

Federal Communications Commission
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By U.S. Mail and Facsimile

Louise E. Rickard
Acting Executive Secretary
Connecticut Department of Public Utility Control
10 Franklin Square
New Britain, Connecticut 06051

Re: Petition of the Connecticut Department of Public Utility Control for
Authority to Conduct a Voluntary Unassigned Number Porting Trial

Dear Secretary Rickard:

This letter addresses the petition of the Connecticut Department of Public Utility Control (Connecticut Commission) to conduct a voluntary unassigned number porting (UNP) trial.¹ The Connecticut Commission believes that, given the Federal Communications Commission's (FCC) willingness to allow voluntary UNP,² a more structured trial should be conducted.³ The Connecticut Commission reasons that such a trial would provide the FCC with useful information concerning the feasibility of UNP on a national level.⁴ In addition, the Connecticut Commission explains that industry participants in the state have requested that the Connecticut Commission conduct a UNP trial.⁵ The FCC's Common Carrier Bureau agrees that a UNP trial would provide valuable information as to the feasibility of implementing mandatory national UNP and supports the Connecticut Commission in conducting a voluntary UNP trial, as an initial step.

The only data that the FCC has regarding the feasibility of UNP comes from a UNP trial conducted between MCI WorldCom, Inc. (WorldCom) and Focal Communications Corporation

¹ *Petition of the Connecticut Department of Public Utility Control for Authority to Conduct a Voluntary Unassigned Number Porting Trial*, filed August 14, 2000 (Connecticut Commission Petition).

² *See Numbering Resource Optimization*, First Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574, 7677 (rel. Mar. 31, 2000) (*Numbering Resource Optimization First Report and Order*).

³ Connecticut Commission Petition at 2.

⁴ Connecticut Commission Petition at 2.

⁵ Connecticut Commission Petition at 4.

(Focal).⁶ In a letter to the FCC, dated March 27, 2000, WorldCom and Focal urged the FCC to require carriers to respond to UNP requests when: (1) a service provider's customer wants a specific number or numbers belonging to another service provider; or (2) when a service provider needs to establish a footprint within a particular area.⁷ In addition, WorldCom and Focal presented details concerning their UNP trial in a report attached to the *March 2000 Letter*.⁸ The report concluded that the UNP trial was successful because customers received the specific numbers they had requested and service providers were able to establish a footprint presence within a particular rate center.⁹ UNP uses the underlying local number portability architecture and the trial results showed that the integrity of the network was not compromised.

In the *Numbering Resource Optimization First Report and Order*, the FCC recognized that UNP was not sufficiently developed for adoption as a nationwide numbering resource optimization measure, and, thus, decided not to mandate UNP at that time.¹⁰ The FCC also expressed concern about the impact that UNP may have on (1) carriers' ability to control their own number inventories and forecast future numbering needs; and (2) companies' switching systems as well as the mapping logic of their Operations Support Systems, if the measure resulted in significant number porting.¹¹ More importantly, however, the FCC encouraged carriers to voluntarily engage in UNP where it was mutually agreeable and where no public safety or network reliability concerns had been identified. The FCC also encouraged states to continue studying UNP and forward their recommendations to the FCC by January 1, 2001.¹²

A voluntary UNP trial is an important step in exploring the feasibility of UNP as a viable number conservation measure. Numbering resource optimization strategies in the United States have been built on a strong federal-state joint partnership, and we plan to continue to use this model and use the unique expertise of the states to optimize further the domestic use of numbering resources. We, thus, strongly encourage and endorse this UNP trial just as the FCC encouraged and endorsed the initial thousands-block number pooling trial conducted in Illinois.¹³ Like thousands-block number pooling trials, a UNP trial would provide the FCC with valuable data to help determine UNP's likelihood of success as a national numbering resource optimization measure. Further, a UNP trial will allow the FCC to determine whether UNP should be used to complement other numbering resource optimization measures such as thousands-block number pooling.

⁶ See Letter from Mary De Luca, MCI WorldCom, Inc., to Magalie R. Salas, FCC, dated March 27, 2000 (*March 2000 Letter*).

⁷ *Id.* at 1.

⁸ See Report on Unassigned Number Porting (UNP) Trial, prepared by Focal and WorldCom, at 2.

⁹ *Id.* at 9.

¹⁰ *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7677.

¹¹ *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7677.

¹² *Numbering Resource Optimization First Report and Order*, 15 FCC Rcd at 7677.

¹³ See *Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717*, Memorandum Opinion and Order and Order on Reconsideration, 13 FCC Rcd 19009, 19027 (rel. Sept. 28, 1998).

To facilitate the FCC in assessing the feasibility of UNP as a national numbering resource optimization strategy, we request that the Connecticut Commission provide to the Common Carrier Bureau as much of the following feedback as feasible:

A. Before Implementation of the UNP Trial – Initial Report

- (1) Describe the purposes for which UNP will be permissible (e.g., specific customer requests for a particular number(s); establishing carrier footprints with small quantities of numbers; inventory building; inventory reduction), and what a carrier must demonstrate in each instance (e.g., proof of a customer contract).
- (2) Describe how UNP will be administered (e.g., through a central administrator; through carrier-to-carrier administration). If carrier-to-carrier, what “rules” will apply (e.g., to prevent inadvertent ports or ports made in error)?
- (3) Specify the procedures to be followed by all parties (e.g., porting carrier, ported-to carrier, administrator, if applicable) involved in the transaction (e.g., who initiates the request for a port; who verifies that the requested port is permissible and meets the qualifying criteria).
- (4) Will audits be performed to ensure compliance with established procedures? If yes, what type of audits will be conducted (e.g., random audits) and who will conduct such audits?
- (5) Describe the dispute resolution procedures between carriers for inadvertent ports or ports made in error.
- (6) Describe any limitations on porting (within certain rate centers only or state-wide; the amount of numbers that may be ported per request; whether a carrier may deny another carrier’s request for numbers under certain circumstances and a description of those circumstances).
- (7) Describe which carrier(s) will cover the cost of porting, and if that coverage will differ depending on the purpose for which a port is sought. Describe any plans to permit carrier cost recovery.
- (8) Describe any carrier reporting requirements (e.g., will carriers donating and receiving ported numbers be required to supplement their Numbering Resource Utilization and Forecasting (NRUF) reporting whenever a port takes place, or periodically -- e.g., either every 6 months with their scheduled NRUF report submissions or at some other interval). Will carriers be permitted to aggregate and report ported numbers at the rate center level or at the NPA level, and will the reporting level depend on the quantity of numbers being reported?

B. After Implementation of the UNP Trial – Periodic and Ongoing Reporting

- (1) How many and which carriers (by name and industry segment) are participating in UNP?
- (2) How many numbers per period (month? quarter?) have been ported? Specify the purpose for porting those numbers (e.g., to establish a footprint; to meet a particular customer request).

- (3) Have entire NXXs or thousands-blocks been returned or their need obviated as a result of small/low volume carriers being able to establish a footprint using UNP?
- (4) What are carriers' actual and average costs incurred for UNP (including initial upgrade costs to facilitate UNP; ongoing per port costs).
- (5) How many reported porting errors have taken place? How were any disputes resolved, and how long did it take to do so?
- (6) What technical or network operation difficulties, if any, have been encountered? Were they due to increased porting volumes or other unforeseen circumstances?
- (7) What operational changes had to be made as a result of knowledge gained through actual experience and/or trial-and-error?
- (8) If carrier audits were performed, provide a summary of the results of those audits.

In conducting the UNP trial, the Connecticut Commission must adhere to the same safeguards and conditions that apply to the implementation of other number conservation measures, including the FCC's policy that such measures are not a substitute for area code relief.¹⁴ The UNP trial must also comply with all other FCC rules and regulations regarding number administration. Finally, we encourage carriers participating in this UNP trial to assist the Connecticut Commission by providing requested data so we can properly assess the feasibility of UNP in the largest Metropolitan Statistical Areas or on a nationwide basis.

We believe that the Connecticut Commission's voluntary UNP trial will provide the FCC with the information needed to determine whether UNP could be used, in the long run, on a nationwide basis to optimize further the use of numbering resources in the United States. The trial will also help the FCC to determine whether the benefits of UNP outweigh the costs. We applaud the Connecticut Commission's initiative to conduct this voluntary UNP trial in Connecticut and look forward to working with the Connecticut Commission on this matter.

Sincerely,

Dorothy T. Attwood
Chief, Common Carrier Bureau

¹⁴ See, e.g., *Numbering Resource Optimization*, Order, 15 FCC Rcd 23371 at paras. 10, 11, 13-22 (rel. July 20, 2000).