Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matters of	)
	)
Local Number Portability Porting Interval	) **WC Docket No. 07-244**
And Validation Requirements	)

COMMENTS OF
THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS

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Summary

The Alliance for Telecommunications Industry Solutions (ATIS) urges the Commission to adopt the proposal developed by the industry through the ATIS Ordering and Billing Forum (OBF) and recommended by the North American Numbering Council's (NANC) Local Number Portability Administration Working Group (LNPA WG) regarding the fields that are necessary to complete simple wireline-to-wireline and intermodal ports. This proposal identifies fourteen (14) fields that are necessary to accomplish a port by those service providers that offer more than a single telecommunications product to other service providers and/or to satisfy the reduced porting interval of one day established by the Commission.

ATIS recommends that the Commission give due consideration to the similarities between the ATIS OBF/LNPA WG proposal and the alternative proposed by the cable industry. For example, both proposals acknowledge that more than four (4) fields are necessary to accomplish a port and identify a common subset of eight (8) fields. Moreover, both proposals are based on the fields as defined in the ATIS Local Service Request forms and process. ATIS notes that it is <u>essential</u> for the Commission to standardize the local service request forms and porting processes that providers use.

Finally, ATIS urges the Commission to act expeditiously and mandate use of the industry-developed porting fields, processes and forms, effective with the date it has established for the implementation of the one day porting interval in order to mitigate fallout, errors and related subscriber impacts. Quick action is necessary to ensure that the industry can successfully provide end users with a seamless ability to port numbers without procedural delays or errors.

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COMMENTS

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission's (Commission) *Public Notice,* released December 8, 2009. In the *Public Notice*, the Commission seeks input regarding what fields are necessary to complete simple wireline-to-wireline and intermodal ports within the one business day rule. As described more fully below, ATIS supports the proposal developed by the industry through the ATIS Ordering and Billing Forum (OBF) and recommended by the North American Numbering Council's (NANC) Local Number Portability Administration Working Group (LNPA WG) and urges the Commission to adopt this proposal. ATIS further urges the Commission to act expeditiously and mandate use of the industry-developed porting fields, processes and forms, with the date it has established for the implementation of the one day porting interval in order to mitigate fallout, errors and related subscriber impacts.

I.   <u>Background</u>

ATIS is a global standards development and technical planning organization committed to providing leadership for, and the rapid development and promotion of worldwide technical and operations standards for information, entertainment and communications technologies using a pragmatic, flexible and open approach. Nearly 600 industry subject matter experts from more than 250 information and communications technology (ICT) companies work collaboratively in ATIS'18 open industry committees, which focus on a broad range of priorities for the ICT industry, including network architectures and platforms, the ordering and billing of services, E-911, cyber security, the reliability and interoperability of current and next generation technologies, the seamless delivery of converged wireline and wireless services over multimedia platforms, and the networks of the future.

The ATIS OBF is one of ATIS' most important committees. The OBF is an open telecommunications industry forum that identifies and resolves national issues affecting the ordering, billing, provisioning and exchange of information about access services, connectivity and related matters. The OBF encourages participation from all segments of the communications industry and includes as members a variety of wireless and wireline service providers, including CLECs, ILECs and cable companies.[1] All members of the

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[1] OBF members for 2009 included: ACM, Inc., Advanced Technologies Services, ATL, AT&T, Bell Canada, CenturyLink, Chillicothe Telephone Company, CommSoft, Communications Data Group, Cox Communications, Creative Support Solutions, csf Corporation, DSET Corporation, Fairpoint Communications Inc., Hawaiian Telcom Inc., Horry Telephone Cooperative, Inc., Idearc Media, Innovative Systems, Intec Telecom Systems, Integra Telecom, Iowa Network Services, Inc., Martin Group, Inc., National Information Solutions Cooperative, NECA, NeuStar, Inc., One Communications, Pierce, Neumeister & Associates, Qwest, Sprint, Syniverse Technologies, Inc., T-Mobile, Telcordia Technologies, Telephone and Data Systems (TDS Telecom), TeleSphere Software, TEOCO Corporation, Transaction Network Solutions, UDP, Verizon, 1-800 American Free Trade Association, and 800 Response Information Services LLC.

OBF may participate in any work performed by the forum or its subtending committees, including those that work on number portability issues such as the Local Service Ordering and Provisioning (LSOP) and Wireless Committees and the Intermodal Subcommittee.

The ATIS OBF is the developer of the industry guidelines pertaining to wireline-to-wireline, wireless-to-wireless and intermodal porting. The industry guidelines are developed using ATIS' open, equitable and consensus-based processes and are constantly updated to address new issues and to reflect the changing nature of the communications industry:

- ATIS Local Service Migration Guidelines (LSMG). One of the national guidelines developed by the OBF is the Local Service Migration Guidelines (LSMG), which establish general business rules and procedures governing the migration of end users between local service providers (LSPs) to ensure that end users can transfer their local service from one LSP to another. The document focuses on wireline voice service migrations and data service migrations (including voice/data combinations) as well as on intermodal voice service migrations. The guidelines note that service migration should occur in a seamless and timely fashion. The LSOP Committee periodically updates these guidelines, which are publicly available for free, to address additional migration scenarios.

- ATIS Local Service Ordering Guidelines (LSOG). The Local Service Ordering Guidelines (LSOG) contain ordering forms and descriptions of valid data entries that are required for the ordering, billing, and provisioning of local telecommunications service. Included within the LSOG are the forms used to port a telecommunications subscriber from one service provider to another. For instance, the Local Number Portability (LNP) form identifies the type of information that is necessary for the porting of a telephone number by a service provider. Each LNP form requires the accompaniment of two additional forms, the Local Service Request (LSR) form and the End User (EU) form. Administrative, billing and contact details are contained within the LSR form. Location and access information required for ordering local service is contained within the EU form.

- ATIS Wireless Intercarrier Communications Interface Specification (WICIS). The ATIS OBF has also developed guidelines to assist in wireless-to-wireless porting. The WICIS for Local Number Portability provides guidelines for wireless-to-wireless migrations.

II. The OBF/LNPA WG Industry Consensus Was Developed by Industry Subject Matter Experts from a Broad Cross-Section of the Industry

In the *Public Notice*, the Commission seeks input regarding the fields necessary to complete simple wireline-to-wireline and intermodal ports and notes that two proposals have been received regarding this matter. The first proposal is the industry consensus that was developed by and unanimously agreed to in the ATIS OBF, recommended by the NANC LNPA WG for approval by the NANC and, as acknowledged by the NANC Chair, had the "strong support" of most NANC members.[2] The other is the proposal received from the National Cable Television Association, Cox Communications and Comcast Corporation. As explained more fully below, ATIS continues to strongly support the industry proposal its members have developed.

ATIS notes that the OBF/LNPA WG industry proposal was the result of significant work by many companies representing a variety of different segments of the communications industry. As the Commission is aware, the effort to streamline the process has not been easy. It has been a difficult task complicated by both the inherent complexity of the porting process and the divergent business processes used by service providers. Yet, despite the challenges, the OBF members, representing local exchange carriers, competitive LECs, and wireless service providers,[3] worked diligently to reach consensus on a way to reduce the number of fields required for porting.

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[2] Chairman Kane's November 2, 2009, letter to Sharon Gillet, Chief of the Wireline Competition Bureau, noted that "Most NANC members communicated strong support for the revised Section 3.5.1 recommendation."

[3] The ATIS OBF is open to all service providers, as well as communications equipment providers, software companies, and others that support ordering and billing functions. ATIS notes that at the time the July and October OBF consensus recommendations were being developed, Cox was also a member of the OBF, although it chose not to actively participate in the development of the industry consensus.

The OBF's work began prior to the release of the *Report and Order and Notice of Proposed Rulemaking*[4] that reduced the porting interval for simple ports to one day and was accelerated to provide input to the Commission and the NANC.[5] On July 16, the ATIS OBF proposed a single set of twenty-one (21) fields representing a fraction of the fields identified in the LSOG for both simple and non-simple ports. The OBF proposed these specific fields based on a balancing of important interests: the need to streamline the porting process for both simple and non-simple ports, particularly given the difficulties that service providers may encounter in identifying simple ports and in distinguishing them from complex ports;[6] recognition that sufficient information must be available to accomplish a port within the reduced porting interval established by the Commission and given the business processes used by service providers; and the desire to minimize errors in the porting process.

During the July 2009 NANC meeting, concerns were expressed regarding the fields identified by the industry through the ATIS OBF. Many of these concerns stemmed from the proactive approach taken by the OBF in reducing the number of required fields for both simple and non-simple ports. It was noted that the task before the NANC and the industry was to identify the fields required only for simple ports. While the industry continues to support the more comprehensive approach, it chose to respond

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[4] *Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No.07-244 (rel. May 13, 2009) (hereinafter *One Day Porting Order*).

[5] On May 21, 2009, the NANC Local Number Portability Administrator Working Group (LNPA WG) contacted ATIS OBF to request input on a standard list of data fields to be used for simple and non-simple ports.

[6] ATIS has previously noted the difficulties that may be faced in identifying simple ports and in distinguishing them from complex ports. The Commission's definition of simple ports includes characteristics that may only be known to the porting-out service provider. For instance, wireless service providers, cable providers or any other winning provider porting-in a number from a wireline service provider may not be able to identify whether a port involves complex services, such as, Centrex, Hunt Groups or DSL.

to the concerns expressed by modifying its previous proposal. Through expedited

meetings, the ATIS OBF was able to reach unanimity on a new proposal focusing only on

simple ports. Participating in this consensus were representatives of the following

companies:

AT&T	Qwest
Bell Canada	Sprint
Cellular One	Syniverse
Creative Support Solutions	Telcordia
DSET	Teoco
Embarq/CenturyLink	T-Mobile
FairPoint	Transaction Network Services
Idearc Media	US Cellular
NeuStar	Verizon
One Communications	

The modified industry proposal identified fourteen (14) fields below for simple

porting. These fields have been identified because they achieve the following objectives:

(1) they are necessary to accomplish a port by those service providers that offer more

than a single telecommunications product to other service providers; (2) they are

necessary to satisfy the reduced porting interval of one day established by the

Commission; or (3) they are necessary to reduce porting errors that would frustrate both

(1) and (2) above. ATIS OBF members believe that no further reduction in the number

of fields is possible without posing significant risk of procedural errors and substantial

delay to the porting process. The goal, after all, is not simply to pick the lowest number

of fields as some absolute good. Rather, the three criteria outlined above are the

appropriate criteria for achieving the objective of determining the minimum number of

fields to accomplish simple ports without impairment to subscribers' services.

It is important to note that some fields in the OBF/LNPA WG proposal are required by those communication companies that provide multiple service offerings to other service providers but may not be required by companies that have limited service offerings. For instance, for those service providers who do not offer products to service providers other than number portability (such as cable companies), the REQTYP and ACT fields may not be necessary; however, these fields are necessary for providers that offer multiple products. By eliminating these fields, the cable industry's proposal represents a narrow view of number portability based on differences between that segment's business operations and the operations of other segments.

The Commission should not establish rules that would unfairly discriminate against the larger communications industry simply to reduce the existing number of fields for the benefit of a specific segment. Instead, the Commission should focus on the impact that changes to the porting rules could have on end users, who are the intended beneficiaries of the number porting rules. The companies that participated in and continue to support the industry consensus proposal deliver services to the vast majority of end-users and it is important that the continued delivery of these services not be jeopardized by changes made to the porting process that do not take into account the needs of the broader industry.

III. The Commission Should Consider the Common Elements of Both Proposals

While each of the proposals identifies a different number of fields for simple porting, they have important similarities. Both proposals: (1) acknowledge that more than four (4) fields are necessary to accomplish a port; (2) acknowledge a common subset

of eight (8) fields; and (3) are based on fields as defined in the ATIS Local Service

Request forms and process. These similarities should be given due consideration by the

Commission.

First, both proposals acknowledge that more than four (4) fields are necessary to

accomplish a port. In fact, there has been unanimous agreement by both ATIS OBF

members and NANC members that more than four fields are necessary to comply with

the shortened porting interval.[7] All segments of the industry agree on this point and

ATIS believes that the Commission should explicitly clarify its November 8, 2007,

Declaratory Ruling on this matter.[8] ATIS therefore urges the Commission to grant the

Petition for Clarification and for Limited Waiver for Extension of Time filed by One

Communications Corp. on February 5, 2008, regarding the minimum fields for

accomplishing a port.

Second, both proposals acknowledge that the following eight (8) fields are

required to accomplish a port:

- o PON (Purchase Order Number)
- o AN (Account Number)
- o DDD (Desired Due Date)
- o CC (Company Code)
- o NNSP (New Network Service Provider Identification)
- o ZIP (5-digit ZIP Code)
- o PORTED NBR (Ported Telephone Number)
- o VER (Version of the Port Request)

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[7] *See* Chairman Kane's November 2, 2009, Letter to Sharon Gillet, Chief of the Wireline Competition
Bureau.
[8] *Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking*, WC
Docket No. 07-243, WC Docket No. 07-244, WC Docket No. 04-36, CC Docket No. 95-116; CC Docket
No. 99-200 (rel. November 8, 2007).

While these eight fields represent a portion of the minimum subset of fields, the industry strongly believes that six (6) additional fields are required to accomplish a port within the shortened porting interval for those service providers that offer multiple products.

Third, both proposals are based on fields as defined in the ATIS Local Service Request forms and process,[9] which provide the framework for the ordering and provisioning of telephone service, including local number portability. It is <u>essential</u> for the Commission to act now to standardize the local service request forms and porting processes that providers use. The Commission should mandate industry-wide use of the ATIS-developed porting fields, forms and processes, effective no later than the date it has established for the implementation of the one day porting interval.[10]

Without standardization of the fields, forms and processes to be used for simple porting, service providers could be forced to develop completely different ordering system(s)/process(es) to address these ports, and would not be able to take advantage of pre-existing systems. New systems would need to be created and/or existing systems would need to be modified. Until these systems become operational, service providers may be obligated to handle simple ports manually, making consistent one-day porting all but impossible. The development and use of new or modified ordering systems to separate the simple port process from other products/processes is likely to result in significant fallout not only for simple ports, but also for other products and services (including non-simple ports) impacted by the system changes. The creation of different ordering systems also would require a significant amount of time to both develop and

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[9] ATIS notes that the LSR porting forms may be transmitted either manually or electronically.
[10] As ATIS has previously noted, it will make available the relevant porting forms to industry at no charge.

implement, needlessly imposing significant burdens on the industry in terms of costs and other resources.

IV. Fourteen Fields are Required to Accomplish a Port

ATIS OBF and its members urge the Commission to adopt the OBF/LNPA WG industry proposal and establish that the following fourteen (14) fields may be required to accomplish simple wireline-to-wireline and intermodal ports. As described in greater detail below, each of these fields is required to accomplish a port, to satisfy one-day porting or to reduce porting errors.

1. **CCNA - Customer Carrier Name Abbreviation.** The CCNA field identifies the service provider placing the order and is one of the critical fields necessary to initiate automation/electronic ordering and/or selection of the correct user profile. Due to mergers and acquisitions, service providers may have multiple CCNAs that may be used internally to identify the product being ordered, the state, etc. The CCNA is not the same as the CC (Company Code), which, in combination with the CCNA, drives flow through requirements as well as other performance metrics required by the individual states. Because there is not a one-to-one relationship between the CCNA and CC, the CCNA must be specified on the request in order to associate the correct CCNA to the appropriate CC.

    The Need for CCNA: Elimination of the CCNA field from the ordering process would increase the occurrences of porting errors and associated delays. Without this field, the Local Service Request (LSR) may be misdirected, causing delays in the number portability process. This field is also necessary to comply with state regulatory requirements pertaining to performance metrics. In addition, the Old Service Provider could be forced to develop a completely different ordering system/process to address simple ports and would not be able to take advantage of pre-existing systems, which would require a large investment in dollars and many months of development. Service providers could be obligated to handle simple ports completely manually, which would make consistent one-day porting all but impossible to accomplish. For those companies who have one CCNA or use only one for local number portability, the decision could be made to automatically populate the data in this field for ease of ordering.

2. **PON – Purchase Order Number.** The PON field, one of the eight fields that the OBF/LNPA WG industry consensus and cable industry proposals have in common, identifies the submitting service provider's unique purchase order or requisition number that authorizes the processing of this request or supplement. In

combination with the VER field, this field is required for service providers to track the ongoing progress of the request. The PON field is the fingerprint of an order. It is the unique identifier for any service request (LSR) and is critical to the automation process for number portability as it prevents ordering and processing duplication errors associated with the order.

The Need for PON: This field is necessary to accomplish a port. Without the PON field, the ability for both the Old and New Service Providers to deliver order status to the end user, to track the order internally, and/or to make changes/modifications to the original request would be completely compromised.

3. **AN – Account Number.** The AN field, one of the eight fields that the OBF/LNPA WG industry consensus and cable industry proposals have in common, was also identified by Commission in its *Four Fields Decision* as one of the fields that may be required for validating a port request. This field identifies an account number assigned by the current Network Service Provider and the billing number in the current service provider's database, which may not be the same as the ported number. It is also required for the current service provider to properly discontinue end user billing.

The Need for AN: This field is necessary to reduce the number of porting errors and has already been established by the Commission as a field that may be required as part of the porting process. Without the AN field, the industry would expect to experience an increase in inadvertent ports based on the reduction in validation fields.

4. **DDD – Desired Due Date.** The DDD field is one of the eight fields that the OBF/LNPA WG industry consensus and cable proposals have in common. This field identifies the desired due date for the order and is required to differentiate between simple and non-simple ports. It allows for the coordination of the porting process, eliminating potential end user out of service conditions. The DDD determines the appropriate process intervals, such as "FOC," "reject," "NPAC timers," etc. Many providers utilize the DDD to determine end user effective billing date(s).

The Need for DDD: The DDD field is necessary to accomplish a port. Without the DDD field, there is no way to differentiate between simple and non-simple ports, to determine the appropriate process intervals, NPAC timers, or effective billing date(s), or to meet the customer's requested due date. The Old Service Provider would be forced to make assumptions about the timing interval and these assumptions may or may not meet the end user's needs.

5. **REQTYP - Requisition Type.** The REQTYP identifies the type of order being processed. The majority of service providers submit many different types of orders for processing, using the ATIS Local Service Request (LSR) form, based on the products identified below:

> Loop
> Loop with number portability

Number portability
Retail/Bundled
Resale
Unbundled local switching (Port)
Directory listings
Directory listings and assistance
Resale private line
Resale frame relay
Combined loop and unbundled local switching (Port)
D/DOD/PBX
CENTREX resale
ISDN
Asynchronous transfer mode (ATM)

Trading partners, both Old and New Service Providers, offer a variety of services to their customers (i.e., end users, CLECs, wireless providers and other service providers). In order for those ordering processes to continue, with or without number portability, the Old Service Provider must be able to determine the type of order being received.

The Need for the REQTYP: Without the REQTYP field, there is no way for the Old Service Provider that offers multiple products to determine whether the order received is for local number portability or any other product.

6. **ACT – Activity Type**. The ACT field identifies the activity involved in the Local Service Request (LSR). In concert with the REQTYP, which identifies the product being ordered, this field identifies the precise action to be undertaken on behalf of the New Service Provider. Those actions include:

New installation and/or account
Change an existing account, e.g., rearrangement, partial disconnect or addition
Disconnection
Inside move of the physical termination within a building
Outside move of end user location
Record activity is for ordering administrative changes
Conversion or migration of the service as specified
Migration as is
Suspend
Restore
Seasonal suspension
Deny
Short term suspension

The Need for ACT: This field is necessary to accomplish a port within the one-day porting interval. Without ACT (and REQTYP), the majority of Old Service Providers would not be able to determine the type of order being submitted. Additionally, without this field, the existing use of LSR process automation could

not be utilized and all simple ports would have to be processed manually, making compliance with the Commission's one day porting rule all but impossible.

7. **CC – Company Code.** CC is one of the eight fields that the OBF/LNPA WG industry consensus and cable industry proposals have in common. The field identifies the exchange carrier initiating the transaction and, in combination with other carrier credential information (i.e. CCNA, NNSP), initiates automation and efficient processing of the order. This field also identifies the specific product being ordered (UNE, Resale), directs the order to the appropriate internal processing group(s) and assists with appropriate billing.

    Service providers also utilize the CC field to collect data for the measuring and reporting performance to state public service commissions. These measurements are in place to ensure that the CLECs receive the same level of service as the ILECs provide for themselves. Examples of performance metrics reported are order flow through, Form Order Confirmation (FOC) interval, orders delivered on time, etc.

    The Need for CC: Without the CC field, orders could be incorrectly routed and the end user could experience delays in the porting request. This is particularly true for those providers, including wireless service providers and smaller providers, who utilize clearinghouses or aggregators.

8. **NNSP – New Network Service Provider.** The NNSP is one of the eight fields that the OBF/LNPA WG industry consensus and cable proposals have in common. This field identifies the Number Portability Administration Center (NPAC) Service Provider Identifier (SPID) of the new Network Service Provider (NSP).[11] The field is critical to the creation of, or concurrence with, the subscription version transaction and associated timers in NPAC by the Old Network Service Provider.

    The Need for NNSP: Without the NNSP field, the NPAC and porting processes would be fundamentally broken. The NPAC porting process could not be initiated and the end user would be unable to port their telephone number. The NNSP/SPID is the key driver for the NPAC porting process.

9. **AGAUTH – Agency Authorization Status.** The AGAUTH field is essentially a check box indicating the New Service Provider has a Letter of Agency (LOA) from the end user. It was originally added along with a series of other fields (AUTHNM (Authorization Name) and DATED (Date of Agency Authorization) in support of the Commission's anti-slamming rules.[12] While the industry agreed to remove the other related fields, it strongly believes that the porting process must include positive indication of possession of an LOA. It is important to note that the industry is neither asking to see a copy of the LOA nor requesting specific data from the LOA.

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[11] The Number Portability Administration Center (NPAC) is operated by Neustar, and serves as the central mediation center for all LNP activity.

[12] *See* 47 CFR §64.1120.

The Need for AGAUTH: Without this field, end users would experience more inadvertent ports. Some industry members have noted an increase in the number of end-users ported in error since the Commission adopted its *Four Fields Decision*. By providing a positive indication that the New Service Provider has an LOA, instances of porting in error will decrease. Moreover, this field also mitigates against possible legal/regulatory/processing risks by releasing the Old Service Provider from liability for port out in error claims.

10.   **NPDI – Number Portability Direction Indicator.** The population of this field is required in order to determine E911 requirements as specified in the National Emergency Number Association (NENA)'s Number Portability Direction Indicator Standard. This standard requires the population of the NPDI field when service is ported to another service provider.[13] The NPDI determines the direction of the port and drives E911 behavior on the part of the Old Service Provider.[14] For example, in a wireline-to-wireless migration, the E911 is unlocked and deleted by the Old Service Provider. In a wireline-to-wireline migration, the transition of 911 services is more complicated. Normally, the 911 service is unlocked by the Old Service Provider, and migrated and locked by the New Service Provider. However, when the end user is relocating, the Old Service Provider unlocks and deletes the 911 information. The New Service Provider is then responsible for ensuring the appropriate 911 information for the end user at the new address populated in the database. The E911 record of the end use is unlocked or deleted from the Old Service Provider's database, based on the indicator in the NPDI field.

The Need for NPDI: This field is essential to ensuring that the end-user's effective access to 911 is not disrupted as a result of the porting process. Without this field, key information pertaining to the geographic location of the end user may not be transferred to PSAPs.[15] In addition, because wireless and wireline providers have agreed to utilize the NPDI field to derive other data rather than requiring the population of other fields,[16] eliminating this field would actually increase the number of fields (by requiring the population of ELT, EUMI, ONSP). Moreover, service providers are able to use this field to prioritize and automate processes.[17] Finally, it should be noted that many providers utilize the NPDI field

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[13] *See* National Emergency Number Association Data Standards for Local Exchange Carriers, ALI Service Providers & 9-1-1 Jurisdictions, 02-011v.7, Section 21D.3 (September 17, 2009).

[14] For example, A = Wireless-to-Wireless, B = Wireless-to-Wireline, C = Wireline-to-Wireless and D = Wireline-to-Wireline.

[15] Although the database providers and PSAPs do not see this field, they do see actions and data presented to them (unlock, lock, migrate, disconnect) based on population of the NPDI field on the LSR and the NENA standard.

[16] For example, the Old Network Service Provider (ONSP) field is only required when the NPDI is "B" (Wireless-to-Wireline), otherwise optional. The End User Listing Treatment (ELT) field is prohibited for a REQTYP "C" when the NPDI is not "D" (Wireline-to-Wireline), otherwise optional. The EUMI field is only required when the NPDI is "D" (Wireline-to-Wireline) and the end user is moving at the time of the migration.

[17] An additional complication is that elimination of the NDPI field would require a revision to the industry standard to reflect this change.

to properly route customer calls and port requests to the appropriate groups within their organizations, allowing the prioritization and automation of porting processes.

11. **TEL NO (INIT) – Telephone Number.** The contact telephone number for the initiator of the Local Service Request (LSR) is used to obtain information in response to a question/concern with respect to an order. The need for such clarifications is a common occurrence and usually such clarifications are accomplished via telephone call rather than rejecting the order out of hand. Even when an order is rejected, calls may be made to clarify the reason for said rejection.

   The Need for TEL NO (INIT): This field facilitates prompt resolution of issues, without which, compliance with the one day business porting interval could be jeopardized. Given the size of communications companies and the sheer number of personnel assigned to ordering processes, there is no reasonable way to find contact information regarding the person, group or department who initiated the port without this field. Contacting the general call center number has proven to be ineffective in the timely resolution of questions/concerns. That being said, should a service provider prefer to use a telephone number for one of their centers in lieu of the TN for the rep who initiated the request, that number could be automatically populated in this field to reduce field entry requirements.

12. **ZIP (End User) – Zip Code.** The ZIP CODE field is one of the four fields used for validation as mandated in the FCC's *Four Fields Decision* and is one of the eight fields that the OBF/LNPA WG industry consensus and cable industry proposals have in common. This end user ZIP CODE field is used for the service address. In conjunction with the other three validation fields, this field can be used to ensure that the correct end user's service is being migrated and to minimize inadvertent ports.

   The Need for ZIP: Without this field, an increase in inadvertent ports based on the reduction in validation fields would be expected.

13. **PORTED NBR – Ported Telephone Number.** The PORTED NBR field, one of the eight fields that the OBF/LNPA WG industry consensus and cable industry proposals have in common, identifies the telephone number or consecutive range of telephone numbers residing in the same switch to be ported.

   The Need for PORTED NBR: This field is necessary to accomplish a port. Without the PORTED NBR field, the order could not be processed as it would be impossible to determine the telephone number(s) to be ported.

14. **VER – Version.** The VER field is one of the eight fields that the OBF/LNPA WG industry consensus and cable proposals have in common. It identifies the submitting service provider's order version number. In combination with the PON field, this field is required for service providers to track the ongoing

progress of the request and to ensure the correct version of the order is being processed.

The Need for VER: This field is necessary to effectively accomplish a port. The absence of this field would jeopardize the ability of both Old and New Service Providers to deliver order statuses to end users, to track orders internally, and to make changes or modifications to the original porting request.

It should be noted that some fields may be consistent for a particular service provider's orders and could be populated automatically, mitigating the burden of populating these additional fields (e.g., REQTYP, ACT, CC, CCNA, NNSP, AGAUTH). This is particularly true for those service providers that only order one product or service.

V.   The Commission Should Act Expeditiously to Adopt the OBF/LNPA WG Industry Consensus Proposal

ATIS urges the Commission to expeditiously adopt the OBF/LNPA WG industry consensus proposal as described above. In particular, ATIS notes that it is essential to mandate the use of the porting fields, forms and processes as soon as possible. The FCC should establish an implementation date no later than the date is has established for the implementation of the one day porting interval. Quick action is necessary to ensure that the industry can successfully modify its systems or develop new ones that will provide end users with a seamless ability to port numbers without procedural delays or errors.

The industry already has begun its implementation work involving subject matter experts of all kinds in the common effort to comply with Commission's mandated deadlines.[18] Significant changes to existing systems and the development of new systems is underway by both wireline and wireless service providers. This work, which has taken and will continue to require a significant amount of effort and time, is based on the

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[18] *One Day Porting Order* at ¶11.

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OBF/LNPA WG industry consensus proposal. If the Commission's porting rules do not reflect this proposal, the work will need to be reexamined and significant additional work will also be required.[19]

VI.   <u>Conclusion</u>

ATIS urges the Commission to expeditiously adopt the industry recommendation developed by ATIS and supported by the NANC LNPA in order to mitigate fallout, errors and related subscriber impacts associated with the implementation of one day porting. ATIS further requests that the Commission act expeditiously to mandate the use of the industry-developed porting fields, forms and processes. Such mandate should establish an implementation date no later than the Commission established date for the implementation of the one day porting interval.

Respectfully submitted,

By: _____

Thomas Goode,
General Counsel

Its Attorney

Dated February 16, 2010

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[19] ATIS notes that, depending on when the new rules are adopted and what the rules specify, some service providers may be forced to request waivers based on the necessary system development cycle timeframes.