's terminating calls are routed to the switch that actually serves its location, the competitive LEC must complete an LNP Type 1 port that modifies the LRN table by including the correct switch. As ATIS concludes, a service provider that is allocated a thousands-block to a single switch "will be allowed to use intra-service provider ports . . . to share that thousands-block across their multiple switches in a rate center."<sup>23</sup> In contrast, incumbent LECs such as Verizon need not complete this Type 1 port in order to route a customer's traffic to the appropriate switch because they were permitted to keep numbers that were already assigned at *both* the rate center and switch levels.<sup>24</sup> Accordingly, contrary to Verizon's suggestion that such intra-service provider ports are optional network changes, in fact competitive LECs have "no choice but to perform uploads associated with intracompany porting that might upon first review be discretionary."<sup>25</sup>

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<sup>23</sup> Alliance for Telecommunications Industry Solutions, Inc., ATIS-0300066, *Thousands-Block Number (NXX-X) Pooling Administration Guidelines* § 3.5 (Nov. 12, 2010); *see also id.* at § 14 (defining "Intra-Service Provider Port" and explaining that "[a]n intra-service provider port can . . . be used to move a [telephone number] from one switch serving a rate center to another switch serving the same rate center where LRN-LNP technology is in use").

<sup>24</sup> *See Numbering Resource R&O* ¶ 116 n.236 ("Historically, network routing mechanisms are based upon the understanding that geographic numbers are assigned on an NXX code basis and associated with a specific switch . . ."); *id.* ¶ 172 n.413 ("Historically, geographic numbers are assigned on an NXX code basis and associated with a specific switch and the network address to which the call must be routed is embedded in the first six digits (NPA-NXX) of the called number. With thousands-block number pooling, all 10,000 numbers available in the NXX code are allocated within one rate center, but are allocated to multiple service providers in thousand number blocks, instead of to one particular service provider.").

<sup>25</sup> Reply Comments of Time Warner Telecom, RM-11299, at 5-6 (Feb. 6, 2006); *see also id.* ("For example, TWTC introduces new IP-based switches to serve rate centers already served by its legacy circuit switches. Under the Commission's number optimization rules, TWTC may not obtain a new block of numbers for a new IP switch if TWTC has not met the necessary utilization threshold for the block of numbers assigned to TWTC's legacy switch serving the same geographic area. . . . While this rule is an appropriate restraint on

### 3. Costs of Implementing Verizon's Proposal

Verizon's Petition fails to address the potential costs of its proposal. A transition to any form of usage-based system likely would involve significant transaction costs, requiring the creation of usage accounts, a revised billing system, an auditing process, and a billing dispute resolution system. As Cox previously has noted, "[t]he costs of [creating such billing systems] could be substantial, and would be borne by all carriers and, ultimately, their customers."<sup>26</sup> Thus, if the Commission decided to consider Verizon's petition in the context of a comprehensive rulemaking proceeding, detailed information regarding the costs of implementing a usage-based charge for number ports would be required.<sup>27</sup>

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number usage, it leaves TWTC no choice but to port numbers from its legacy switch to its new IP switch. Such intracompany porting is therefore non-discretionary, and it advances the Commission's number optimization policy goals. Accordingly, the costs incurred by the database administrator to process the uploads and downloads associated with such intracompany porting should be recovered in the same manner as other LNP/pooling shared industry costs.").

<sup>26</sup> Cox June 2007 *Ex Parte* Letter at 5.

<sup>27</sup> In an Executive Order issued earlier this week, President Obama concluded that "[w]ise regulatory decisions depend on public participation and on careful analysis of the likely consequences of regulation . . . [and] such decisions should be made only after consideration of their costs and benefits (both quantitative and qualitative)." *Regulation and Independent Regulatory Agencies*, White House Executive Order (rel. July 11, 2011), available at: <<http://www.whitehouse.gov/the-press-office/2011/07/11/executive-order-regulation-and-independent-regulatory-agencies>>. Chairman Genachowski has actively supported this regulatory reform initiative. See, e.g., *Statement from FCC Chairman Julius Genachowski on the Executive Order on Regulatory Reform and Independent Agencies*, FCC News Release (rel. July 11, 2011), available at: <[http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2011/db0711/DOC-308340A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0711/DOC-308340A1.pdf)> ("I welcome the President's Executive Order today. . . . Shortly after the President's initial Executive Order, I directed FCC staff to follow the spirit of the Order. We had already . . . incorporated cost-benefit analysis into our decision-making.").

### III. THE CHANGES PROPOSED BY VERIZON MAY ONLY BE ADOPTED IN A COMPREHENSIVE NOTICE AND COMMENT RULEMAKING PROCEEDING

LNP Type 1 ports consistently have been treated as shared costs subject to section 52.32 of the Commission's rules. Additionally, the Commission's principles prohibit a cost recovery method from providing any carrier an "appreciable, incremental cost advantage" or "disparately affect[ing] . . . competing service providers."<sup>28</sup> In the *Third Report and Order*, the Commission expressly rejected a proposal to recover shared costs on a usage-sensitive basis, finding that "[t]he entire industry benefits from the maintenance of reliable regional databases for providing number portability."<sup>29</sup> As explained above, Verizon's proposal to assess a charge on a carrier each time it requires a Type 1 intra-carrier port is inconsistent with this cost recovery system.

Although Verizon characterizes its pleading as a declaratory ruling request, its proposal would fundamentally alter the Commission's well-established mechanism for LNP cost recovery that is intended to prevent a disparate impact on competitive carriers. Courts have held repeatedly that "an agency seeking to repeal or modify a legislative rule promulgated by means of notice and comment rulemaking is obligated to undertake similar procedures to accomplish such modification or repeal."<sup>30</sup> Consequently, under the

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<sup>28</sup> *Third R&O* ¶ 53.

<sup>29</sup> *Id.* ¶ 89.

<sup>30</sup> *Am. Fed'n of Gov't Employees v. FLRA*, 777 F.2d 751, 759 (D.C. Cir. 1985) (citation omitted). See also, e.g., *Consumer Energy Council of Am. v. FERC*, 673 F.2d 425, 446 (D.C. Cir. 1982) ("[T]he APA expressly contemplates that notice and an opportunity to comment will be provided prior to agency decisions to repeal a rule."). The same requirements extend to Commission interpretations of existing rules. See, e.g., *Menkes v. United States Dep't of Homeland Sec.*, 637 F.3d 319, 344 (D.C. Cir. 2011) ("[O]nce an agency gives its regulation a definitive interpretation, 'it can only change that interpretation as it would formally modify the regulation itself: through the process of notice and comment rulemaking.'") (citations omitted); *Env'tl. Integrity Project v. EPA*, 425 F.3d 992, 995 (D.C. Cir. 2005) ("[A]n

Administrative Procedure Act (“APA”), the Commission must commence a notice and comment rulemaking proceeding in order to consider the requested change.<sup>31</sup>

Moreover, Verizon’s proposal is a compelling example of the potential adverse consequences of attempting selectively to modify the current mechanism for recovering number portability costs. The anti-competitive effects of Verizon’s piecemeal proposal highlight the fact that any effort to revise the present regime must be undertaken on a comprehensive basis.<sup>32</sup> Specifically, such a review must, *inter alia*: (1) take into account the significant differences in the ways in which incumbent LECs and competitive LECs obtained numbers and therefore use the number portability database; and (2) avoid changes that would shift a disproportionate share of the costs of maintaining and operating the database to one segment of the industry. Such a comprehensive review can only be conducted through a notice and comment rulemaking proceeding.

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interpretation of a legislative rule ‘cannot be modified without the notice and comment procedure that would be required to change the underlying regulation.’”) (citations omitted).

<sup>31</sup> Because the Wireline Competition Bureau lacks legal authority to grant the relief requested by Verizon through issuance of a declaratory ruling, North American Portability Management and the administrator similarly do not have authority to implement the changes proposed by Verizon.

<sup>32</sup> The Commission repeatedly has emphasized the importance of comprehensive reform efforts. *See, e.g., Federal-State Joint Board on Universal Service*, Notice of Proposed Rulemaking, 19 FCC Rcd 10800, ¶¶ 35, 119, 126 (2004) (noting that the Commission should take actions that “avoid the perils of piecemeal decision-making”).

**IV. CONCLUSION**

For the foregoing reasons, the Commission should deny Verizon's Petition for Declaratory Ruling.

Respectfully submitted,

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July 15, 2011

## **Certificate of Service**

I hereby certify that on this 15th day of July, 2011, true and correct copies of the foregoing Comments of Comcast Corporation were mailed by electronic mail to:

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