

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

COMMENTS OF COMPTTEL

COMPTTEL hereby submits these comments in response to the Commission’s Public Notice (DA 09-2569) released on December 8, 2009. In its *Notice* the Commission seeks comment on what fields are necessary in order to complete simple ports within the one business day interval and, in particular, the proposal submitted by the North American Numbering Council Local Number Portability Administration Working Group (“NANC LNPA WG Proposal”) and the proposal submitted by the National Cable & Telecommunication Association, Cox Communications, and Comcast Corporation (“Cable Proposal”). COMPTTEL supports the NANC LNPA WG Proposal.

In its *2007 LNP Order*, the Commission concluded that LNP validation should be based on no more than four fields for simple ports. It identified those fields as (1) 10-digit telephone number; (2) customer account number; (3) 5-digit zip code; and (4) pass code (if applicable).¹ Both the NANC LNPA WG Proposal and Cable Proposal recognize that this is insufficient and, instead, identify a common subset of eight fields that are defined in the ATIS Local Service Request forms and processes as required to accomplish a simple port. These common fields are:

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

¹ *In the Matter of Local Number Portability Porting Interval and Validation Requirements*, WC Docket Nos. 07-243, 07-244, 04-36, CC Docket Nos. 95-116, 99-200, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, FCC 07-188, ¶ 2 (2007)(“2007 LNP Order”).

- NNSP (New Network Service Provider Identification)
- ZIP (5-digit ZIP code)
- PORTED NBR (Ported Telephone Number)
- VER (Version of the Port Request)

COMPTEL agrees that these fields are necessary to accomplish a port. COMPTEL also agrees that the Commission should adopt standardized local service request forms and porting processes, namely the ATIS developed porting fields and processes, to be effective at the same time as the one-day porting interval rule. Standardization, which is also supported by both proposals, will alleviate the potential for substantial costs burdens on the industry and assist in the successful processing of ports in compliance with the one-day rule.

The difference in the two proposals centers on six fields identified by the NANC LNP WG as necessary to complete a port, which are absent from the cable proposal. As explained below, COMPTEL agrees that all fourteen fields identified by the NANC LNP WG are necessary to complete the port in the requisite time, including the following six fields which the cable companies have requested be excluded: CCNA (Customer Carrier Name Abbreviation); REQTYP (Requisition Type and Status); ACT (Activity); NPDI (Number Portability Direction Indicator); and TEL NO (INIT).

The cable companies claim these fields are unnecessary for processing simple ports. But they are only evaluating the situation from their limited perspective. The Commission's rules must address the industry as a whole in ensuring that the necessary information is provided. For example, the cable companies assume that there is only one type of activity in processing a local service order request ("LSR"). While this may be the case for cable companies, for Old Service Providers that offer multiple products the REQTYP field notifies the Old Service Provider whether the New Service Provider is requesting number portability, a loop with number portability, resale, a port or any other number of products. Providing this information will go a long way toward ensuring that carriers can meet the one-day porting interval.

As another example, while the CCNA and CC may be the same in the case of Comcast Corporation and Cox Communications, this is not the case for other service providers. Consequently the CCNA, which identifies the service provider placing the order, is necessary (in addition to the CC) to prevent porting errors and associated delays for a substantial number of providers. On the other hand, companies that have only one CCNA could simply have their systems set up to automatically populate the data in this field for ease of ordering.

In short, the cable companies have not identified a significant burden in populating the fourteen fields proposed by the NANC LNP WG and seem to agree that a standardized process is needed for compliance with the one day porting interval. In adopting a standardized process the Commission must ensure that all providers' needs are met.

Respectfully Submitted,

/s/

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