

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Numbering Policies for Modern Communications;	WC Docket No. 13-97
IP-Enabled Services;	WC Docket No. 04-36
Telephone Number Requirements for IP-Enabled Services Providers;	WC Docket No. 07-243
Telephone Number Portability;	CC Docket No. 95-116
Developing a Unified Intercarrier Compensation Regime;	CC Docket No. 01-92
Connect America Fund;	WC Docket No. 10-90
Number Resource Optimization;	CC Docket No. 99-200
Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources; and	
Petition of TeleCommunications Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules	

COMMENTS OF AT&T

AT&T Services, Inc., on behalf of its affiliated companies, (AT&T) files these reply comments in response to the Wireline Competition Bureau's (Bureau) Report, released on January 31, 2014.¹

I. Discussion

Last year, the Commission undertook additional steps to shepherd the communications industry through the transition from the legacy networks of the 20th Century to the all-IP networks of the 21st Century when the Commission released its Order authorizing the IP-enabled

¹ *Numbering Policies for Modern Communications; etc., Report*, WC Docket Nos. 13-97, 04-36, 07-243, and 10-90; CC Docket Nos. 95-116, 01-92, and 99-200; DA 14-118 (rel. Jan. 31, 2014) (*Report*).

service provider numbering trials (Trials) made the subject of the Bureau’s Report.² Five interconnected VoIP providers (IVPs) applied for and received permission to participate in those Trials, the aim of which was to test “whether giving interconnected VoIP providers direct access to numbers will raise issues relating to number exhaust, number porting, VoIP interconnection, or intercarrier compensation, and if so, how those issues may be efficiently addressed.”³

Although a six-month trial involving five IVPs could hardly explore the question of telephone number exhaust, it is fair to say that all the remaining issues were in fact raised during the trial. But none of those issues, in our estimation, presents insurmountable problems with extending direct access to numbering resources to IVPs. Nevertheless, we felt it was important to add our voice to the dialogue on the Trials in order to assist the Commission in this endeavor.

For reasons best known to the Trial Participants, they chose among other places to conduct their trials in eight AT&T ILEC in-region cities:

- Atlanta, GA;
- Boca Raton, FL;
- Celebration, FL;
- Charlotte, NC;
- Dallas, TX;
- Keys, FL;
- Los Angeles, CA; and,
- Savannah, GA.

Over the course of the Trials, AT&T was successful in negotiating agreements (OSS/LNP Agreements) with Vonage, Millicorp, and SmartEdgeNet to issue local number porting (LNP) requests directly through our Operational Support System (OSS) or indirectly through a service

² See *Numbering Policies for Modern Communications; etc., Notice of Proposed Rulemaking, Order and Notice of Inquiry*, WC Docket Nos. 13-97, 04-36, 07-243, and 10-90; CC Docket Nos. 95-116, 01-92, and 99-200; FCC 13-51 (rel. April 18, 2013) (*Trial Order or IP Numbering NPRM*).

³ *Id.*, para. 2. The Trial participants were: Vonage Holdings Corp. (Vonage), SmartEdgeNet, LLC (SmartEdgeNet), WilTel Communications, LLC (here, Level 3 ES), IntelPeer, Inc. (IntelPeer), and Millicorp—collectively “Trial Participants.” AT&T dealt with all five of the Trial Participants.

bureau. Unfortunately, however, both SmartEdgeNet and Millicorp never completed the documentation necessary to establish passwords and log-in names to allow them to issue direct port requests. Level 3 ES chose to continue its practice of porting indirectly through its carrier numbering partner, Level 3. IntelPeer did not complete negotiations for an OSS/LNP Agreement before the conclusion of the Trial period. This means only Vonage took full advantage of the OSS/LNP Agreement. Nevertheless, we were successful in opening number codes in our networks to enable Vonage, Level 3 ES, SmartEdgeNet, and Millicorp to exchange traffic with us.⁴

From the start, our aim was to make the Trials as successful as reasonably possible. Both the Trial Participants and AT&T were constrained by the short duration of the Trials and the fact that Trial Participants and AT&T had to work within the constraints of existing ILEC systems and processes. For example, in order to operate in the AT&T ILEC regions, AT&T had to effectively “trick” its internal systems into treating the Trial Participants as competitive local exchange carriers (CLECs) in order to allow the AT&T ILECs to accept and process porting requests. Consequently, because they were not in fact CLECs, AT&T had to guard against providing Trial Participants features and services to which they would not be entitled as non-carrier entities. All of this required considerable back-room manual oversight, intervention, and effort. In short, while the Trials achieved some measure of success in allowing for interconnection, porting, and inter-carrier compensation, these successes were not effortlessly obtained on AT&T’s part.⁵

While AT&T is reasonably sure that the Commission does not intend to simply open the floodgates and to grant quick, universal direct access to numbering resources to IVPs, we wanted the Commission to understand that, given the carrier-centric nature of AT&T’s systems and

⁴ IntelPeer opened codes in Los Angeles, CA. During the Trial, AT&T and IntelPeer did not exchange traffic; however, post-Trial, AT&T and IntelPeer have been exchanging traffic.

⁵ Said another way, today AT&T’s systems are geared to and facilitate interaction with carriers—*i.e.*, CLECs, IXCs, and wireless carriers. Non-certificated IVPs do not yet have a place within these systems. AT&T expended significant manual effort to overcome the existing limitations of its systems in order to handle the interconnection, routing, porting, and compensation issues raised by the Trials.

methods and procedures, any permanent and long-standing change in the present numbering access mechanism would require significant time and investment to conform to the new directives from the FCC and the numbering administrators and to handle the challenges posed by non-carrier participants in numbering-related processes (*e.g.*, routing, porting). In brief, AT&T cannot simply flip a switch and accommodate all IVP comers and achieve the same level of positive results (or better) enjoyed during the Trials.

So, while the Trials proved to some degree that certain IVPs were able to handle direct access to numbering resources, much work remains to be done. In the *IP Numbering NPRM* docket, AT&T's comments addressed many of the issues posed by allowing IP-enabled service providers direct access to numbering resources (*e.g.*, documentation/certification, NRUF reporting, facilities readiness, interconnection, enforcement).⁶ With the input from AT&T and other interested parties, the Commission will need to undertake the task of setting out the policy and structure for including non-carrier IP-enabled service providers with direct access to numbering resources. Equally, however, we believe the Commission should charge the North American Numbering Council (NANC) with the intra-industry collaborative task of agreeing upon the mechanisms and processes necessary to give the *non-carrier* IVPs the equivalent provider-to-provider experience enjoyed by carriers today with respect to these numbering-related matters. Naturally, the Commission should establish a reasonable deadline for any NANC's report on this matter. Once these mechanisms and processes are agreed upon and adopted by the Commission, the Commission will need to give carriers sufficient time to implement them.

II. Conclusion

AT&T respectfully requests that the Bureau consider these comments in its deliberations on this matter.

⁶ See Comments of AT&T, WC Docket Nos. 13-97, 04-36, 07-243, and 10-90; CC Docket Nos. 95-116, 01-92, and 99-200 (July 19, 2013); and, Reply Comments of AT&T (Aug. 19, 2013). AT&T hereby incorporates those comments herein by reference.

AT&T

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