

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matters of	)	
	)	
Local Number Portability Porting Interval and Validation Requirements	)	WC Docket No. 07-244
	)	
Telephone Number Portability	)	CC Docket No. 95-116

COMMENTS OF CENTURYLINK

CenturyLink hereby responds to the *Public Notice* put out by the Wireline Competition Bureau, seeking comment on two filings by the North American Numbering Council (NANC).<sup>1</sup> The first, dated September 19, 2012, requests a clarification “that the imposition of a carrier-initiated passcode is prohibited for any port request, whether simple or non-simple.”<sup>2</sup> The second, dated December 10, 2012, requests the Commission’s formal adoption of certain clarifying revisions to the NANC LNP Provisioning Flows.<sup>3</sup> CenturyLink supports the NANC position regarding both communications and urges the Bureau to issue the requested clarifications.

---

<sup>1</sup> *Public Notice*, Comments Sought on North American Numbering Council Requests for Clarification of Use of Passcodes for Non-Simple Ports and Local Number Portability Provisioning Flows, DA 13-1178, rel. May 22, 2013.

<sup>2</sup> NANC September 19, 2012 Letter, page 1.

<sup>3</sup> NANC December 10, 2012 Letter. The NANC sought formal approval of its revised process flows in line with the Commission’s determination that the provisioning flows it approved in the 2010 *LNP Standard Fields Order* would remain legally applicable unless or until the Chief of the Wireline Competition Bureau, on delegated authority, approved NANC recommendations for revised provisioning process flows. *Local Number Portability Porting Interval and Validation Requirements; Telephone Number Portability*, Report and Order (*LNP Standard Fields Order*), 25 FCC Rcd. 6953, 6965 ¶ 22 (2010). “Revised provisioning flows that are approved by the Bureau and made available to the public through the NANC’s website are binding on the industry.” (Footnote omitted.)

## **Carrier-Initiated Passcodes and Non-Simple Ports**

Like the Bureau, CenturyLink believes that the passcode matter addressed by the *Public Notice* has already been resolved in the Commission's *LNP Standard Fields Order*.<sup>4</sup> There the Commission adopted the NANC provisioning flows and required industry participants to abide by those flows.<sup>5</sup> Those flows already addressed the issue of carrier-initiated passcodes,<sup>6</sup> prohibiting their use in all porting situations. Accordingly, CenturyLink supports the relief requested by the NANC and urges the Bureau to declare that carrier-initiated passcodes cannot be demanded by an Old Local Service Provider (OLSP) in either a simple or a non-simple porting context. This is the only conclusion that can fairly be drawn by existing Commission precedent.

Yet, since the Commission specifically codified the prohibition against OLSPs demanding carrier-initiated passcodes from New Local Service Providers (NLSP) only in its rule dealing with simple ports (*see* 47 C.F.R. § 52.26) some OLSPs believe they can demand such passcodes in the context of non-simple ports. Such conclusion is clearly incorrect.

In adopting the NANC LNP Provisioning Flows in 2010, it was clear that the Commission did not consider those flows limited to just simple ports. In paragraph 24 of that *Order* the Commission stated:

---

<sup>4</sup> *Public Notice* at 1, referencing the *LNP Standard Fields Order* at 6964, n. 74 (“However, carrier-assigned passcodes may not be required in order to obtain a CSR. *See* NANC Nov. 2, 2009 Ex Parte Letter, Attach. 1, Sec. 3.2., at 18 (“Any Service Provider assigned password/PIN may not be utilized as a requirement in order to obtain a CSR.”)).

<sup>5</sup> *LNP Standard Fields Order* at 6962-63 ¶ 18 (“We adopt the NANC’s recommended provisioning flows in support of the porting process and require the industry to adhere to them . . . . As with previous flows, we find that the provisioning process flows recommended by the NANC will ensure that communications between service providers and database administrators proceed in a clear and orderly fashion so that porting requests can be handled in an efficient and timely manner.”) (Footnotes omitted.)

<sup>6</sup> *See* note 4, *supra*.

As in the past, the provisioning process flows the NANC recommends today address the processes for both simple and non-simple ports. We agree that the NANC's recommended provisioning process flows should address both simple and non-simple ports as it would be impracticable to address one without the other.<sup>7</sup>

And one of the provisioning flows adopted by the Commission in its *LNP Standard Fields Order* dealt with Port Type Determination, where NLSP requests for Customer Service Records (CSR) from OLSPs is addressed. That flow stated (and continues to state) in part:

Only passwords/PINs requested and assigned by the End User may be utilized as an End User validation field on an incoming LSR by the Old Network Service Provider/Old Local Service Provider. Any service provider assigned password/PIN may not be utilized as a requirement in order to obtain a CSR.

The above language occurs in the provisioning flows text prior to classification of the port by the NLSP as simple or non-simple (Steps 8-10).

For the above reasons, CenturyLink supports the NANC request that the Bureau “clarify” by way of declaration that OLSPs are prohibited from asking NLSPs for carrier-initiated passcodes before they release a CSR to a requesting NLSP.

### **Clarification of Port Cancellation and Disconnect Flows**

The *Public Notice* also inquires about the NANC's December, 2012 communication asking that the Bureau approve certain revisions to its LNP Provisioning Flows, specifically those flows dealing with cancellations and disconnections of service. The primary purpose for the revisions was to make explicit that an OLSP (or Old Network Service Provider (ONSP)) was permitted, acting at the request of an end user, to cancel an end user's prior port request with a NLSP. CenturyLink supports the NANC's recommended revisions.

CenturyLink has long accepted port cancellation requests from OLSPs/ONSPs, acting on behalf of their end users. After all, the porting rules lodge the “right” to port in the end user and

---

<sup>7</sup> *LNP Standard Fields Order* at 6966. (Footnote omitted.)

the end user has the concomitant right to cancel the port.<sup>8</sup> The issue of who orders the port cancellation (whether the new or old service provider) is an administrative exercise.

The revisions to “Cancellation Flows for Provisioning Process, Cancel Flow, Figure 12” are meant to make more explicit that an OLSP, with proper customer authorization, can execute a cancellation of a pending port request (although it is not required to do so) and to provide some detail as to how such a cancellation should occur. The revisions address the situations where some NLSPs have refused to accept cancellation requests from OLSPs, requiring end users to contact them directly to cancel an anticipated port-in. Such demands are at odds with an end user’s right to control whether her number gets ported. Moreover, end users may be reluctant to call the NLSP with whom they do not yet have a working relationship, preferring to communicate with their existing provider (and possibly to avoid what they might anticipate will be an unwelcome attempt to get them to change their mind about the cancellation). For these reasons, CenturyLink supports those revisions.

Respectfully submitted,

CENTURYLINK

By: /s/Kathryn Marie Krause  
Kathryn Marie Krause  
1099 New York Avenue, N.W.  
Suite 250  
Washington, DC 20001  
303-992-2502  
[Kathryn.Krause@CenturyLink.com](mailto:Kathryn.Krause@CenturyLink.com)

Its Attorney

June 5, 2013

---

<sup>8</sup> “The term ‘number portability’ means the ability of users of telecommunications service to retain . . . existing telecommunications numbers without impairment of . . . convenience when switching from one telecommunications carrier to another.” 47 C.F.R. § 52.21(n).