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September 6, 2007

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The Honorable Daniel K. Inouye
Chairman, Committee on Commerce, Science and Transportation
United States Senate
777 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Ted Stevens
Vice Chairman, Committee on Commerce, Science and Transportation
United States Senate
522 Hart Senate Office Building
Washington, D.C. 20510

Re: Alliance for Telecommunications Industry Solutions'
Work to Address Challenges Surrounding Number Porting

Dear Senators Inouye and Stevens:

The Alliance for Telecommunications Industry Solutions (ATIS) respectfully submits these comments in response to issues raised during the July 12, 2007, Senate Committee on Commerce, Science and Transportation hearing to address number portability issues and to discuss S.1769, the Same Number Act of 2007. As the main industry organization working on number portability and other issues essential to the operation and continual evolution of the communications industry, ATIS wants to provide further information regarding the industry's effort to find solutions to the challenges and technical complexities surrounding number porting.

Background. ATIS is a technical planning and standards development organization accredited by the American National Standards Institute (ANSI) and committed to rapidly developing and promoting technical and operational standards for communications and related information technologies worldwide using a pragmatic, flexible and open approach. The ATIS membership spans all segments of the industry, including local exchange carriers, interexchange carriers, wireless equipment manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, providers of commercial mobile radio services, broadband providers, software developers, consumer electronics vendors, digital rights management companies, central authentication service companies and internet service providers. Industry professionals from more than 300 communications companies actively participate in ATIS' open industry committees and other forums.

Standards that Drive the Business of Communications

The ATIS Ordering and Billing Forum (OBF) is an open telecommunications industry forum that identifies, discusses and resolves national issues affecting the ordering, billing, provisioning and exchange of information about access services, connectivity and related matters. The ATIS OBF has several committees that work on and resolve, among other things, issues related to number porting. The Local Service Ordering and Provisioning (LSOP) Committee of the OBF examines the business processes and documentation management issues associated with local service ordering and provisioning. The LSOP's Local Service Migration Subcommittee identifies and recommends resolutions for ordering, billing, and information exchange issues related to the migration of local service between wireless and wireline carriers. Another ATIS OBF standing committee, the Wireless Committee, identifies and resolves technical and operational issues related to wireless communication interfaces and associated processes. The Wireless and LSOP Committees also work together to address issues that impact both segments of the industry as they relate to local number portability.

The ATIS OBF is the developer of the industry guidelines pertaining to wireline-to-wireline, wireless-to-wireless and intermodal (wireline to/from wireless) porting. The industry guidelines are developed using ATIS' open, equitable and consensus-based processes and are constantly updated to address new issues and to reflect the changing nature of the communications industry. Highlighted below are the key guidelines developed by ATIS OBF and its committees to address number porting.

- ATIS Local Service Migration Guidelines (LSMG). One of the national guidelines developed by the OBF is the Local Service Migration Guidelines (LSMG) (ATIS-0405300-0003), which establish general business rules and procedures governing the migration of end users between local service providers (LSPs) to ensure that end users can migrate their local service from one LSP to another. The document focuses on wireline voice service migrations and data service migrations (including voice/data combinations) as well as on intermodal (wireless and wireline) voice service migrations. The guidelines note that service migration should occur in a seamless and timely fashion. The LSOP Committee periodically updates these guidelines, which are publicly available for free, to address additional migration scenarios.
- ATIS Local Service Ordering Guidelines (LSOG). The Local Service Ordering Guidelines (LSOG) contain ordering forms and descriptions of valid data entries that are required for the ordering, billing, and provisioning of local telecommunications service. Included within the LSOG are the forms used in porting a telecommunications subscriber from one service provider to another. This Local Number Portability (LNP) form identifies the type of information that is necessary for the timely porting of a telephone number by a service provider.
- ATIS Wireless Intercarrier Communications Interface Specification (WICIS). The ATIS OBF has also developed guidelines to assist in wireless-to-wireless porting. The Wireless Intercarrier Communications Interface Specification (WICIS) for Local Number Portability (ATIS-0409001-0400) provides guidelines for wireless-to-wireless migrations. WICIS also

includes references to wireless interactions with a wireline provider through fields, values or processes to allow synchronization with intermodal processes and with internal company system implementation efforts.

Local Service Migration Challenges. Despite the diligent efforts of the companies participating in the ATIS OBF, challenges associated with local service migration do exist. A number of those testifying during the July 12 hearing noted these challenges and their effects on the telecommunications industry. Ted Shremp of Charter Communications, Inc. (Charter) noted that, in the course of porting transactions, Charter experienced a fallout rate of over 15%.¹ Similarly, the Honorable Tony Clark, testifying on behalf of the National Association of Regulatory Utility Commissioners, cited statistics indicating that the cancellation rate for intramodal (wireless-to-wireless) service migrations is significantly less than the rate for intermodal service migrations.²

ATIS notes that these challenges stem from the nature of service migration. Service migration is a complex process involving the integration of different processes between multiple service providers. These processes may include the disconnection of the service from the existing service provider, the ordering and billing of new service, directory listing management, long distance service carrier notification and E9-1-1 management.

Service migration is made more complex by the myriad of players in the marketplace, including wireline providers, wireless providers and resellers, each of which has different business processes. For instance, while wireline providers may use the customer's service address to port a number because they have a physical connection to their customer's telephone, an address such as this is not relevant to a wireless carrier. This difference in business processes can result in a number of porting problems.

Different providers may have different levels of familiarity with the established guidelines for number porting, and this unfamiliarity may also lead to porting problems or delays. During ATIS' work to develop intermodal service migration guidelines, it became apparent that there were misunderstandings regarding the correct use of certain porting fields and certain processes between wireless and wireline service providers. While these misunderstandings have been corrected, there remain concerns within the industry about those companies that are not familiar with the established service migration guidelines. Some small or rural companies may be less familiar with the process than larger companies that face significantly more service migration requests. In addition, resellers of wireless service may not be familiar with, or may not have direct access to, information necessary for intermodal number porting.

Even within a specific segment of the industry, there are complexities. Because wireline carriers have implemented different Operating Support Systems (OSS) and have unique business needs, these carriers have not implemented the same version of the ATIS LSOG guidelines. Carriers may also require different fields even if they are using the same version of the guidelines based on their individual business requirements.

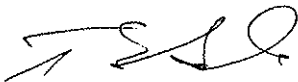
¹ Testimony of Ted Shremp, Senior Vice President of Charter Communications, Inc., at p.3.

² Testimony of the Honorable Tony Clark, Commissioner of the North Dakota Public Service Commission, at p. 3.

The Way Forward. At the most recent ATIS OBF meeting on August 14, the ATIS Wireless and LSOP committees agreed to continue discussions of possible solutions to streamline the porting process. ATIS supports the industry working through the ATIS OBF to address the challenges of intermodal porting.

Representatives from ATIS would be happy to meet with your office to discuss this matter or to answer any questions regarding ATIS' work on number portability. If you have any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Goode', written in a cursive style.

Thomas Goode
General Counsel