

Resolution Regarding Revising Guidelines for Number Porting

WHEREAS, The National Association of Regulatory Utility Commissioners (NARUC) has consistently supported Local Number Portability as a means of encouraging competition, enabling consumer choice and achieving an efficient number system; *and*

WHEREAS, Telephone number porting occurs in two stages: Confirmation and Activation. The Confirmation Interval begins with a Local Service Request (LSR) from the new carrier and ends with a Firm Order Confirmation (FOC) from the existing carrier. For ports involving wireline carriers, the allowed Confirmation Interval is 24 hours. The Activation Interval involves system updates and the physical work required to complete a simple port. For ports involving wireline carriers, the allowed Activation Interval is three business days; *and*

WHEREAS, “Simple ports” are ports that involve an account for a single line and:

- may include CLASS features such as Caller ID;
- do not involve multi-line accounts;
- do not involve unbundled network elements;
- do not involve complex switch translations such as Centrex or Plexar, ISDN, AIN services, remote call forwarding or multiple services on the loop;
- do not include a reseller; *and*

WHEREAS, The current wireline-to-wireline porting interval of four days has been in place for almost 10 years, and although processes in the industry have benefited from great technological advances, in particular the speed of service provisioning and delivery, the wireline-to-wireline porting interval remains at 4 days; *and*

WHEREAS, The implementation of electronic interfaces has made it technically feasible to complete simple ports between wireline-service providers on a next-day basis; *and*

WHEREAS, Porting between wireless service providers is accomplished within two-and-one-half hours using the same industry database that is used for wireline porting; *and*

WHEREAS, The North American Numbering Council has established a Local Number Portability Working Group (LNPA WG), and the LNPA WG has before it a Problem Identification Management (PIM) to reduce the porting interval to a next-day basis for simple ports accomplished through an electronic interface; *and*

WHEREAS, The FCC has before it a petition to minimize the criteria used to validate a Local Service Request (LSR), thereby enabling a reduction in the Confirmation Interval, and thus the overall porting interval; *and*

WHEREAS, A large number of service providers refuse to consistently comply with the FOC and activation periods for the existing wireline porting interval; *and*

WHEREAS, Service providers are competitively disadvantaged and consumers are inconvenienced when not permitted to promptly transfer existing numbers to competing service providers; *now, therefore, be it*

RESOLVED, That the National Association of Regulatory Utility Commissioners, convened in its November 2007 Annual Convention in Anaheim, California, directs the General Counsel of NARUC to pursue, by the best means available, changes in the FCC rules and orders: (1) to establish a one business-day interval for simple ports that are requested by electronic interface, or a longer period if wireline carriers individually demonstrate that they cannot accomplish reliable ports within that limit, after they have made all reasonable cost-effective efforts to upgrade electronic systems; and (2) that any such rules and orders require fair and equitable enforcement of all requirements on all of the porting service providers.

Sponsored by the Committees on Telecommunications and Consumer Affairs

Recommended by the NARUC Board of Directors, November 13, 2007

Adopted by the Committee of the Whole, November 14, 2007