

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

LOCAL NUMBER PORTABILITY (LNP))	
ADMINISTRATION CONTRACT)	WC DOCKET NO. 09-109
)	WC DOCKET NO. 07-149
)	CC DOCKET NO. 95-116
)	

COMMENTS OF THE IDAHO PUBLIC UTILITIES COMMISSION

The Wireline Competition Bureau on August 13, 2012, released notice that it seeks comment on the proposed Request for Proposal (RFP) for local number portability (LNP) database platforms and services in the United States, and the associated Technical Requirements Document (TRD) and Vendor Qualification Surveys. The Idaho Public Utilities Commission (“Commission”) respectfully submits comments in support of the work accomplished by the Selection Working Group (“Working Group”), the North American Portability Management, LLC (“NAPM”) and the North American Numbering Council (“Council”) in drafting the number portability administration Request for Proposal (“RFP”). The RFP requires strong neutrality and high performance standards and presents important questions regarding a potential dual-vendor approach.

Neutrality

The Idaho Commission supports the work of the Working Group, NAPM, and Council in making neutrality a key facet of the RFP. A vendor that is too closely aligned with any carrier or industry segment may, even inadvertently, favor that carrier or industry segment to the detriment of other carriers and customers. The administrator must be an impartial entity to ensure that all numbers port according to the proper timeframes, and that all service providers,

and ultimately their customers, receive fair and equal treatment. The number one priority for porting service must be the consumer. Often the porting of a consumer's number is the very first service performed by a new provider on behalf of its customer. The Idaho Commission supports making a neutrality requirement for the number portability administrator as strong as those of the North American Number Plan Administrator and the National Pooling Administrator.

Performance

The Idaho Commission supports the Working Group, NAPM, and the Council in making performance a significant evaluation criteria. A high level of performance by the portability administrator is important to ensuring competitive and efficient markets by providing consumers an efficient, seamless and positive porting experience. In addition, a high level of performance is critical to many key FCC initiatives that rely on the portability database.

With diversity and rapid advances within the telecommunication industry such as wireline, wireless or interconnected VoIP services, number portability has allowed millions of customers to choose between competing service providers and technologies. It is imperative that the administrator and carriers maintain effective working relationships to help shorten porting timeframes with ever-increasing porting volumes. Customers have become accustomed to successful porting of their numbers without worry of delay or mistakes.

The Working Group, NAPM, Council and FCC should ensure that as potential administrators are considered through this RFP process, the quality of service provided by each administrator is at least equal to the service level provided to date. The FCC should ensure the selection process does not compromise the efficiency of number portability as consumers experience it today.

Dual Vendors

The RFP recognizes the possibility that multiple vendors may be selected, but acknowledges multiple vendors may create inefficiencies and additional costs, and so appropriately asks vendors to explain how those concerns can be ameliorated. The RFP does not address the decision process to determine which of the seven regions will be served by the established vendor, and which will get a new vendor, should a multiple vendor approach be adopted.

It is inevitable that any new administrator will experience start up issues, some of which could noticeably affect service. This could result in less efficient service levels for customers in one region compared to the service provided by another vendor in a separate region. It is possible that seamlessness in number porting could be compromised with multiple vendors and the Idaho Commission encourages careful review of multiple vendors to ameliorate this possibility.

The Idaho Commission appreciates the work of the Working Group, NAPM, and the Council in preparing the terms of the RFP. With due consideration to neutrality and high standards of porting administration, the Idaho Commission is confident the RFP process will result in efficient, seamless number porting for customers.

Respectfully submitted this 11th day of September 2012.

FOR THE IDAHO PUBLIC UTILITIES COMMISSION

By: 

Weldon B. Stutzman
Deputy Attorney General
472 W. Washington Street (83702)
PO Box 83720
Boise, ID 83720-0074
(208) 334-0318
E-mail: weldon.stutzman@puc.idaho.gov

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