



Public Service Commission of the District of Columbia  
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November 2, 2009

Sharon E. Gillett  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: Recommendation of the North American Numbering Council

Dear Chief Gillett:

As Chairman of the North American Numbering Council ("NANC"), I am hereby submitting the recommendations of the NANC regarding certain aspects of the implementation of the Federal Communications Commission's Order No. 09-41 (*Local Number Portability Porting Interval and Validation Requirements; Telephone Number Portability*, WC Docket No. 07-244, CC Docket No. 95-116, Report and Order and Further Notice of Proposed Rulemaking (FNPRM), FCC 09-41 (2009) ("*2009 LNP Porting Intervals Order*"). I am also submitting a recommendation supported by the majority of NANC members but which due to time constraints was not able to be adopted at a publicly-noticed meeting of the full NANC. Finally, in accordance with NANC guidelines on consensus, I am also submitting several Minority Reports on specific sections of this submittal.

In Paragraph 1 of the *2009 LNP Porting Intervals Order*, the Commission ruled, "In this Report and Order... we reduce the porting interval for simple wireline and simple intermodal port requests. Specifically, we require all entities subject to our local number portability (LNP) rules to complete simple wireline-to-wireline and simple intermodal port requests within one business day."

In Paragraph 10 of the *2009 LNP Porting Intervals Order* the Commission ruled specifically in regard to its directive to the NANC. We leave it to the industry to work through the mechanics of this new interval. In particular, we direct the NANC to develop new LNP provisioning process flows that take into account this shortened interval.

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"In developing these flows, the NANC must address how a "business day" should be construed for purposes of the porting interval, and generally how the porting time should be measured. The NANC must submit these flows to the Commission no later than 90 days after the effective date of this Order."

The *2009 LNP Porting Intervals Order* was adopted and released on May 13, 2009 and was effective on August 3, 2009. Immediately thereafter, the NANC commenced to address the Commission's directive in Paragraph 10 through the Local Number Portability Administration (LNPA) Working Group. In addition to carrying out this directive, the LNPA Working Group was tasked by the former NANC Chairman to consider making recommendations on other issues raised in the related FNPRM which are relevant to the implementation of one-business-day simple porting. These issues are the subject of the FNPRM but were not included in the specific directive to the NANC.

The extensive collaborative process used by the LNPA Working Group to formulate its recommendations to the NANC is described in Sections 2 and 5 of the "Recommended Plan for Implementation of FCC Order 09-41" (Attachment 1).

The recommendations of the LNPA were fully considered at the public meeting of the full NANC on October 15, 2009. The attached report presents those recommendations of the LNPA Working Group, with revisions as agreed to at the meeting, on which I determined that consensus had been reached. Minority views on the LNPA Working Group's report submitted by COMPTTEL and XO Communications on Section 3.1, regarding the time intervals when a simple port is determined to be non-simple, (Attachment 2) and by Windstream on Section 3.2 and Section 3.5.3, regarding passcodes and Customer Service Request (CSR) information, (Attachment 3) are attached.

Consensus was not reached at the NANC's October 15<sup>th</sup> meeting on the recommendations of the LNPA Working Group in the report's original Section 3.5.1 in regard to the issue raised in the FNPRM on the data fields to be used in a Local Service Request (LSR). The LNPA Working Group recommended increasing the number of required LSR data fields to 21 and establishing up to 80 additional conditional or optional LSR data fields. There was, however, unanimous agreement by the NANC that some number greater than the four LSR data fields currently mandated by FCC was needed to implement the shortened porting interval and that the LSR data fields should be standardized for all service providers.

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Following the October 15<sup>th</sup> meeting of the NANC, the members of the LNPA Working Group and the Order and Billing Forum and other NANC members worked diligently through conference calls, emails and meetings to revise the recommendation regarding LSR data fields. A revised recommendation was submitted to me on October 26<sup>th</sup> and circulated to the full NANC with a request for comments by close of business on October 28<sup>th</sup>. Most NANC members communicated strong support for the revised Section 3.5.1 recommendation. However, because time did not permit public notice in the Federal Register for a full NANC in-person or telephonic meeting at which the revised Section 3.5.1 recommendation could be discussed and consensus publicly determined before the due date for submittal to the Commission on November 2<sup>nd</sup>, I am including this revised recommendation as a separate section with this submittal (Attachment 4). I am also submitting a Minority Report on the LNPA Working Group's revised Section 3.5.1 recommendation from Cox Communications and Comcast Corporation (Attachment 5) and a Minority Report communication from the National Cable Television Association (Attachment 6).

In conclusion, I want to publicly thank the members of the LNPA Working Group, the members of the numerous sub-groups, and the members of the full NANC for all of their work on these matters over the last five months. I want to again publicly thank all of the industry, State and consumer representatives on the NANC and in the various Working Groups who have devoted their valuable time and effort to crafting these recommendations and viewpoints. As a voluntary body, the NANC is a model of cooperative input into government decision-making that the FCC can be proud of. I look forward to working with the Commission and the NANC members to make our deliberations even more transparent and inclusive.

Please feel free to contact me if you have any questions or wish to discuss this submittal further.

Sincerely,

A handwritten signature in black ink, appearing to read "Betty Ann Kane". The signature is fluid and cursive, with a large initial "B" and "K".

Betty Ann Kane  
Chairman, North American Numbering Council  
and Chairman, DC Public Service Commission

Attachments