

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Local Number Portability Interval and Validation Requirements)	WC Docket No. 07-244
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
Numbering Resource Optimization)	CC Docket No. 99-200

COMMENTS OF CENTURYLINK

I. CENTURYLINK SUPPORTS THE ADOPTION OF NANC BEST PRACTICES 65 AND 30.

CenturyLink supports the North American Numbering Council (NANC) report recommending the Commission approve NANC's proposed Best Practices (BP) 65 (addressing the problems associated with ports that get activated prior to the carriers' prior agreed-upon Final Order Confirmation (FOC) due date) and 30 (reflecting industry's general preference for area code overlays rather than splits).¹ We also support the NANC recommendation to modify existing LNP Process Flows to allow for port-outs immediately after an area code change, rather than requiring a 5-day wait to engage in such ports. All of NANC's recommendations are in the public interest, since they reduce the potential for negative customer experiences and promote greater carrier efficiency and numbering management.²

¹ See NANC Report on Local Number Portability Best Practice 65 submitted Oct. 17, 2013.

² The Commission publicly noticed the NANC report and its associated recommendations in mid-December, asking for comment. See *Public Notice*, DA 13-2367, rel. Dec. 12, 2013. With respect to the matter of port-out restrictions after area code changes (associated with the deletion of certain language associated with existing LNP process flows), the *Public Notice* states that this topic was addressed by Qwest Communications International Inc. in a Petition for Clarification and/or Reconsideration, filed on July 22, 2010 in WC Docket No. 07-244 and

II. THE ADOPTION OF NANC’S PROPOSED BEST PRACTICES IS IN THE PUBLIC INTEREST BECAUSE THEY ALIGN WITH CUSTOMER EXPECTATIONS AND PROMOTE NUMBER CONSERVATION.

A. Port Activations Contrary To Carriers’ Prior Agreements Result In Confusing Traffic Delivery And Potential Negative Service Impacts To Customers.

Like the NANC, we believe that activating port outs in advance of carriers’ previously agreed-upon due dates adversely affects customer service. It was that concern that prompted CenturyLink to propose the modification of existing BP 65.³ While a strong argument can be made that the existing BP 65 already prohibited the activation of a port prior to the agreed-upon due date, there appeared to be some in the industry that did not read the BP that way.

By way of background, existing BP 65 was approved by the NANC Local Number Portability Administration Working Group (LNPA WG) in March 2010 and was subsequently endorsed by the full NANC in May of that year. The main purpose of the BP was to memorialize the industry’s expectation that carriers should follow the ATIS Ordering and Billing Forum (OBF) Local Service Request (LSR) guidelines. Those guidelines call for New Network Service Providers to send supplemental communications to Old Network Service Providers in the event a change needs to be made to the originally agreed upon port out due date (which simultaneously triggers a disconnection of the customer’s existing service).

Despite the existence of BP 65, CenturyLink began experiencing problems at the end of 2012 with certain wireless ports when a particular carrier started activating ports within minutes of receiving a FOC from CenturyLink, rather than waiting for the due date that *that carrier itself* had initially requested and that was reflected in CenturyLink’s confirming FOC.

CC Docket No. 95-116. As discussed in footnote 5, Qwest’s filing had nothing to do with the matter being noticed in the current *Public Notice*.

³ The existing BP can be found at <http://www.npac.com/lnpa-working-group/lnp-best-practices#0065>.

The consequence of the carrier failing to conform its porting conduct to the existing BP was that the NPAC activated the port record prior to the agreed upon due date. This caused calls originating *outside* of the CenturyLink switch and destined for the end user to *immediately* be sent to the offending wireless carrier rather than to CenturyLink. On the other hand, calls originating within the CenturyLink switch and destined for the same individual were continuing to be processed in CenturyLink's landline network until CenturyLink disconnected the customer's service (which would be on the agreed-upon port out date).

This could have quite an unexpected and potentially disturbing impact on the individual who -- at that point in time and until disconnected (which could be days away) -- remained a CenturyLink customer. Calls originating outside the CenturyLink network would be ringing to the wireless phone so the customer could easily assume that her carrier conversion had taken place in total. Indeed, she might unplug her landline phones and discard them. Yet, no call originating from the CenturyLink switch that continued to serve her would terminate on her wireless phone until the official disconnect date (which was the originally agreed-upon port out date). As a result, the individual would miss calls from any caller where the call originated at the CenturyLink switch, perhaps missing important, urgent or even emergency calls. *And* this situation could go on for days.

The potential adverse customer impacts from activating port outs prematurely are obvious. The situation represented not only bad business and bad customer service but was contrary to the industry's expectations of the port-out process reflected in the then-existing LNP Process Flows. Those Flows gave Old Service Providers (which would have been CenturyLink in the above example) options as to when they would be disconnecting the customer's service and number on its network, with all options being based on the Old and New Network Service

Providers having an agreed-upon due date and time for the port.⁴

To remedy the negative customer service impacts that might be experienced by the Old Network Service Provider's (still existing) customer, the LNP Process Flows were modified. Supporting as we do BP 65 itself, CenturyLink also supports the NANC's proposed change to the current LNP process flows that will make very clear the operational requirement that ports are not to take place prior to the carriers' mutually agreed-upon due date absent a second communication (confirmed by the Old Network Service Provider) that the date change is acceptable. CenturyLink supports this change and the remediation of negative service impacts to its customers.

B. CenturyLink Supports The Ability Of Carriers To Immediately Be Able To Port Out Numbers After Area Code Relief.

The *Public Notice* asks for comment on modifications to existing LNP process flows associated with Figure 5, Step 13 of those flows. It describes the proposed change as involving "the porting due date of the first telephone number in a multi-number port," and states that the topic is the subject of a Petition for Clarification and/or Reconsideration filed by Qwest Communications International Inc. in July of 2010.

CenturyLink supports the actual NANC recommendation regarding the modification of Figure 5, Step 13, but notes that the description contained in the *Public Notice* is inaccurate (as is the reference to a Qwest Petition for Clarification and/or Reconsideration).⁵ The modification

⁴ See Flow AA, Figure 10, step 9 and Flow A, Figure 9, Step 6.

⁵ The Qwest Petition for Clarification and/or Reconsideration is not relevant to the issue of porting after area-code relief. That filing had to do with a statement of the Commission in one of its *Local Number Portability Orders* that ports, other than simple ports, had to be completed in four business days. See *Local Number Portability Porting Interval and Validation Requirements; Telephone Number Portability*, Report and Order, 25 FCC Rcd 6953 (2010). The comment did not take into account that there are very complex ports and large multi-line ports that can take *much* longer than four days to process. The Commission never responded to our

being requested by NANC has to do with changing the first port out allowed after the creation of a new NPA-NXX. This request was based on work done by the LNPA WG and the NANC in September 2013.

The old process had a 5-day delay after a new code opened before the first port-out could take place. The proposed new NANC process allows the first port-out to occur the same day the new code opens.⁶ The LNPA WG reached consensus to eliminate the 5-day-delay interval and the change became effective in July 2013.

C. Area Code Overlays Are Preferable To Splits And NANC's BP 30 Should Be Adopted.

In its October 17, 2013 report, the NANC also recommends approval of BP 30, a best practice intended to address implementation of area code overlays versus area code splits. CenturyLink supports the adoption of BP 30. After outlining the pro's and con's of both overlays and splits, BP 30 reflects the LNPA WG recommendation that a code overlay should generally be implemented rather than an area code split, when there is a demonstrated need for

petition. The industry, however, promulgated BP 67 to address the matter. That BP includes a chart to assist providers in determining what intervals are reasonable based on the type and quantity of ports being done. The NANC endorsed BP 67 on May 17, 2011 and requested the Commission to adopt it. The Commission, rather, put the matter out for public comment in September of 2011 (DA 11-1558) and has done nothing since. *See* Public Notice, 26 FCC Rcd 13026 (2011).

⁶ *See* Version 4.2.1 as provided by the NANC in its October, 2013 filing.

area code relief. An overlay most often best limits adverse impacts to customers. CenturyLink concurs in the determinations reflected in BP 30.

Respectfully submitted,

CENTURYLINK

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