

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Technology Transitions)	GN Docket No. 13-5
)	
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition)	GN Docket No. 12-353
)	
Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	

COMMENTS OF CENTURYLINK

As announced in the *Technology Transitions Order*, the Commission is looking to develop “a telephony numbering testbed for collaborative, multi-stakeholder research and exploration of technical options and opportunities for telephone numbering in an all-IP network.”¹ Developing ideas in a testbed avoids disrupting current systems and the provision of service to customers, yet it allows interested parties to work through technical feasibility constraints to allow for consideration of the broadest range of policy options and outcomes. The ultimate “goal of the Numbering Testbed is to convene a community and provide common resources to enable research into numbering in an all-IP network, unencumbered by the constraints of the legacy network and technologies and ensuring that there is no disruption to

¹ *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Connect America Fund; Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Numbering Policies for Modern Communications*; GN Docket Nos. 13-5 and 12-353, WC Docket No. 10-90, CG Docket Nos. 10-51 and 03-123, WC Docket No. 13-97, Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5, ¶ 152 (rel. Jan. 31, 2014) (*Technology Transitions Order*).

them.”²

In this spirit of innovation and community, parties were invited to submit specific proposals.³ Three commentors did so: InCharge Systems, JSI, and Phoneword.⁴ Below, CenturyLink comments briefly on the proposals.

InCharge Systems’ concept proposes using telephone number-related digital certificates and incorporating them into the IP-numbering process. CenturyLink sees value in experimenting with many options around the digital-certificate concept within the context of telephone numbers. Yet at this early stage, with limited information and even less operational detail, we cannot determine what approach might best accomplish the Commission’s ultimate goals in the IP-numbering environment.⁵ Still we are willing, even eager, to incorporate the digital-certificate concept into the National Numbering Testbed workshop(s) rather than experiment with the notion in subsequent, potentially redundant and competing, independent work efforts. We look forward to working with a host of industry participants within the testbed community to define and test various digital certificate ideas in a manner that will not compromise or undermine the integrity and utility of numbering information and processes.

The JSI “Hundreds Block Pooling” proposal suffers from its modeling on the PSTN’s

² Public Notice, FCC Chief Technologist to Host Numbering Testbed Workshop, WC Docket No. 13-97, DA 14-290 (Feb. 28, 2014) at 1 (footnote omitted).

³ *Technology Transitions Order* at ¶ 5.

⁴ Letter from Michael D. Hamilton, InCharge Systems, Inc. to Marlene H. Dortch, FCC (Feb. 20, 2014); Letter from John Kuykendall, John Staurulakis, Inc. to Marlene H. Dortch, FCC (Feb. 20, 2014); Letter from Jay Carpenter, WARNING Communications, Inc. d.b.a. PHONWORD to the United States FCC (Feb. 13, 2014).

⁵ To “create credentials for end users and carriers that allow them to assert that they have been issued such a number; rapidly port with validation, including new mechanisms similar to domain names that provide users with secure porting keys for their numbers to greatly reduce erroneous and malicious ports (and the related slamming); associate validated number user information to prevent spoofing” (footnote omitted). *Technology Transitions Order* at ¶ 162.

current number assignment and management processes with respect to thousands-block pooling. The Commission's, and the industry's, expectations are that the National Numbering Testbed look at future numbering processes and systems for the time when the industry is in an *all-IP* world. CenturyLink appreciates JSI's vetting this concept in industry fora for discussion, and acknowledges that the proposal might accomplish a transition mechanism for traditional carrier providers utilizing the current numbering protocol. But we remain skeptical that the full range of service providers that might operate in an IP environment would support testing the proposal. As a result, we do not believe JSI's proposal is an appropriate one to test in the IP-numbering testbed.

The premise of the Phoneword proposal is the monetization of phone numbers, which -- in CenturyLink's view -- is fundamentally a regulatory and numbering policy issue and not something aligned with the technology focus of a national numbering testbed. Indeed, Phoneword proposes "experimenting with various *policies*, governance, [and] business models...."⁶ Such a proposal is premature based on the need to determine number-addressing *technology* in an all IP environment before determining a compensation methodology.

The concept presented by Phoneword is actually a compensation proposal and not a technology proposal, putting it at odds with the Commission's stated objective of the testbed concept which is to assess the technical feasibility objective for the national numbering testbed. The Commission needs to reject proposals such as that advocated by Phoneword because pursuing them would unnecessarily distract from objectives of the national numbering testbed and consume valuable, but limited, industry resources. A better approach for vetting the ideas promoted by Phoneword would be for Phoneword to propose a separate experiment unassociated

⁶ Phoneword at first page of cover letter (emphasis added).

with the national numbering testbed.

CenturyLink looks forward to participating in the national numbering testbed workshop to be held on March 25, 2014 to begin the investigative and experimental processes that are certain to arise.

Respectfully submitted,

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