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October 30, 2009

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VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 07-244; CC Docket No. 95-116
Ex Parte Presentation

Dear Ms. Dortch:

On October 29, 2009, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) Ordering and Billing Forum (OBF) met with representatives from the Wireline Competition Bureau (WCB). The purpose of this meeting was to discuss issues pertaining to number portability, including the ATIS OBF's recommendation to the North American Numbering Council (NANC) regarding the standardization of the porting process and the reduction in the number of fields required for simple ports.

ATIS noted that the OBF recommendation, which is attached to this letter, was agreed to unanimously by all members participating in the OBF's Local Service Ordering and Provisioning and Wireless Committees, as well as by the OBF Intermodal Subcommittee. The recommendation is also supported by the NANC Local Number Portability Working Group and is currently under expedited consideration by the NANC.

The following representatives from the WCB were present at the meeting: William Dever, Acting Chief, Competition Policy Division; Ann Stevens, Deputy Chief, Competition Policy Division; Michelle Sclater, Attorney Advisor; Melissa Droller Kirkel, Attorney Advisor; and Marilyn Jones, Attorney Advisor.

Attending on behalf of the ATIS OBF were: Linda Peterman, Industry Relations Manager, One Communications; Sharon Weldon, Senior Principal, TEOCO Corporation; Deborah Tucker, Manager - LNP Projects and Operations, Verizon Wireless; Alissa Medley, Manager, ATIS; Yvonne Reigle, Director, ATIS; Maria Estefania, Vice President of Standards Development, ATIS; Deirdre Cheek, Attorney, ATIS; and Thomas Goode, General Counsel, ATIS.

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Pursuant to Section 1.1206(b)(2) of the Commission's rules, one copy of this letter is being filed electronically for inclusion in the public record of the above-referenced proceedings.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas Goode".

Thomas Goode
General Counsel

Attachments



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Gary Sacra, LNPA WG Co-Chair, gary.m.sacra@verizon.com
Paula Jordan, LNPA WG Co-Chair, Paula.Jordan@T-Mobile.com

October 23, 2009

Dear Gary and Paula,

The prior Alliance for Telecommunications Industry Solutions' (ATIS) OBF LSOG field submission to the LNPA WG, which was included in the LNPA WG implementation recommendation, identified 21 fields required to submit either a simple or non-simple port, at the request of the industry. Based on the discussions during the October 15 NANC meeting, the OBF has revised its recommendation. The new recommendation includes the 14 fields required for the submission of simple ports only.

Attached, please find a replacement for section 3.5.1 of the LNPA WG FCC 09-041 implementation plan, including the spreadsheet with only the required fields and related assumptions for simple ports, as well as a spreadsheet listing the participants in this effort. Therefore, as noted in the replacement section, 3.5.1, the OBF requests that the use of the most current LSOG as it relates to number portability (REQTYP "C") and WICIS, both as maintained by ATIS/OBF, should be required by the FCC.

The OBF requests that you submit this amended information to the NANC and propose inclusion in the recommendation to be submitted to the FCC by October 31, 2009. If this section implementing the LSR/FOC process (as represented in NANC flow figures 2, 4 and 5) is not included in the NANC implementation plan, the resulting non-standard environment will make it impossible for a one day port process with a four hour FOC/response interval to be consistently implemented across the Industry.

The OBF believes that it is important for the NANC to be made aware of the following important points with regard to the OBF's work on this matter:

- As explained more fully in the attached spread sheet of participating companies, the above consensus was reached unanimously by the OBF. The consensus is supported by wireless and wireline carriers providing service to the vast majority of the US population.
- While the OBF unanimously supports this recommendation, the industry recognizes that the reduction in the number of identified required fields from 21 to 14 may increase the risks of incorrect or inaccurate porting. The OBF does not believe that any further reduction in the number of fields is possible.

ATIS and its OBF greatly appreciate all of the efforts the LNPA WG has made with the implementation plan as well as their cooperation with the OBF.

Sincerely,

Linda Peterman
One Communications
OBF Intermodal Subcommittee Co-Chair

Syed Mubeen Saifullah
NeuStar
OBF Intermodal Subcommittee Co-Chair

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NORTH AMERICAN NUMBERING COUNCIL (NANC) LOCAL NUMBER PORTABILITY ADMINISTRATION WORKING GROUP (LNPA WG) RECOMMENDED PLAN FOR IMPLEMENTATION OF FCC ORDER 09-41

3.5.1. Standard Local Service Request (LSR) Data Fields

FCC 09-41 tasked the North American Numbering Council (NANC) with amending the NANC LNP process flows to address the one-day porting interval for Simple Ports. Incorporated within those flows is the Ordering and Billing Forum (OBF) Local Service Request (LSR)/Firm Order Confirmation (FOC) process (NANC flow figures 2, 4 and 5). As a result, the Local Number Portability Administration Working Group (LNPA WG) requested that the OBF make the necessary changes to the Local Service Ordering Guidelines (LSOG) and the Wireless Inter-carrier Communication Interface Specifications (WICIS) documentation/processes to address one-day porting.

Both the LNPA WG and the OBF determined that standard implementation of the LSOG and WICIS were necessary in order to consistently achieve one-day porting across the industry. As a result of this determination, the OBF has agreed to changes in the LSOG and WICIS to implement standard data exchange for both Wireline-to-Wireline and Intermodal Simple Ports. Prior to this standardization effort, the number of fields necessary to accomplish a port varied significantly on a per carrier basis, from 12 to 30 or more fields. In addition, any number of specific company proprietary fields could be required. As a result of this standardization effort, the industry has agreed upon a standard process along with a standard set of 14 fields required to accomplish a Simple Port in today's environment, as outlined below.



Combined_REQTYPC
_data-elements_final

Combined_REQTYPC_data-elements_final.xls

Although not "Required" for all Simple Ports, certain Simple Port requests may necessitate the exchange of specific data elements identified as "Conditional" in the LSOG to accomplish the port. Such fields would be necessary only when specific criteria are met, some examples of which follow:

SUP – The Supplement field is necessary to cancel, change the due date or change data values on a subsequent order and identifies the reason the change is being issued.

ONSP – The Old Network Service Provider field is necessary for Intermodal porting (wireless-to-wireline only) for delivery of the request by a service bureau to the appropriate provider. The field is not required when porting from wireline-to-wireline or for Intermodal porting from wireline-to-wireless.

**NORTH AMERICAN NUMBERING COUNCIL (NANC)
LOCAL NUMBER PORTABILITY ADMINISTRATION
WORKING GROUP (LNPA WG) RECOMMENDED PLAN
FOR IMPLEMENTATION OF FCC ORDER 09-41**

EUMI – The End User Migration Indicator field is necessary for wireline-to-wireline number port(s), when the end user is moving at the same time as the port, to drive the appropriate E911 activity based on the NENA standard. For ports without a move, the Old Service Provider performs an “Unlock” and the New Service Provider performs a “Migrate” and “Lock”. For ports involving a move, the Old Service Provider performs a “Disconnect/Remove” and the New Service Provider performs a “New/Install” to ensure an incorrect address is not listed in the E-911 database.

Fields identified in the LSOG as “Optional” may be utilized by the New Service Provider to provide additional information relative to a port; however, they may not be “Required” under any circumstances (excluding the Personal Identifier (PID) field, which may be required for end user validation purposes based on FCC 07-188, only when such password is requested and assigned by the end user) and will not be edited for other than the appropriate data characteristics (e.g. 10 character alphanumeric, 5 character numeric, 17 character alphabetical) and any field specific Valid Values.

In order to consistently implement one-day porting for simple ports and the 4-hour LSR-FOC timeline agreed upon by the NANC on an ongoing basis, use of the most current LSOG as it relates to number portability (REQTYP “C”) and WICIS, both as maintained by the Alliance for Telecommunications Industry Solutions (ATIS)/OBF, should be required by the FCC. It is the consensus of the industry that, without such specific requirement, consistent implementation and/or accomplishment of one-day porting for Simple Ports will not be possible and end user telephone services will be jeopardized.

The attached spreadsheet contains the list of companies at the OBF that actively worked on and unanimously approved the attached recommendation for inclusion in the LNPA WG’s FCC-09-41 Implementation Plan. Also included in the spreadsheet is the list of companies that participated in the September 1, 2009 LNPA WG meeting where consensus was reached to include the OBF’s recommended list of required LSR data elements in the LNPA WG’s Implementation Plan. As the LNPA WG minutes to that meeting reflect, Comcast and Cox were the two companies that raised objections.



OBF and LNPA WG
Participating Companies

Industry wide standard implementation of these amended practices is contingent upon a mandate from the FCC. Without such mandate, implementation is at the discretion of the companies involved.

The Simple Port Service Request (SPSR) will no longer be supported. A decision was made to consolidate all number portability only ordering under REQTYT=C.

For those fields that are optional in the LSOG for REQTYT=C, all companies will accept the fields where the data provided will not be used for processing. If the data is sent, the data must conform to the LSOG data characteristics and Valid Entries. Content in fields without specific Valid Entries will not be validated.

Directory listings must be retained or deleted for orders involving directory listings in order to be considered for simple port processing. Orders involving change(s) to directory listing(s) will not be considered for simple port processing. The Directory Listing (DL) form is not permitted for a simple port.

Service currently provided via interim number portability is not eligible for simple port processing.

The SUP would require a full refresh of the original request. All necessary fields need to be re-sent.

If an error is being returned for those fields required on the LSR, EU and NP forms, it is understood that any missing data can not be returned on the response if not provided on the request.

If the industry requires a 4 hour response for all orders submitted with a 1 to 2 day due date, either an FOC or a standard error message will be returned for those orders which fall outside of simple port parameters (Not a simple port - send supplement).

The LSOG standard REQTYT "C" LSR, EU, NP and LR(s) will be utilized by all parties (wireline and wireless, wholesale and retail) across the industry, for wireline-to-wireline and bi-directional intermodal porting.

Wireless-to-Wireless porting will continue to be accomplished utilizing the WICIS documentation and processes.

For manual ordering, the LSOG industry standard LSR, EU, NP and LR form templates are available for use when ordering REQTYT=C (Number Portability) only. When any other form (e.g. HGI or DL) is required, the company proprietary LSR, EU, NP and LR must be used instead of the LSOG industry standard form template.

Industry standard ordering templates will be available via the LSR, EU, NP and LR practices of the ATIS/OBF LSOG.

No logo will be permitted on the LSOG industry standard LSR, EU, NP and LR form templates for REQTYT=C.

ATIS will provide the LSR, EU, NP and LR practices to the industry at no charge as a result of the FCC mandate.

Industry wide standard implementation of these amended practices is contingent upon a mandate from the FCC. Without such mandate, implementation is at the discretion of the companies involved.

STANDARDIZED REQ TYP C SUMMARY

The LSOP Committee addressed the industry's request based on the LSR process which provides a variety of processing options dependent upon the request being submitted. Since the LSR Process is not number portability specific, fields that are identified as optional, conditional, prohibited or required vary based on the desired product and the customer's request.

Fields identified as optional or conditional may be necessary to accomplish an individual providers' request. For example; if the provider chooses to send a subsequent version of a request, the SUP and VER fields would be required.

This document identifies the pieces of data that may be sent to port a telephone number using the LSR Process (REQ TYP "C").

Field Name	Definition	Standard Data Set for "Number Portability Only" (Req Type C) R = Required C = Conditional O = Optional	Justification	Applicable Form	V = Validated P = Provisioning N = Non-Simple M/P = Manual Provisioning
CCNA	Customer Carrier Name Abbreviation - Identifies the COMMON LANGUAGE IAC code for the customer.	R	-Required to initiate automated port request in combination with other carrier credential information (i.e. CC, NNSP). -Required to meet the state specific order flow through metrics/benchmarks.		
PON	Purchase Order Number - Identifies the customer's unique purchase order or requisition number that authorizes the issuance of this request or supplement.	R	In combination with the VER field: -Required for carriers to track the ongoing progress of the request. -The carrier's ability to provide order status to the end user or to make changes to the original request would be compromised without this field.	LSR Form	P
AN	Account Number - Identifies an account number assigned by the current Network Service Provider that may or may not be dialable.	R	-Required for the current service provider to properly discontinue end user billing. -Required to identify the billing number in the current service provider's database, which may not be the same as the ported number.	LSR Form	P
DDD	Desired Due Date - Identifies the customers desired due date.	R	-Required to identify the end user's requested porting due date, which allows for the coordination of the porting process, eliminating potential end user out of service conditions. -Required to differentiate between simple and non-simple ports -Required to determine the appropriate order intervals, such as FOC, reject, NPAC timers, etc. -Required to determine end user effective billing date(s).	LSR Form	V P
				LSR Form	

REQTYP	Requisition Type and Status - The first character of REQTYPE specifies the type of service. The second character of REQTYPE specifies a firm order.	R	In combination with the ACT field: -Required to determine the type of order to be processed (e.g. REQTYPE "C" ACT of "V" is porting). -Required for the carrier receiving the request to initiate accurate editing and provisioning processes. -Required to drive the execution of the appropriate mapping or schema.	LSR Form	P
ACT	Activity - Identifies the activity involved in this service request.	R	In combination with the REQTYPE field: -Required to determine the type of order to be processed (e.g. REQTYPE "C" ACT of "V" is porting). -Required for the carrier receiving the request to initiate accurate editing and provisioning processes. -Required to drive the execution of the appropriate mapping or schema.	LSR Form	P
CC	Company Code - Identifies the exchange carrier initiating the transaction.	R	-Required to initiate automated port request in combination with other carrier credential information (i.e. CCNA, NNSP). -Required to meet the state specific order flow through metrics/benchmarks.	LSR Form	P
NNSP	New Network Service Provider - Identifies the Number Portability Administration Center (NPAC) Service Provider Identifier (SPI) of the new Network Service Provider (NSP).	R	-Required to drive the creation of, or concurrence with, the subscription version transaction and associated timers in NPAC by the Old Network Service Provider. -This information is the new network service provider NPAC SPID, which can be different from the CC and CCNA fields. -Required to demonstrate the submitting provider is acting as an end user's agent and has authorization on file to do so.	LSR Form	P
AGAATH	Agency Authorization Status - Indicates that the customer is acting as an end user's agent and has authorization on file.	R	-Required to determine Enhanced (E) 9-1-1 data base record activity requirements (e.g. need to unlock and migrate the (E) 9-1-1 record, need to transition to wireless (E) 9-1-1). -Required to allow the company receiving the request to derive information versus manual population minimizing required fields. -Required for determination of intermodal port and associated edits	LSR Form	P
NPDI	Number Portability Direction Indicator - Identifies the direction of LNP conversion activity and the Enhanced (E) 9-1-1 data base record activity requirements for this request.	R		LSR Form	P

<p>TEL NO (INIT) Telephone Number - This appearance of TEL NO is for the initiator.</p>	<p>R</p>	<p>-Required to facilitate potential clarification of an order in lieu of rejection, to avoid extending the end user's interval, wherever possible. -Required to address order clarifications where no prior relationship exists between the submitting and receiving carriers and contact information is not available elsewhere. -Required to allow for prompt discrepancy resolution, where feasible, in the shortened interval mandated by FCC 09-41. Without this information on the form, the need to find contact information elsewhere may lead to additional rejects or extend the porting interval.</p>	<p>LSR Form</p>	<p>P</p>
<p>ZIP (END USER) Zip Code - This instance of the ZIP CODE field is used for the service address.</p>	<p>R</p>	<p>-Required to validate that the correct end user's telephone number has been sent on the request.</p>	<p>EU Form</p>	<p>V</p>
<p>PORTED NBR Ported Telephone Number - Identifies the Telephone Number (TN) or consecutive range of TNs residing in the same switch to be ported.</p>	<p>R</p>	<p>-Required to identify the end user telephone number to be ported.</p>	<p>NP Form</p>	<p>V</p>
<p>VER Version - Identifies the customer's version number.</p>	<p>R</p>	<p>In combination with the PON field: -Required for carriers to track the ongoing progress of the request. -The carrier's ability to provide order status to the end user or to make changes to the original request would be compromised without this field.</p>	<p>LSR Form</p>	<p>P</p>

ATIS OBF has 42 member companies and of those member companies, the following list of participants actively worked on and unanimously approved the attached recommendation for inclusion in the LNPA WG's FCC-09-41 Implementation Plan.

At its September 1, 2009 meeting, the LNPA WG reached consensus to include the OBF's recommended list of required data fields in its Implementation Plan recommendation to NANC. The following companies participated during that meeting. As the LNPA WG minutes to that meeting reflect, Comcast and Cox were the two companies that raised objections.

OBF Participating Companies

AT&T
Bell Canada
Cellular One
Creative Support Solutions
DSET
Embarq/CenturyLink
FairPoint
Idearc Media
NeuStar
One Communications
Qwest
Sprint
Syniverse
Telcordia
Teoco
T-Mobile
Transaction Network Services
US Cellular
Verizon

LNPA WG Participating Companies

AT&T
Brighthouse Networks
Canadian LNP Consortium
CenturyLink
Comcast
Covad
Cox
DER Consulting
GVNW
Integra
John Staurulakis, Inc.
Level 3
NetNumber
NeuStar
One Communications
Qwest
RCN
Socket
Sprint Nextel
Syniverse
Telcordia
T-Mobile
TNS
Townes Telecommunications
US Cellular
Verizon
Vonage
XO Communications