

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

REPLY COMMENTS

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these reply comments in response to the Federal Communications Commission’s (Commission) *Public Notice*, released December 8, 2009, regarding local number portability. ATIS notes that there is strong support from commenters for the OBF/LNPA WG industry proposal that identifies fourteen fields that may be necessary to accomplish a simple port, particularly from those commenters that offer more than a single telecommunications product to other service providers. ATIS also notes that there is strong support for the Commission to mandate use of the industry-developed forms and processes used for number porting.

I. There is Strong Support for the OBF/LNPA WG Industry Proposal

ATIS notes that the OBF/LNPA WG industry proposal has strong support from organizations and companies representing a broad array of communications companies. AT&T, Sprint-Nextel, T-Mobile USA, Verizon, Verizon Wireless, Qwest Corporation, U.S. Cellular, Comptel and CTIA – The Wireless Association® have all filed comments indicating their support for the OBF/LNPA WG proposal. These companies and

organizations recognize that OBF/LNPA WG industry proposal as the best approach to address the complexities inherent with number portability and to meet the needs of the broader communications industry and particularly those service providers that offer more than a single telecommunications product to other service providers.

The fundamental reality of number portability is that, in order to port a number, the old service provider and the new service provider must exchange enough information to ensure the port can be processed between the two. Due to the complex differences between wireline and wireless processes and porting specifications, the fourteen fields in the OBF/LNPA WG industry proposal are necessary to synchronize and interoperate intermodal ports in a highly efficient, automated manner that enhances the ability of end users to have their ports completed on time and that minimizes long-term costs. By looking only to reduce the number of fields, without full appreciation of the need for such fields by the broader communications industry, the Commission could degrade, rather than enhance, porting (particularly intermodal porting) thereby harming, rather than promoting, competition and the end user experience.

There are many complexities inherent in the porting process, not the least of which are those involved in the intermodal process. For example, when porting from wireline to wireless, each intermodal port request requires two conversion and mapping steps (from wireless to wireline for the request and from wireline to wireless for the response) to facilitate order processing. The fourteen fields recommended by ATIS include the fields needed to accomplish this process.

The joint comments submitted by Sprint Nextel, T-Mobile USA, Verizon, Verizon Wireless, Qwest, CTIA- The Telecommunications Association® and U.S. Cellular (joint

commenters) accurately recognize that “the work performed by ATIS OBF and the LNPA-WG was designed to standardize and minimize the number of fields as appropriate across the entire industry rather than a particular segment thereof.”¹ AT&T notes that the industry, working through the ATIS OBF, did not “simply find a single provider that uses the fewest data fields and eliminate the rest” but rather worked with all providers “to make sure that the data fields they need are included, all the while making sure that there [are] no more fields than are reasonably necessary to allow for quick and certain service.”²

The cable proposal for number portability, on the other hand, reflects the more narrow service offerings of this segment of the industry. By eliminating fields that are necessary to the broader industry, ATIS believes that the cable proposal would significantly disrupt the ability of service providers to port numbers in a timely and accurate manner. AT&T may have put it best when it said “the *Cable Proposal* appears based on the belief that less is more. Sometimes, however, less is just less.”³

ATIS appreciates that the Comcast Corporation and Cox Communications, Inc. have acknowledged in their comments that one additional field may be necessary to accomplish a port and therefore no longer object to the inclusion of the NPDI field as one of the minimum number of fields that may be required.⁴ It therefore appears that there are nine (9) fields in common between the two proposals:

- PON (Purchase Order Number)
- AN (Account Number)
- DDD (Desired Due Date)

¹ Joint Comments of Sprint Nextel Corporation, T-Mobile USA Inc., Verizon, Verizon Wireless, Quest Corporation, CTIA – The Wireless Association® and U.S. Cellular Corporation (the Joint Commenters), filed Feb. 16, 2010, in WC Docket No. 07-244 and CC Docket No. 995-116 at p. 5.

² Comments of AT&T, Inc., filed Feb. 16, 2010, in WC Docket No. 07-244 and CC Docket No. 995-116 at p. 4.

³ AT&T comments at p. 5.

⁴ Comments of Comcast Corporations and Cox Communications, Inc., filed Feb. 16, 2010, in WC Docket No. 07-244 and CC Docket No. 995-116 at p. 12.

- CC (Company Code)
- NNSP (New Network Service Provider Identification)
- ZIP (5-digit ZIP Code)
- PORTED NBR (Ported Telephone Number)
- VER (Version of the Port Request)
- NPDI (Number Portability Direction Indicator)

However, ATIS disagrees with Comcast/Cox that the five additional fields identified in the OBF/LNPA WG industry proposal are “extraneous” and should not be required.⁵ As noted above, the Comcast/Cox view appears to be based primarily on their more narrow business needs regarding the porting of telecommunications services – they simply do not order or provision the same services to other service providers and therefore do not see the need for certain fields. As AT&T correctly notes in its comments, “[w]hat may appear to be ‘extraneous’ data fields to Cable-TV Providers are not so for incumbent and competitive LECs.”⁶

CCNA. ATIS disagrees that the CCNA (Customer Carrier Name Abbreviation) field is extraneous. This field identifies the service provider placing the order and it is not, as Comcast/Cox claim, the third time this type of information is provided in the fourteen fields.⁷ The CCNA is a unique identifier that is used internally by companies to identify necessary information such as the product being ordered and the state. The CCNA is not the same as the CC (Company Code), which is used to identify the billing party by state, or the NNSP (New Network Service Provider Identification), which identifies the new company that will provide the network facilities. Some service providers may have multiple CCs and SPIDs associated with a particular CCNA.

⁵ *Id.*

⁶ *Id.* at p. 6.

⁷ AT&T comments at p. 4.

The CCNA field is a clear example of how the cable proposal reflects a narrow subset of the overall communications industry. While there may be a one-to-one relationship between CCNA, CC and SPID for Comcast Corporation or Cox Communications, this is not the case for many other service providers. As AT&T notes, the “[u]se of the CCNA code is pervasive in the ordering processing systems of many LECs who trade with many carriers – from small to large. The loss of CCNA field would stop all automatic flow-through order processing for those companies that presently rely on this field.”⁸

REQTYP. ATIS also strongly disagrees with Comcast/Cox that the REQTYP (Requisition Type) field “states the obvious” and therefore is not necessary.⁹ This field identifies the type of order being processed and, while it may be obvious that REQTYP “C” is associated with porting, there are many other REQTYPs in use by the broader industry. Therefore, without this field, there is no way for the majority of service providers to determine whether the order received is for local number portability or for another product.

ACT. The ACT (Activity Type) field is another field that is incorrectly identified as unnecessary by Comcast/Cox.¹⁰ As ATIS explained in its comments, this field identifies the activity involved in the Local Service Request (LSR) and, in concert with the REQTYP, identifies the product being ordered. Without ACT, the majority of service providers would not be able to determine the type of order being submitted. As AT&T further explains, “[i]f the LSR were used solely for porting, the ACT field would be

⁸ AT&T comments at p. 8.

⁹ Comcast/Cox comments at p. 7.

¹⁰ AT&T Comments at p. 10.

unnecessary as the activity could be assumed. Where the LSR is used for multiple requisitions, however, the activity cannot be assumed.”¹¹ Moreover, the absence of this field would prevent the use of existing LSR process automation, thereby requiring all simple ports to be processed manually and frustrating compliance with the one-day porting interval.

ATIS also disagrees with Comcast/Cox that there is any significance to the fact that this field was not identified in the Simple Port Request Form, which was created by the OBF in July of 2008.¹² A comparison between the SPSR and the current OBF/LNPA WG industry proposal is an “apples to oranges” comparison. The SPSR was an attempt at creating a stand-alone form for simple ports only. Many in the industry chose not to implement this new form based on a variety of reasons, including the cost of implementation and the fact that the form did not include some fields necessary for intermodal porting. In addition, because the SPSR was to be used only for simple ports, if a non-simple port order was erroneously submitted on a SPSR the order would be rejected and would have to be resubmitted in the appropriate format. Instead, the industry worked on the OBF/LNPA WG industry proposal, which represents the industry’s best thinking about the fields that may be required for simple wireline-to-wireline and intermodal ports.

AGAUTH. ATIS also disagrees with Comcast/Cox regarding the need for the AGAUTH (Agency Authorization Status) field. ATIS believes that this field is necessary to reduce inadvertent ports and provide some sense of security for the end user that their number(s) will not be ported without their permission. As ATIS made clear in its comments, this field does not require any information from the Letter of Agency (LOA).

¹¹ Comments of COMPTTEL, filed Feb. 16, 2010, in WC Docket No. 07-244 and CC Docket No. 995-116 at p. 3.

¹² Comcast/Cox comments at p. 8.

Nor does it require the New Service Provider to provide a copy of the LOA or the Old Service Provider to make any independent determination or evaluation regarding the LOA. This field is simply a check box indicating that the New Service Provider has an LOA and assumes the associated responsibilities.

TEL NO (INIT). Comcast/Cox also mischaracterize the TEL NO (INIT) (Initiator's Telephone Number) field as "redundant" and "completely unnecessary."¹³ ATIS disagrees and notes that this field, which specifies the contact telephone number for the initiator of the Local Service Request (LSR), is extremely valuable to the timely resolution of questions/concerns especially given the size of communications companies and the sheer number of personnel assigned to ordering processes.

Other parties also share ATIS' view on the value of this field. Charter Communications, Inc. notes that the TEL NO (INIT) information is "crucial" to resolving problems quickly and efficiently.¹⁴ "If there is a problem in the porting process, a phone call to the right contact can often resolve the problem without further errors or delays. However, determining the right person and telephone number to contact can take considerable time and effort."¹⁵

ATIS disagrees that the inclusion of the TEL No (INIT) could delay the porting process, as Comcast/Cox maintain.¹⁶ This field provides information that would supplement, rather than replace, other available information. Clearly, if an LSR was

¹³ *Id.* at p. 11.

¹⁴ Comments of Charter Communications Inc., filed Feb. 16, 2010, in WC Docket No. 07-244 and CC Docket No. 995-116 at p. 4.

¹⁵ *Id.* ATIS supports the proposal made by AT&T in its comments that if the TEL NO is not determined to be a required field for simple-port LSRs, the Commission should determine that carriers who choose not to provide this information are precluded from recovering damages for ports that could have been timely completed if a call-back telephone number had been provided. AT&T comments at p.12, n.22.

¹⁶ Comcast/Cox comments at p. 12.

submitted via GUI, e-mail or EDI, questions or concerns could be posed through this mechanism. However, if such mechanisms were unavailable or not utilized, the availability of the initiator's telephone number would be extremely valuable. ATIS agrees with Charter Communications that there is "zero risk" that ports will be delayed by requiring use of this field.¹⁷

ATIS strongly agrees with AT&T that the additional fields identified above do not present a significant burden. "All of the Majority Recommendation's 14 data fields are in use today on most LSRs; thus, the Majority Recommendation is not introducing new or foreign data values. Just as important, however, is the fact that there is only a 17-keystroke difference between the Cable Proposal and the Majority Recommendation."¹⁸ Moreover, as ATIS has previously noted, four of these five fields could be populated automatically by service provider (especially by those that order one product or service), further mitigating the burden associated with these fields. In particular, the REQ TYP, ACT, CCNA, AGAUTH could be "auto-populated."

II. There is Broad Support for Standardization of the Local Service Request Forms and Porting Processes

ATIS notes that virtually all commenters support standardization of the forms and processes used for number porting. Cox/Comcast, AT&T, Charter, Sprint-Nextel, T-Mobile USA, Verizon, Verizon Wireless, Qwest Corporation, U.S. Cellular, CTIA – The Wireless Association®, and the California Public Utilities Commission all support standardization in one manner or another. As Charter notes in its comments, "the numerous disparate fields used by different providers can lead to errors and substantial delays. Such delays harm

¹⁷ Charter comments at p.4.

¹⁸ AT&T comments at p. 12. ATIS notes that, with the acknowledgement by Comcast/Cox that the NPDI (Number Portability Direction Indicator) is necessary in some ports, the keystroke difference is now sixteen.

consumers and thwart competition, as consumers may attribute the delays to their new service providers.”¹⁹

ATIS notes there is also broad support that such standardization should occur around the existing industry-developed processes and forms.²⁰ ATIS agrees with AT&T that “consumers benefit from a more accurate process that is essentially already in place, and providers are not disadvantaged competitively or financially by adopting the Majority Recommendation, which builds on the existing LSR processing structure.”²¹ This view is also supported by Comptel, which correctly notes that standardization will help “alleviate the potential for substantial costs on the industry.”²²

In addition to minimizing disruption to the existing processes, the standardization of the LSR forms will assist the industry in meeting the implementation deadline for one-day porting. As the Joint Commenters note, “without such standardization it will be difficult, if not impossible, to meet the Commission’s mandate for one business day porting.”²³ ATIS strongly agrees that time is of the essence in this matter. For instance, the testing between local system vendors and NPAC begins March 15, 2010. ATIS therefore reiterates its request that the FCC act quickly and mandate industry-wide use of the ATIS-developed porting fields, forms and processes, effective no later than August 2, 2010, the date it has established for the initial implementation of the one-day porting interval.

¹⁹ Charter Communications comments at p. 2.

²⁰ ATIS notes that the reference to “forms” includes both electronic forms and manual ordering templates.

²¹ AT&T comments at p. 5.

²² Comptel comments at p.2

²³ Joint Commenter comments at p. 5.

ATIS does not believe that a new stand-alone porting form should be established, as supported by the California Public Service Commission.²⁴ There is no way that service providers could revamp their systems to accommodate a brand new form by the date established by the Commission for one-day porting. Such a form also would be extremely costly to the industry, which is one of the many reasons the SPSR was ineffective in accomplishing simple ports. Perhaps, most importantly, the establishment of a new form and associated process could also delay ports, negatively impacting the end user, because any non-simple port orders that are erroneously submitted on a new, simple-port only form would have to be rejected and resubmitted in the appropriate format.

III. Conclusion

There is strong support from comments for the OBF/LNPA WG industry proposal and the standardization of the porting processes and forms. As many commenters note, the OBF/LNPA WG industry proposal is the best approach to address the complexities inherent with number portability and to meet the needs of service providers that offer more than a single telecommunications product to other providers. Therefore, ATIS urges the Commission to adopt this proposal to mandate the use of ATIS OBF local service processes, forms and fields consistent with the OBF/LNPA WG industry proposal.

Respectfully submitted,

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²⁴ Comments of California Public Utilities Commission and the People Of The State Of California., filed Feb. 16, 2010, in WC Docket No. 07-244 and CC Docket No. 995-116.