



Competitive Carriers Association
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March 21, 2014

Via ECFS

Ms. Julie Veach
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 95-116; WC Docket No. 07-149; WC Docket No. 09-109

Dear Ms. Veach:

Competitive Carriers Association (“CCA”) writes to express concern over the local number portability administrator (“LNPA”) selection process. Competition in the telecommunications marketplace depends on consumer confidence in the ability to seamlessly move between carriers – and among wireline, wireless, and VoIP carriers – without changing telephone numbers. Absent that assurance, consumers will hesitate to switch carriers, even when an alternative carrier offers lower prices and better service. Furthermore, consumers must be certain that portability will work reliably, with no disruptions or delays, no matter which new provider they choose. Competitive carriers, therefore, rely on the LNPA to provide fast, accurate, and neutral service.

Despite these important interests, the LNPA selection process does not appear to have taken into account the interests of non-nationwide wireless carriers in matters such as vendor transition costs, support for Internet Protocol-based numbering systems, and several of the features and functions on which the business models of competitive wireless carriers depend. For example, the LNPA Request for Proposal (“RFP”) does not detail the specific requirements, schedule, approach, costs, or parameters of a transition between LNPAs. In particular, it does not appear that any analysis has been performed to determine the impact of an LNPA transition of smaller carriers, either in terms of financial effects, or in terms of customer disruption. Similarly, the RFP does not fully account for new and evolving services, including IP transition functionalities, which would free number porting from geographic constraints, and dynamic ecosystem monitoring, which enhances system-wide reliability. These services are not addressed by the RFP or are addressed only cursorily,¹ and may not be supported without hundreds of millions of dollars more in potential fees.

Taken together, the omissions from the RFP threaten the reliability and functionality of telecommunications services in the United States. Given the non-dominant carriers’ lower gross

¹ See, e.g., 2015 LNPA RFP at § 7.2.5 (requiring only that the LNPA “work expeditiously with the industry to implement” any change required by the IP Transition).

revenues and use of porting as a customer-acquisition tool, moreover, smaller wireless carriers stand to bear a disproportionate burden from an increase in LNP costs and from failed, delayed, or errant number-porting events.

The insular LNPA selection process has exacerbated these concerns.² For instance, selection criteria and technical requirements were established by the North American Portability Management LLC (“NAPM”), which consists of a non-representative subset of large service providers. Other stakeholders have raised similar concerns.³

To remedy these defects, CCA recommends the Federal Communications Commission (“FCC” or “Commission”) and the North American Numbering Council take into account the interests of smaller wireless carriers in administering the LNPA RFP and, if necessary, amend, modify, or reissue the RFP to consider the effects of the transition and administrative costs that competitive carriers will face; to define the services and service metrics necessary to effect the IP Transition and dynamic ecosystem monitoring; and to specify performance metrics and the costs effects of mass porting and support for public safety services.

Indeed, at a time when the Commission is in the midst of deciding how best to facilitate and accelerate the IP transition, it is essential that the numbering platform that exists today continue to enable that transition without disruption. A more deliberative, detailed, and transparent LNP selection process will help ensure that the current LNP platform supports the IP transition and comports with the rules and policies the Commission ultimately adopts to govern IP-based services.

This notice is being filed pursuant to Section 1.1206(b) of the Commission’s rules. Should you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson
General Counsel

² See, e.g., Letter from Pamela H. Hollick, President of Midwest Association of Competitive Carriers, Inc., to Julie Veach, Chief of the FCC’s Wireline Competition Bureau, CC Dkt. No. 95-116, WC Dkt. No. 09-109, at 1 (filed Mar. 4, 2014); Letter from John Liskey, Executive Director of the Michigan Internet & Telecommunications Alliance, to Julie Veach, Chief of the FCC’s Wireline Competition Bureau, CC Dkt. No. 95-116, WC Dkt. No. 09-109, at 2 (filed Feb. 17, 2014).

³ See, e.g., Letter from Pamela H. Hollick, President of Midwest Association of Competitive Carriers, Inc., to Julie Veach, Chief of the FCC’s Wireline Competition Bureau, CC Dkt. No. 95-116, WC Dkt. No. 09-109 (filed Mar. 4, 2014); Letter from Scott Kell, Executive Vice President, Operations and Engineering of Peerless Network, Inc., to Marlene Dortch, FCC Secretary, CC Dkt. No. 95-116, WC Dkt. No. 09-109 (filed Feb. 21, 2014); Letter from John Liskey, Executive Director of the Michigan Internet & Telecommunications Alliance, to Julie Veach, Chief of the FCC’s Wireline Competition Bureau, CC Dkt. No. 95-116, WC Dkt. No. 09-109 (filed Feb. 17, 2014); Letter from Angie Kronenberg, Chief Advocate and General Counsel to COMPTTEL, to Marlene Dortch, FCC Secretary, CC Dkt. No. 95-116, WC Dkt. Nos. 07-149, 09-109 (filed Feb. 7, 2014).