

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Telephone Number Requirements for IP-Enabled Services Providers)	WC Docket No.07-243
)	
Local Number Portability Porting Interval and Validation Requirements)	WC Docket No. 07-244
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues)	
)	
Final Regulatory Flexibility Analysis)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200

Comments of the Alliance for Telecommunications Industry Solutions

Pursuant to Section 1.415 of the Federal Communications Commission’s (Commission) rules, the Alliance for Telecommunications Industry Solutions (ATIS), on behalf of the ATIS Ordering and Billing Forum (OBF), hereby submits these comments in response to the November 8, 2007, *Notice of Proposed Rulemaking (NPRM)* regarding local number portability.¹ Due to the inherent complexity of the porting process and the differences between wireline, wireless and intermodal (wireline to/from wireless) porting, ATIS urges the Commission to carefully consider the impact that any new porting rules may have on the industry and on end users.

¹ *Notice of Proposed Rulemaking*, WC Docket No. 07-243 (released Nov. 8, 2007).

Background

ATIS is a technical planning and standards development organization accredited by the American National Standards Institute (ANSI) and committed to rapidly developing and promoting technical and operational standards for communications and related information technologies worldwide using a pragmatic, flexible and open approach. The ATIS membership spans all segments of the industry, including local exchange carriers, interexchange carriers, wireless equipment manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, providers of commercial mobile radio services, broadband providers, software developers, consumer electronics vendors, digital rights management companies, central authentication service companies and internet service providers. Industry professionals from more than 300 communications companies actively participate in ATIS' open industry committees and other forums.

The ATIS Ordering and Billing Forum (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 ATIS OBF has several committees that work on and resolve, among other things, issues related to number porting. The Local Service Ordering and Provisioning (LSOP) Committee of the OBF examines the business processes and documentation management issues associated with local service ordering and provisioning. The LSOP's Local Service Migration Subcommittee identifies and recommends resolutions for ordering, billing, and information exchange issues related to the migration of local service between wireless, wireline and broadband carriers. Another ATIS OBF standing committee, the

Wireless Committee, identifies and resolves technical and operational issues related to wireless communication interfaces and associated processes. The Wireless and LSOP Committees also work together (under the auspices of the OBF Intermodal Subcommittee) to address issues that impact both segments of the industry as they relate to intermodal local number portability.

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 Inter-carrier Communications Interface Specification (WICIS). The ATIS OBF has also developed guidelines to assist in wireless-to-wireless porting.

The Wireless Intercarrier Communications Interface Specification (WICIS) for Local Number Portability provides guidelines for wireless-to-wireless migrations.

The ATIS OBF takes very seriously its role in promulgating voluntary industry guidelines for use by the telecommunications industry. Since the release of the *NPRM* and the related rulings in the above-referenced proceedings, the ATIS OBF has made significant progress in revising its porting guidelines and forms in light of these rulings.

Error Rates/Fall out

In the *NPRM*, the Commission seeks comment on a number of issues related to the porting of telephone numbers in light of the new rules established in the *Declaratory Ruling*. As a general matter, ATIS recommends the Commission approach any further changes to the porting rules carefully and consider fully the impact that new changes may have on the industry and, more importantly, on end users. Such caution is warranted given the substantial changes made by the Commission in its *Declaratory Ruling* and *Report and Order* in this proceeding and the complex nature of the service migration process.

The *NPRM* seeks comment on how the information required for the four validation fields adopted in the *Declaratory Ruling* affects the validation process.² While ATIS supports the Commission's goal of reducing the amount of information required for validation, ATIS is concerned about the potential impact that the Commission's new validation rules may have on error rates and customer fall out. ATIS' concern is largely based on two factors: (1) the complexity of the systems involved in wireline, wireless

² *NPRM* at ¶56.

and intermodal porting; and (2) potential misunderstandings by industry participants over the meaning of the Commission's new porting rules.

Service migration is a complex process involving the integration of different procedures between multiple service providers. It is made more complex by the myriad of players in the marketplace, including wireline, wireless and resellers, each of which has different business processes. For instance, while wireline providers may use the customer's service address to accomplish a port because they have a physical connection to their customer's telephone, wireless carriers use the customer's billing address. This difference in business processes can result in a number of porting problems.³ The complexity of the systems involved and the differences in business practices means that there can be no single set of fields that can be established for all porting. Instead, wireline-to-wireline, wireless-to-wireless and intermodal porting will have different data requirements.

The error and fall out rates will also be affected by the different interpretations of the new rules that may exist in the industry. In the *Declaratory Ruling*, the Commission established new rules regarding the fields that may be used to "validate" the porting of telephone numbers. Despite the fact that the ruling specifically addressed only the "validation" fields, there are some in the industry that have expressed the view that these four fields are the only fields that may be required to "provision" ports. This view is contrary to the consensus reached by OBF members, which have identified that additional fields are necessary to accomplish wireline-to-wireline, wireless-to-wireless

³ Even within a specific segment of the industry, there are complexities that must be considered. Wireline carriers have implemented different Operating Support Systems (OSS) and have unique business needs. It is because of these reasons that wireline carriers have not uniformly implemented the same version of the ATIS LSOG.

and intermodal service migrations. This misunderstanding about the requirements of the new rules will cause an increase in the error or fall out rates if some carriers fail to provide the information that is reasonably necessary to accomplish a port.⁴

ATIS noted its concern regarding potential confusion regarding the new rules during its February 8 meeting with representatives from the Wireline Competition Bureau. During that meeting, representatives from the ATIS OBF explained the complexities surrounding number portability and the differences between wireline-to-wireline porting, wireless-to-wireless porting and intermodal porting. ATIS also noted that, while there was a broad understanding among OBF members that additional fields would be necessary for provisioning a port, ATIS had become aware that there were some in the industry that did not fully appreciate the differences between wireless, wireline and intermodal porting.

The ATIS OBF is diligently working to both educate the industry regarding the new rules and to revise its industry guidelines to enhance compliance with the new and proposed rules. The OBF LSOP, for instance, has developed a new simple port process, the Simple Port Service Request (SPSR), in compliance with the *Declaratory Ruling*.⁵

⁴ On February 5, 2008, One Communications Corp. filed a Petition for Clarification and for Limited Waiver for Extension of Time (*One Communications Petition*) in this proceeding to seek clarification regarding this issue. The oppositions that have been filed in response to the *One Communications Petition* demonstrate that there are segments of the industry that misunderstand the difference between the fields that may be used to validate a port and those that are used to provision a port. *See, e.g.*, Opposition to Petition for Clarification/Reconsideration of One Communications Corp. filed by Charter Communications, Inc. and Charter Fiberlink, LLC (filed February 15, 2008); Opposition of the National Cable & Telecommunications Association (filed February 15, 2008); Opposition of Comcast Corporation (filed February 15, 2008).

⁵ The Simple Port Service Request was filed with the Commission on January 16, 2008, shared with the North American Numbering Council's Local Number Portability Administration Working Group on January 7, 2008, and will be included in the 3rd Quarter 2008 LSOG release.

The SPSR identifies those fields necessary to provision a wireline-to-wireline simple port. The SPSR has been made publicly available free of charge, and has been filed on the record in this docket.⁶

The ATIS OBF Wireless Committee has determined that there will be no changes made to WICIS 3.1.0 or WICIS 4.0.0 message formats at this time, and any changes required will be made by carriers to their back office systems.⁷ Additionally, an educational effort was carried out by ATIS, on behalf of the OBF, by distributing an industry-wide announcement regarding the specific Response Codes (RCODES) from the ATIS WICIS which indicates that these codes should not be used when processing simple ports.⁸ This announcement promotes awareness of the new rules by all industry participants. The Wireless Committee is also continuing its work to identify changes that will improve the wireless porting process.

In addition wireline and wireless carriers are working together to determine the changes required by the new rules for intermodal porting. During the last full OBF Meeting (OBF #101) in late January 2008, the Intermodal Subcommittee met to further analyze the intermodal porting process in light of the new rules and the SPSR. The subcommittee also began to correlate the fields used for wireless-to-wireless porting with

⁶ Similarly, the OBF LSOP is modifying the Local Service Migration Guidelines to support compliance with the new porting rules.

⁷ Version 3.1.0 is the current version of the Wireless Inter-carrier Communications Interface Specification in use by the wireless industry. Testing is currently underway for WICIS 4.0.0, which is scheduled for implementation in September 2008.

⁸ The announcement was sent out on January 22, 2008, and noted that it would no longer be acceptable to respond using certain codes as these would not be fields on which carriers could validate under the *Declaratory Ruling*. The codes are: 1E- end user not ready; 6C- customer information does not match; 6P- Mobile Directory Number (MDN) has service provider port protection; 7C- Prepay MDN; 8B- SSN/Tax ID required or incorrect; 8E- first name required or incorrect; 8F- last name required or incorrect; and 8G- business name required or incorrect.

those used for wireline-to-wireline porting, with a goal toward identifying those fields that are necessary to accomplish intermodal porting and the creation of an OBF Standard intermodal specific practice and form. In the interim, and as is the current Industry standard,⁹ intermodal porting can be accomplished utilizing the wireline-to-wireline forms and preparation guidelines, inclusive of the SPSR.

Simple Ports

In the *NPRM*, the Commission also seeks comment on other considerations that it should evaluate in the simple port validation process.¹⁰ While the Commission has provided guidance regarding how simple ports are defined, ATIS remains concerned that carriers may encounter difficulties in identifying these ports and in distinguishing them from complex ports.

As described in the *NPRM*, simple ports are those ports that: “(1) do not involve unbundled network elements; (2) involve an account only for a single line; (3) do not include complex switch translations (*e.g.*, Centrex, ISDN, AIN services, remote call forwarding, or multiple services on the loop); and (4) do not include a reseller.”¹¹ All other ports would, by necessity, be complex ports.

ATIS notes that this definition includes characteristics regarding a port that may only be known to the porting-out carrier. Wireless carriers, cable providers or any other winning provider porting-in a number from a wireline carrier may not be able to identify whether a port involves complex services, such as, Centrex, Hunt Groups or DSL. The

⁹ NANC Inter-Service Provider LNP Operations Flows Version 2.0 (July 9, 2003).

¹⁰ *NPRM* at ¶56.

¹¹ *NPRM* at ¶46, n. 153 (citations omitted).

identification of simple ports is particularly challenging when dealing with retail point-of-sale transactions, where access to the customer service record (CSR) is not available for security reasons associated with the protection of customer information. Without a CSR, it is not possible for a porting-in carrier to accurately characterize a port (whether simple or complex) and, therefore, to provide the appropriate validation or provisioning information based on whether it is simple or complex.

Identification of Errors

The Commission also seeks comment in the *NPRM* on whether carriers should be required to identify all errors possible in a given Local Service Request (LSR) and describe the basis for rejection when rejecting a port request.¹² ATIS opposes this requirement as both technically infeasible and unnecessary.

Significant technical obstacles exist to the implementation of such a requirement due to the carrier Operating Support Systems (OSS) currently in place. These systems cannot process requests that fail to provide or which contain inaccurate information pertaining to key fields. Such fatal (or system) errors would prevent the further processing of the request until such information is provided or corrected. In such cases, it would not be technically feasible to identify all errors possible on a particular request at the time that the port request is rejected.

ATIS also does not believe this requirement is necessary, particularly in light of the Commission's new mandate regarding the use of only four fields for simple port

¹² *NPRM* at ¶57.

validation and the industry's work to identify the limited number of fields for the provisioning of simple ports.

Conclusion

ATIS recommends that any further changes to the porting rules be drafted with careful consideration of the potential impact that new changes may have on the industry and on end users. ATIS is concerned that the complexity of the porting process and the potential for different interpretations of the new rules within the industry may adversely affect error rates and customer fall out. Additionally, ATIS is concerned that carriers may encounter difficulties in identifying simple ports and in distinguishing them from complex ports. Finally, ATIS opposes the establishment of a requirement that carriers identify all errors present on a given LSR and describe the basis for rejection when initially rejecting a port request as both unnecessary, due to the new simple port process, and technically infeasible.

WHEREFORE, THE PREMISES CONSIDERED, ATIS respectfully submits these comments in response to the *NPRM* in the above-referenced proceedings.

Respectfully submitted by:

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