

Recommendation of the FCC Disability Advisory Committee  
Adopted December 6, 2016

1. WHEREAS, hearing individuals are free to choose to use either wireline and wireless systems and equipment, or both;
2. WHEREAS, ports between wireless numbers are often completed the same day;
3. WHEREAS, users of IP-enabled telecommunications relay services have fewer options for telecommunications access and never experience a port in the same day;
4. WHEREAS, the Disability Advisory Committee (“Committee”) recognizes that functional equivalency must be provided to users of IP-enabled relay services;
5. WHEREAS, functional equivalency in the porting context is only achieved when the amount of time it takes for a user of IP-enabled relay service to port their number to another provider does not exceed what is encountered for hearing individuals;
6. WHEREAS, manual processes are inherent to delays;
7. WHEREAS, the vast majority of the delay encountered in porting is experienced after the Letter of Authorization (LOA) is supplied by the winning provider to the third party numbering provider;

NOW, THEREFORE, IT IS --

8. RECOMMENDED, that the Disability Rights Office (“DRO”) and the Consumer and Governmental Affairs Bureau (“CGB”) share information regarding the porting experience for users of IP-enabled relay services with the Wireline Competition Bureau (“WCB”) and the North American Numbering Council (“NANC”) so that the WCB and NANC can identify solutions to shorten the process of porting a telephone number from one IP-enabled relay provider to another to that which is experienced by hearing individuals;
9. RECOMMENDED further, that standardized and automated methods be used to verify the information on a LOA including whether the numbers being ported are owned by the party initiating the port through the LOA;
10. RECOMMENDED further, that the FCC consider any recommendations from NANC and WCB regarding improvements to the porting process;
11. RECOMMENDED further, that the FCC conduct as part of the National Outreach Campaign (“NOC”), a campaign to educate relay users about the porting process, including, but not limited to, information regarding the average length of the porting process, the common causes for delays in the porting processes, and expectations for

porting features and/or equipment from one provider to another, and how to reach 911 while a port is pending;

12. RECOMMENDED further, that FCC require providers of IP-enabled relay services who are winning providers in a porting process to furnish to acquired customers information regarding the features they provide to users, in accordance with a format developed by the FCC that includes features and functions known to exist among IP-enabled relay providers, including but not limited to the ability to receive video mail, the ability to set a video greeting, the ability to set a text-based greeting, the ability to support low-vision customers with high-contrast display modes and/or Braille displays, how to access 911 services including the need to provide location information to the winning provider, and the ability to support systems to provide visual notifications of incoming calls.