

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

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| 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 NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS**

In an October 31, 2007 adopted *REPORT AND ORDER, DECLARATORY RULING, ORDER ON REMAND, AND NOTICE OF PROPOSED RULEMAKING*¹ released November 8, 2007, and published in the Federal Register February 21, 2008, the Federal Communications Commission (FCC or Commission), adopted needed reforms to the local number porting (“LNP”) process, including a requirement that validation for simple ports may require no more

¹ *In the Matter of Telephone Number Requirements for IP-Enabled Services Providers; Local Number Portability Porting Interval and Validation Requirements, REPORT AND ORDER, DECLARATORY RULING, ORDER ON REMAND, AND NOTICE OF PROPOSED RULEMAKING*, 22 FCC Rcd 19531 (2007), 73 Federal Register 9507 (February 21, 2008). *Order* refers to the REPORT AND ORDER, DECLARATORY RULING, AND ORDER ON REMAND, and *NPRM* refers to the NOTICE OF PROPOSED RULEMAKING.

than four fields.² The associated *NPRM* specifically sought comment on if the FCC should (i) extend local number portability (LNP) requirements and numbering related rules, including compliance with N11 code assignments, to interconnected Voice over Internet Protocol (VoIP) providers, and (ii) specify the length of porting intervals or other details of the porting process.

On November 14, 2007, the National Association of Regulatory Utility Commissioners (NARUC) passed two resolution specifically addressing issues raised in the *NPRM*. Specifically, the NARUC resolutions urge the FCC to:

- [1] *“[A]ssure its [porting] rules and orders require fair and equitable enforcement of all requirements on all of the porting service providers;” and*
- [2] *“[E]stablish a one business-day interval for simple ports that are requested by electronic interface, or a longer period if wireline carriers individually demonstrate that they cannot accomplish reliable ports within that limit, after they have made all reasonable cost-effective efforts to upgrade electronic systems;” and*
- [3] *“[M]odify or reinterpret its Part 52 numbering rules to allow interconnected VoIP providers to obtain numbering resources directly from the NANPA and the PA and to obtain service-provider access to the NPAC;” and*
- [4] *“[I]mpose equally on all entities obtaining numbering resources directly from the NANPA or the PA the applicable numbering obligations to comply with the Commissions Part 52 rules and requirements,” including “requirements such as periodic reporting on the usage of numbering resources, and utilization and months-to-exhaust standards for obtaining new numbering resources.”*

Copies of these resolutions are attached as an appendix to these comments. In support of these positions, NARUC states as follows:

² Order ¶ 48.

NARUC'S INTEREST

NARUC is a nonprofit organization founded in 1889. Congress and the courts have consistently recognized NARUC as a proper entity to represent the generic interests of the State utility commissions. In the Communications Act,³ Congress references NARUC as “the national organization of the State commissions” responsible for economic and safety regulation of the intrastate operation of carriers and utilities.⁴ There is no question that this proceeding raises a serious issue of considerable importance to NARUC’s member commissions. In October of 2007, NARUC filed an ex parte in related proceedings outlining NARUC’s most recent policy stances in several related proceedings. The cited November 2008 resolutions elaborate and reinforce an earlier July 2007 resolution that was attached to NARUC’s October 2007 filing.

DISCUSSION

The FCC porting rules and orders should apply uniformly and assure “fair and equitable enforcement of all requirements on all of the porting service providers.”

In 1996, Congress added Section 251(b)(2) to the Communications Act. That section requires all local exchange carriers (“LECs”) to offer number portability as per FCC rules.⁵ In 1996, the Commission determined that the public interest would be served by extending the portability requirement to wireless carriers, as well as LECs.⁶ *NARUC strongly supported this FCC initiative.* NARUC filed numerous pleadings agreeing with the FCC’s assessment that the competition resulting from portability “should foster lower local telephone prices and,

³ *Communications Act of 1934, as amended by the Telecommunications Act of 1996*, 47 U.S.C. §151 et seq., Pub.L.No. 101-104, 110 Stat. 56 (1996) (West Supp. 1998) (“Act” or “1996 Act”).

⁴ See 47 U.S.C. § 410(c) (1971) (NARUC nominates members to FCC Joint Federal-State Boards which consider universal service, separations, and related concerns and provide formal recommendations that the FCC must act upon); Cf. 47 U.S.C. § 254 (1996) (describing functions of the Joint Federal-State Board on Universal Service). Cf. *NARUC, et al. v. ICC*, 41 F.3d 721 (D.C. Cir 1994) (where the Court explains “...Carriers, to get the cards, applied to...(NARUC), an interstate umbrella organization that, as envisioned by Congress, played a role in drafting the regulations that the ICC issued to create the “bingo card” system.)

⁵ See 47 U.S.C. § 251(b)(2).

⁶ See *Telephone Number Portability*, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8352 ¶ 153 (1996) (“*First Porting Order*”).

consequently, stimulate demand for telecommunications services and increase economic growth.”⁷ More recently, in 2007, the FCC noticed for comment a T-Mobile USA, Inc., and Sprint Nextel Corporation request “...that all carriers obligated to provide number portability may not obstruct or delay the porting process by demanding from the porting-in carrier information in excess of the minimum information needed to validate the requesting customer.” Based on a February 21, 2007 resolution, NARUC filed comments joining comments filed by its members in California, Nebraska, and Iowa encouraging the FCC to establish “...a simple and uniform industry porting process.”

In the companion *Order* to this *NPRM*, the FCC adopted a requirement that LNP validation for simple ports may require no more than four defined fields. In granting T-Mobile and Sprint relief, the FCC recognized, it is “critical that customers be able to port their telephone numbers in an efficient manner . . . for LNP to fulfill its promise of giving ‘customers’ flexibility in the quality, price, and variety of telecommunications services.”⁸ NARUC agrees. The *Order* was a necessary first step, but, as the *NPRM* suggests, *additional measures are needed*.

At a minimum, the FCC needs to clarify all of its porting requirements, including maximum intervals, apply *uniformly* to ALL interconnected voice providers, including VoIP. If a carrier is using NANPA resources, it should not be able to claim it is not bound by the FCC’s porting requirements to stymie competition by delaying or effectively blocking customer access to new providers. As the November resolution points out: “service providers are competitively disadvantaged and consumers are inconvenienced when not permitted to promptly transfer existing numbers to competing service.”

⁷ *First Porting Order* ¶ 30.

⁸ *Order* ¶ 54.

The FCC should “establish a one business-day interval for simple ports that are requested by electronic interface, or a longer period if wireline carriers individually demonstrate that they cannot accomplish reliable ports within that limit, after they have made all reasonable cost-effective efforts to upgrade electronic systems.”

The FCC action on the Sprint-T-Mobile request recognizes that the longer the port takes, the greater the impact on competition and customer choice. This is not the first time porting intervals have been discussed. To its credit, the FCC has consistently moved to streamline the porting process. NARUC has supported these efforts.⁹

In 1997, the FCC adopted the NANC's recommendation of a four business day porting interval for wireline-to-wireline ports.¹⁰ In 2003, the FCC sought comment on whether carriers should be required to reduce the four business day interval for ports between wireless and wireline.¹¹ In 2004, in response to a North American Numbering Council proposal, the FCC sought comment on shortening the intermodal porting interval for simple ports to 53 hours.¹²

Although processes in the industry have benefited from great advances in technology, including in particular the speed of service provisioning and delivery, the wireline-to-wireline porting interval has remained at 4 days for over 10 years. *This makes no sense.* The FCC is correct in tentatively concluding that the Commission “should adopt rules regarding a reduced porting interval.” NPRM at ¶ 63. However, it appears the FCC is suggesting a longer time frame than appears necessary. Porting between wireless service providers is accomplished

⁹ For example, in 2002, NARUC adopted a resolution encouraging wireless carriers to implement number portability within the time set by the FCC.

¹⁰ See North American Numbering Council Local Number Portability Selection Working Group Final Report and Recommendation to the FCC, Appendix E (rel. April 25, 1997); 47 C.F.R. § 52.26. See also *In the Matter of Telephone Number Portability*, CC Docket No. 95-116, Second Further Notice of Proposed Rulemaking, 19 FCC Rcd 18515 at ¶ 2. (2004).

¹¹ The underlying order required intermodal porting. See *In the Matter of Telephone Number Portability*, CC Docket No. 95-116, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, FCC 03-284 (rel. Nov. 10, 2003).

¹² See *In the Matter of Telephone Number Portability*, CC Docket No. 95-116, Second Further Notice of Proposed Rulemaking, FCC 04-217 (rel. Sept. 16, 2004). Under this proposal, the Confirmation Interval would be five hours after port request and the Activation Interval would be 48 hours after port response.

within two and-one-half hours using the same industry database that is used for wireline porting.¹³ The implementation of electronic interfaces makes it technically feasible to complete simple ports between wireline-service providers on a next-day basis. Indeed, many major wireline carriers have already implemented electronic bonding solutions that provide a near real-time electronic interface between the operations support systems of the porting-in and porting-out providers.¹⁴ The FCC should act now to revise the interval - at least for simple ports.¹⁵ It should require next-day number porting for providers that have implemented electronic bonding solutions. If a port request is submitted by electronic interface, there is no reason to allow a longer period. NARUC's resolution specifies a "one business day" interval for "simple" wireline-to-wireline ports requested by electronic interface. This limit should apply to the entire porting process, beginning with the submission of a Local Service Request by the new carrier and ending with the actual port of the number to the new carrier. Only individual wireline carriers that can prove to the FCC they cannot accomplish reliable ports within that limit, after reasonable and cost-effective efforts to upgrade their electronic systems, can be excluded. Logically, wireline carriers seeking such relief would need to seek a waiver from the FCC as soon as the new interval is established by the Commission.

¹³ Telephone number porting occurs in two stages: Confirmation and Activation. The Confirmation Interval begins with a Local Service Request from the new carrier and ends with a Firm Order Confirmation from the existing carrier. For ports involving wireline carriers, the allowed Confirmation Interval is 24 hours. The Activation Interval involves system updates and the physical work required to complete a simple port. For ports involving wireline carriers, the allowed Activation Interval is three business days.

¹⁴ Currently, Verizon, AT&T, and Qwest offer e-bonding solutions, including Electronic Data Interchange and eXtensible Markup Language gateways. The computer-to-computer interface established by e-bonding is distinct from a graphical user interface (GUI), which exists between a computer and a user. *See SWE-DISH Satellite Communications, Inc.; Application for Authority to Operate a Single Temporary-Fixed Earth Station in the Ku-Band Fixed-Satellite Service*, Order and Authorization, 19 FCC Rcd 16314, n.19 (IB 2004). When porting requests are submitted via an e-bonded solution, the fields in the request are automatically populated and electronic exchange of order information occurs without the need for human intervention.

¹⁵ NARUC's resolution defines "Simple ports" as ports that involve an account for a single line and: may include CLASS features such as Caller ID; do not involve multi-line accounts; do not involve unbundled network elements; do not involve complex switch translations such as Centrex or Plexar, ISDN, AIN services, remote call forwarding or multiple services on the loop; and do not include a reseller.

The FCC should impose equally on all entities obtaining numbering resources directly from the NANPA or the PA the obligations in the Commissions Part 52 rules including “requirements such as periodic reporting on the usage of numbering resources, and utilization and months-to-exhaust standards for obtaining new numbering resources.”

As noted, supra, NARUC believes that, at a minimum, the FCC needs to clarify all its *porting* requirements, including maximum intervals, apply *uniformly* to ALL interconnected voice providers, including VoIP providers. In ¶53 of the NRPM, the FCC also specifically seeks comment on “whether any of our numbering requirements, in addition to LNP, should be extended to interconnected VoIP providers.”

In the area of numbering and enforcement, as early as 1999, NARUC passed a resolution pointing out that: (1) unnecessary area code relief must be stopped through adoption of enforceable number conservation measures; (2) industry must be made accountable for use of public resources through mandatory compliance with specific rules and reporting requirements; and (3) States and NANPA need enforcement authority and States need the ability to participate in policy decisions relating to the implementation of conservation measures. These core principles were reaffirmed in a 2004 compilation of NARUC policy principles approved by both the Telecommunications Committee and the NARUC Board of Directors.

Subsequently, in a resolution adopted in February 2006, NARUC pointed out concerns raised in several States regarding the exportation of large quantities of North American Numbering Plan (NANP) numbers to customers in other States and countries and urged the FCC to provide leadership on numbering for IP-enabled service providers by developing a national policy for the assignment of numbers to IP-enabled service providers that balanced the impact on consumers burdened with additional area code relief with the needs of IP-service providers to bring new innovations to the marketplace. Since then, VoIP use of numbering resources has increased – which necessarily contributes to an increase in the rate of area code exhaust.

A July 2007 NARUC resolution specifically recognizes the need for a national policy regarding the assignment of numbering resources by the NANPA and the NPA to certificated carriers who obtain numbering resources on behalf of non-certificated service providers. Its focus - VoIP. To ensure such numbers are used in the most efficient manner possible, without limiting competition or the development of new technologies and services that benefit consumers, the NARUC urged the FCC then to:

- Act expeditiously to address numbering issues attributed to non-certificated service providers to stem the tide of inefficient number assignment such that area codes are not prematurely exhausted; and
- Promote efficient number conservation and utilization by requiring that all providers using numbering resources comply with all requirements of Part 52 of the FCC's regulations.

The most recent November 2007 resolution underlines the critical need for the FCC to expeditiously ensure that all providers using number resources comply with ALL of its Part 52 rules. Currently, only carriers with FCC licenses, waivers or State certification may apply directly to the NANPA or the NPA for access to telephone numbers subject to Part 52 numbering rules. The Part 52 rules require these carriers in part to participate in number pooling, port telephone numbers from carrier to carrier, file number resources utilization and forecast information and meet other number conservation requirements.

In contrast, many of the Voice over the Internet Protocol-based (VoIP) and other IP-enabled service providers using telephone numbering resources do not receive their numbers directly from the NANPA or the NPA. Instead, they are allocated to those providers as customers of FCC-licensed or State-certificated carriers. For example, when a block of one-thousand numbers is transferred from a CLEC to a VoIP or IP-enabled provider customer, the CLEC considers this block of assigned numbers as being 100% utilized even though it does not

regard it as a block of subscribers or access lines in service.¹⁶ Thus, the total assigned telephone numbers and utilization rates increase while CLEC subscribership decreases.

There is no official record of some VoIP number assignments. Consequently, these VoIP and IP-enabled providers lack the incentive to utilize their numbering resources efficiently. These IP-enabled providers can continually expand their number inventories unchecked because the rate at which they actually assign numbers is not reported. Nor are these providers subject to the FCC's 75% utilization rate before requesting additional resources from their CLEC partner.

This is a problem. The FCC and the States rely on Number Resources Utilization and Forecast data to project area code exhaust. The lack of this data undermines the utility and reliability of these forecasts.

Moreover, neither the NANPA nor the NPA have a reliable mechanism for directly monitoring the actual number utilization of service providers obtaining numbering resources from certificated carriers. Absent that data, the FCC and the States have no means of verifying VoIP or IP-enabled providers' telephone number utilization.

Also, the FCC and States are unable to determine whether these providers are using their numbering resources in an efficient manner or whether they have violated the Federal numbering rules by stockpiling number resources.

This issue is similar to that which occurred before the FCC mandated carrier utilization reporting in March 2000. When the FCC first mandated the filing of utilization and forecasting data, it did so to address premature code exhaust. Carriers were causing area codes to exhaust by expanding their number inventories beyond their true need. The FCC ordered the reporting of this data because it determined that the absence of this information was one of the major reasons

¹⁶ Assigned numbers are defined as numbers working in the Public Switched Telephone Network pursuant to an agreement such as a contract or tariff at the request of specific end users or customers for use, or numbers not yet working but associated with a pending customer service order.

leading to premature area code exhaust. Currently, the only control over non-certificated service provider number requests is through the CLECs themselves, which is all but nonexistent.

NARUC urges the FCC to continue promoting efficient number conservation and utilization by requiring non-certificated service providers using numbering resources to comply with the requirements of the Part 52 numbering rules. The resolution also suggests such carriers be given direct access to numbering resources.

CONCLUSION

The FCC should move quickly to adopt formal one day interval for simple ports and to continue promoting efficient number utilization by requiring non-certificated service providers using numbering resources to comply with the requirements of the Part 52 numbering rules.

Respectfully Submitted,

/s/ J. Bradford Ramsay

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Submitted: March 24, 2008

Appendix A - Resolution Regarding Revising Guidelines for Number Porting

WHEREAS, The National Association of Regulatory Utility Commissioners (NARUC) has consistently supported Local Number Portability as a means of encouraging competition, enabling consumer choice and achieving an efficient number system; *and*

WHEREAS, Telephone number porting occurs in two stages: Confirmation and Activation. The Confirmation Interval begins with a Local Service Request (LSR) from the new carrier and ends with a Firm Order Confirmation (FOC) from the existing carrier. For ports involving wireline carriers, the allowed Confirmation Interval is 24 hours. The Activation Interval involves system updates and the physical work required to complete a simple port. For ports involving wireline carriers, the allowed Activation Interval is three business days; *and*

WHEREAS, “Simple ports” are ports that involve an account for a single line and:

- may include CLASS features such as Caller ID;
- do not involve multi-line accounts;
- do not involve unbundled network elements;
- do not involve complex switch translations such as Centrex or Plexar, ISDN, AIN services, remote call forwarding or multiple services on the loop;
- do not include a reseller; *and*

WHEREAS, The current wireline-to-wireline porting interval of four days has been in place for almost 10 years, and although processes in the industry have benefited from great technological advances, in particular the speed of service provisioning and delivery, the wireline-to-wireline porting interval remains at 4 days; *and*

WHEREAS, The implementation of electronic interfaces has made it technically feasible to complete simple ports between wireline-service providers on a next-day basis; *and*

WHEREAS, Porting between wireless service providers is accomplished within two and-one-half hours using the same industry database that is used for wireline porting; *and*

WHEREAS, The North American Numbering Council has established a Local Number Portability Working Group (LNPA WG), and the LNPA WG has before it a Problem Identification Management (PIM) to reduce the porting interval to a next-day basis for simple ports accomplished through an electronic interface; *and*

WHEREAS, The FCC has before it a petition to minimize the criteria used to validate a Local Service Request (LSR), thereby enabling a reduction in the Confirmation Interval, and thus the overall porting interval; *and*

WHEREAS, A large number of service providers refuse to consistently comply with the FOC and activation periods for the existing wireline porting interval; *and*

WHEREAS, Service providers are competitively disadvantaged and consumers are inconvenienced when not permitted to promptly transfer existing numbers to competing service providers; *now, therefore, be it*

RESOLVED, That the National Association of Regulatory Utility Commissioners, convened in its November 2007 Annual Convention in Anaheim, California, directs the General Counsel of NARUC to pursue, by the best means available, changes in the FCC rules and orders: (1) to establish a one business-day interval for simple ports that are requested by electronic interface, or a longer period if wireline carriers individually demonstrate that they cannot accomplish reliable ports within that limit, after they have made all reasonable cost-effective efforts to upgrade electronic systems; and (2) that any such rules and orders require fair and equitable enforcement of all requirements on all of the porting service providers.

Sponsored by the Committees on Telecommunications and Consumer Affairs

Recommended by the NARUC Board of Directors, November 13, 2007

Adopted by the Committee of the Whole, November 14, 2007

Appendix B

Resolution Concerning Availability of Numbers to Voice over Internet Protocol Providers and IP-Enabled Services

WHEREAS, The National Association of Regulatory Utility Commissioners (NARUC) has long recognized the importance of efficient telephone number utilization, the need to avoid unnecessary area code changes, and prompt and efficient porting of consumers' telephone numbers; *and*

WHEREAS, A large and increasing number of American consumers are obtaining voice services from Voice over Internet Protocol (VoIP) and other Internet Protocol (IP) based service providers, either instead of or in addition to their service from traditional telecommunications carriers; *and*

WHEREAS, Pursuant to Section 251(e) of the Communications Act of 1934, as amended, including by the Telecommunications Act of 1996, rulemaking responsibility for the North American Numbering Plan (NANP) in the U.S. rests with the Federal Communications Commission (FCC); *and*

WHEREAS, The FCC has delegated day-to-day responsibilities for administering numbering resources to the North American Numbering Plan Administrator (NANPA) and the national thousands-block Pooling Administrator (PA), and local number portability is administered by the Local Number Portability Administration Center (NPAC); *and*

WHEREAS, The FCC recently acted to address local number portability and certain other numbering requirements related to VoIP and IP-enabled service providers, but did not address such providers reporting and utilization requirements; *and*

WHEREAS, Under current interpretations of FCC rules, only carriers with State certifications, FCC licenses, or waivers may receive telephone numbers directly from the NANPA or the PA, and requirements for service-provider access to the NPAC mirror these requirements and, as NARUC noted in its July 18, 2007, *Resolution Concerning Adherence to Numbering Rules by Voice Over Internet Protocol and IP-enabled Services Providers* (July Numbering Resolution), many VoIP and IP-enabled service providers therefore often obtain numbering resources from eligible FCC-licensed or State-certificated carriers; *and*

WHEREAS, As NARUC further noted in the July 2007 Numbering Resolution, because of this indirect allocation of numbers to VoIP and IP-enabled service providers, such providers are not directly subject to the reporting and utilization requirements in the FCC's existing Part 52 numbering rules that help ensure the efficient assignment and usage of numbers; *and*

WHEREAS, Because VoIP and IP-enabled service providers are often neither State-certificated nor FCC-licensed, they may lack service-provider access to the NPAC to promptly and efficiently port telephone numbers upon customer requests; *and*

WHEREAS, NARUC remains concerned about the potential impacts upon consumers of inefficient number assignment and use, accelerated area code exhaust, and delayed or incorrect number ports between service providers; *now, therefore, be it*

RESOLVED, That the National Association of Regulatory Utility Commissioners, convened in its November 2007 Annual Convention in Anaheim, California, recognizes that there is a need for a national policy permitting the direct assignment of numbering resources to VoIP and IP-enabled service providers to ensure that these providers comply with FCC numbering rules, as well as reporting and utilization requirements; *and be it further*

RESOLVED, That NARUC urges the FCC to modify or reinterpret its Part 52 numbering rules to allow interconnected VoIP providers to obtain numbering resources directly from the NANPA and the PA and to obtain service-provider access to the NPAC; *and be it further*

RESOLVED, That NARUC urges the FCC to impose equally on all entities obtaining numbering resources directly from the NANPA or the PA the applicable numbering obligations to comply with the Commissions Part 52 rules and requirements. These obligations include, but are not limited to requirements such as periodic reporting on the usage of numbering resources, and utilization and months-to-exhaust standards for obtaining new numbering resources; *and be it further*

RESOLVED, That NARUC directs its General Counsel to communicate this resolution to all relevant policymakers, including federal and State agencies and Congress, and to file whatever comments or petitions may be necessary and proper to advance the goals of this resolution.

Sponsored by the Committee on Telecommunications

Recommended by the NARUC Board of Directors, November 13, 2007

Adopted by the Committee of the Whole, November 14, 2007

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Associations' Comments was served this 24th day of March 2008, by electronic filing and e-mail to the persons listed below.

By: /s/ James B. Ramsay

The following parties were served:

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