

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of  Local Number Portability Porting Interval And Validation Requirements;  Telephone Number Portability	  WC Docket No. 07-244  CC Docket No. 95-116
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**REPLY COMMENTS OF LEVEL 3 COMMUNICATIONS, LLC**

**INTRODUCTION**

Level 3 Communications, LLC (“Level 3”) submits these reply comments in support of the North American Numbering Council’s (NANC’s) proposed “Best Practice #67.”<sup>1</sup> Level 3 was one of the principal participants in the development of Best Practice 67, and supports the conclusions approved by the NANC. Level 3 believes that Commission adoption of Best Practice #67 will eliminate the long-standing industry confusion surrounding when a port request should be handled within the standard four-business-day porting interval.

**II. LEVEL 3 SUPPORTS BEST PRACTICE #67**

Level 3, as one of the principal proponents of Best Practice #67, agrees with CenturyLink that the process defined in Best Practice #67 “successfully balances and resolves the competing interests in efficient, accurate, and timely processing of port requests.”<sup>2</sup> While Level 3 also

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<sup>1</sup> See *Comment Sought on North American Numbering Council Proposal For Standardized Minimum Thresholds and Intervals For Non-Simple Ports and “Projects,”* WC Docket No 07-244, CC Docket No. 95-116, Public Notice (Sept. 30, 2011).

<sup>2</sup> Comments of CenturyLink, WC Docket No 07-244, CC Docket No. 95-116 at 2.

agrees with AT&T's overall support for Best Practice #67, Level 3 and AT&T differ in their interpretation of what Best Practice #67 does and does not accomplish. For instance, Level 3 does not agree with AT&T that "BP67 was not intended to subject a port request with up to 50 TNs that also involves unbundled network elements or complex switch translations to the four-business-day interval."<sup>3</sup> Level 3 believes that Best Practice #67 provides the appropriate detail and definitions necessary for carriers to successfully process port requests that may be considered non-simple ports or port projects.

Ultimately, Level 3 supports Best Practice #67 because it: 1) further standardizes the local number portability ("LNP") process for all carriers; 2) reduces the exploitation of process loopholes by carriers, which result in increased numbers of customer LNP escalations; 3) forces industry to improve efficiencies by investing in replacement of, or upgrades to, outdated processes and systems; 4) improves competition amongst carriers; 5) aligns the wireline LNP process more closely with the highly competitive and extremely standardized wireless LNP process; and 6) allows consumers to enjoy improved porting intervals, efficiencies, standardization, and a more competitive LNP environment. It is for these reasons that Level believes the FCC should adopt Best Practice #67.

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<sup>3</sup> Comments of AT&T, Inc. WC Docket No 07-244, CC Docket No. 95-116 at 5.

## CONCLUSION

Level 3 reiterates its support for best Practice #67. As a principal participant in the development of Best Practice 67, Level 3 agrees with the conclusions approved by the NANC. Commission adoption of Best Practice #67 will eliminate the long-standing industry confusion surrounding when a port request should be handled within the standard four-business-day porting interval.

Respectfully submitted,

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