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Via Electronic Submission

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

Re: Written Ex Parte Communication
Local Number Portability Interval and Validation
Requirements, WC Docket No. 07-244 and
Telephone Number Portability, CC Docket No. 95-116

Dear Ms. Dortch:

Sprint Nextel Corporation (“Sprint”) files this letter in support of the North American Numbering Council’s (“NANC”) Local Number Portability Administration Working Group (“LNPA-WG”) Best Practice 67 concerning non-simple ports.

Sprint shares the Commission’s oft-stated objectives for local number portability: “to ensure that consumers are able to port their telephone numbers efficiently and to enhance competition for all communications services.” Furthering these objectives, Sprint participated in the LNPA-WG to develop Best Practice 67, which establishes, *inter alia*, a four business day porting interval for non-simple ports of 50 or fewer telephone numbers. This best practice is designed to ensure that providers adhere to a common understanding of non-simple ports and a common goal of achieving such ports in a timely, consumer-friendly manner.

With regard to the concerns raised in comments filed by AT&T, the Commission should reject the suggestion that Best Practice 67 is too unclear.¹ In particular, AT&T claims that Best Practice 67 is subject to various interpretations as to the types of ports that would be subject to the four business day interval. However, AT&T relies on a strained reading of the Best Practice when it asserts that the interval “would apply to what would otherwise be a ‘simple port’ *but for the number of lines in the account.*”² Nowhere in Best Practice 67 is any such limitation, and AT&T points to no text in Best

¹ See AT&T Comments at 3-6.

² *Id.* at 4.

Practice 67 that could be considered ambiguous. As a result, Best Practice 67 applies more broadly than AT&T suggests and encompasses ports that involve complex switch translations and resellers. This approach, which reflects the consensus of the industry participants in the LNPA-WG, thus allows more customers to qualify for a shortened porting interval. The fact that the porting-out service provider may have to work more efficiently to complete the steps to facilitate the port should not outweigh the undisputed benefit to customers of being able to quickly change providers.³

AT&T's other concern, that Best Practice 67 modifies the existing porting interval for non-simple ports involving unbundled network elements, is also unfounded. AT&T correctly points out the operative sentences in the NANC LNP Provisioning Flows: "It is assumed that the porting interval is not in addition to intervals for other requested services (e.g., unbundled loops) related to the porting request. *The interval becomes the longest single interval required for the services requested.*"⁴ These two sentences are retained in the NANC Flows that incorporate Best Practice 67. In fact, the Best Practice's porting intervals are placed directly in front of those operative sentences. As such, Best Practice 67 creates no ambiguity in the NANC Flows' porting intervals related to unbundled network elements.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Sincerely,

/s/ Scott R. Freiermuth

³ *Id.* at 6.

⁴ AT&T Comments at 5 (citing Wireline Non-Simple Port LSR/FOC Process Flow (Figure 5 Step 13)).