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000121A-TP

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Subject: Electronic Filing - Docket No. 000121A
Attachments: 20091124173953307.pdf

Attached is an electronic filing for the docket referenced below. If you have any questions, please contact either Matt Feil or Nicki Garcia at the numbers below. Thank you.

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Docket No. and Name: Docket No. 000121A - Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies (AT&T Florida Track).

Filed on behalf of: CompSouth

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Description of Documents: CLEC responses to the Action Item List generated from the 11/9-10/09 staff workshop.

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11/24/2009



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November 24, 2009

VIA ELECTRONIC FILING

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket 000121A -- Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies. (AT&T FLORIDA TRACK)

Dear Ms. Cole:

Please find attached for filing the Competitive Local Exchange Carrier ("CLEC") responses to the Action Item List generated from the November 9 – 10 staff workshop for the above docket. Please note that this filing represents the consensus of CLECs who participated in the workshop, including Comcast, STS and the members of CompSouth. STS intends to file Action Item No. 34 under separate cover.

Your assistance in this matter is greatly appreciated. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew V. Feil".

Matthew Feil

Enclosures

(11.209885.1)

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FPSC-COMMISSION CLERK

ITEM No. 1

REQUEST: Parties to discuss timeline for industry notification (separate from public notifications). Additionally, parties to discuss staff proposal of inserting language regarding a timeframe for objections to administrative changes.

RESPONSE: CLECs have agreed to the AT&T language (changes to the October 30th filing in legislative format) below. However, agreement on this issue is subject to documenting the precise notification process for plan changes. The details of the notification process have not been discussed yet.

Review of Measurements-Administrative Changes

A workshop and/or conference shall be organized and held periodically or at the request of either party for the purpose of evaluating the existing performance measures and determining whether any measures should be deleted, modified or any new measures added. Provided however, no new measures shall be added which measure activity already governed by existing measures. CLEC may actively participate in this periodic workshop with AT&T and other CLECs and state regulatory authority representative.

Administrative Changes

AT&T may make administrative changes that do not substantively change the SQM Plan. Such changes are excluded from the periodic review process noted above. AT&T will provide written notice to the Commission regarding all administrative changes. An administrative change is one that corrects typographical, spelling, grammatical, or computational errors, updates website addresses and incorporates modifications to architecture implemented in an OSS release following the approved Change Management process. Administrative changes will not change the intent or the plan language of the document. AT&T's written notice of the administrative changes shall be presumptively valid and deemed approved by the Commission effective thirty (30) calendar days after AT&T provides notice. No later than ten (10) business days after AT&T provides written notice of the administrative changes, affected CLECs must file written comments to the Commission to the extent such CLECs have objections or concerns regarding the application of the administrative changes.

ITEM No. 2

REQUEST: Language regarding simple port rules. Description of industry proposal – timing and intervals for simple port.

RESPONSE: See attached document.

**NORTH AMERICAN NUMBERING
COUNCIL (NANC)**

**LOCAL NUMBER PORTABILITY
ADMINISTRATION WORKING
GROUP (LNPA WG)**

**RECOMMENDED PLAN FOR
IMPLEMENTATION OF
FCC ORDER 09-41**

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

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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

The Local Number Portability Administration Working Group (LNPA WG) respectfully recommends that the North American Numbering Council (NANC) and the Federal Communications Commission (FCC) formally endorse and adopt the requirements identified in Section 3 of this implementation plan in their entirety.

1. Introduction

1.1. Adoption and Release of FCC Order 09-41

On May 13, 2009, the Federal Communications Commission (FCC) adopted and released the attached FCC Order 09-41, which mandates industry implementation of a one Business Day porting interval for simple ports.

FCC-09-41A1.pdf

Specifically, in paragraph 1, the Commission ruled, *"In this Report and Order (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 footnote 1 of FCC 09-41, the Commission defined "intermodal ports" as, *"(1) wireline-to-wireless ports; (2) wireless-to-wireline ports; and (3) ports involving interconnected Voice over Internet Protocol (VoIP) service. Because interconnected VoIP service can be provided over various types of facilities, we refer to all interconnected VoIP ports as "intermodal" irrespective of the facilities at issue."*

In paragraph 10 of FCC 09-41, the Commission further ruled the following with respect to its direction to the North American Numbering Council (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 porting interval. 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."

Regarding the implementation of the one-business day porting interval, the Commission further ruled in paragraphs 11-12 of FCC 09-41:

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“We further conclude that nine months is sufficient time for affected entities to implement and comply with the one-business day porting interval, and therefore require all providers subject to our LNP rules to comply with the one-business day porting interval within nine months from the date that the NANC submits its revised provisioning flows to the Commission, as discussed above, except as described below with regard to small providers. We believe that nine months provides adequate time for providers to make the necessary software changes and upgrades and to accommodate changes to internal processes and policies.” (paragraph 11)

“However, we recognize that some providers that do not employ automated systems for handling port requests and have limited resources to upgrade their systems may have to make more significant changes or upgrades than other providers that already employ automated porting interface. To address this disparity, we allow small providers, as defined below for purposes of this Report and Order, a longer period of time for implementing the porting interval of one business day. Thus, small providers are required to implement the reduced porting interval of one business day for simple wireline and simple intermodal ports no later than 15 months from the date that the NANC submits its revised provisioning flows to the Commission. For purposes of this Order, we consider providers with fewer than 2 percent of the nation’s subscriber lines installed in the aggregate nationwide and Tier III wireless carriers.” (paragraph 12)

Furthermore, in footnote 34 of FCC 09-41, the Commission stated:

“In this Order, we do not address whether it is necessary for the Commission to adopt a rule codifying the wireless industry’s voluntary two and one-half hour standard for wireless-to-wireless ports. This issue remains pending before the Commission.”

1.2. Key Dates Relative to FCC Order 09-41

It is the understanding of the LNPA WG that the following key dates are relative to the implementation of FCC 09-41:

- May 13, 2009 FCC 09-41 adopted and released by FCC
- July 2, 2009 FCC 09-41 published in Federal Register
- August 3, 2009 Effective date of FCC 09-41
- October 31, 2009 NANC Implementation Plan due to FCC
- July 31, 2010 Implementation deadline for affected entities

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- January 31, 2011 Implementation deadline for small providers¹

2. Background

2.1. LNPA WG Work Plan for FCC Order 09-41

Subsequent to the FCC's adoption and issuance of FCC Order 09-41, the Chair of the North American Numbering Council (NANC) joined the LNPA WG at its May 12-14, 2009 meeting to provide direction on the FCC's charge to the NANC to revise the NANC LNP Provisioning Flows in support of the shortened interval and to address the definition of a "business day" in the context of the shortened interval.

At the May 12-14, 2009 LNPA WG meeting, the Chair of the NANC directed the group to commence development of the necessary industry implementation plan in support of the Order and its mandated timeline. The NANC Chair also directed the LNPA WG to submit a high-level draft work plan to the NANC no later than May 19, 2009.

The LNPA WG "white-boarded" the items that participants identified as necessary for the industry to implement FCC Order 09-41. These items were then prioritized as "Higher," "Medium," and "Lower" priority items with tentative due dates to serve as a work plan guide to the industry and an indication of the relative importance of each item to be addressed.

On May 18, 2009, the LNPA WG submitted the attached Work Plan to the NANC Chair:

NANC LNPA WG
IMPLEMENTATION W

2.2. Formation of LNPA WG Sub-teams

In addition to developing the Implementation Work Plan attached above at its May 12-14, 2009 meeting, the LNPA WG also formed five sub-teams to work on various aspects of the Work Plan. After selection of the Chairpersons of each sub-team, they were directed by the LNPA WG to develop the objectives of their respective sub-team, and schedule

¹ The Commission defines "small providers" as those "with fewer than 2 percent of the nation's subscriber lines installed in the aggregate nationwide and Tier III wireless carriers, as defined in the *E911 Stay Order*." (cite FCC Order 09-41, paragraph 12)

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the necessary meetings, open to all who wished to participate, in order to meet their objectives in time for the LNPA WG to submit its required FCC Order 09-41 industry Implementation Plan.

Each of the five sub-teams was assigned items from the Work Plan attached above and was directed to identify all issues and questions related to their items and to attempt to reach consensus on the resolution for each within their sub-team. All decisions and recommendations reached in the sub-teams were to be brought to the full LNPA WG for discussion and a determination as to whether each sub-team recommendation would be included in the LNPA WG's implementation plan recommendation to NANC. In addition, if consensus could not be reached on a sub-team item, it would also be brought to the full LNPA WG for discussion and resolution. The participants of each of the sub-teams are identified in Section 5. The key decisions and recommendations of the sub-teams and the full LNPA WG are reflected in Section 3.

The work on revising the NANC LNP Provisioning Flows was done in the full LNPA Working Group and not in the sub-teams.

2.2.1. "Define One Business Day" Sub-team

Chairperson: Jan Doell, Qwest

The objectives of the "Define One Business Day" Sub-team were identified as follows:
To address how a "business day" should be construed for purposes of the porting interval, and generally how the porting time should be measured (stop and start times of a business day). Also, to address the Firm Order Confirmation (FOC) interval in relation to the One Business Day.

The items in the Work Plan attached above that were assigned to the "Define One Business Day" Sub-team were as follows:

- 2H. Define one business day:
 - How to measure porting time
 - FOC timeframe
- 1L. Potential NPAC Change Order to support 1 business day interval.
 - a. Possible new timers and indicator for which timer set to use on a port.
- 3L. Recommendations for other efficiency improvements (related to FNPRM).

The "Define One Business Day" Sub-team held thirteen (13) meetings in order to meet its objectives. The dates of these meetings were as follows:

- May 19, 2009

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- May 22, 2009
- May 28, 2009
- June 4, 2009
- June 8, 2009
- June 10, 2009
- June 22, 2009
- June 29, 2009
- July 7, 2009
- July 21, 2009
- August 4, 2009
- August 10, 2009
- August 18, 2009

2.2.2. "Define Simple Port" Sub-team

Chairpersons: Sue Tiffany, Sprint Nextel
Nancy Sanders, Comcast

The objectives of the "Define Simple Port" Sub-team were identified as follows:

To determine if a recommendation for any changes to the current definition of a Simple Port will be included in the LNPA WG's work package to be forwarded to the NANC.

The items in the Work Plan attached above that were assigned to the "Define Simple Port" Sub-team were as follows:

- 5H. Review of definition of a Simple Port and non-Simple Port for possible recommendation (Related to FNPRM).

The "Define Simple Port" Sub-team held ten (10) meetings in order to meet its objectives. The dates of these meetings were as follows:

- June 5, 2009
- June 12, 2009
- June 19, 2009
- June 26, 2009
- July 10, 2009
- July 17, 2009
- July 24, 2009
- August 7, 2009
- August 14, 2009
- August 21, 2009

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2.2.3. "Local Service Request (LSR)" Sub-team

Chairperson: Linda Peterman, One Communications

The objectives of the "Local Service Request (LSR)" Sub-team were identified as follows:

To explore pros/cons, Service Provider and NPAC impacts relative to an LSR 1-business day process solution to address FCC 09-41 requirements, inclusive of development of the process to be utilized.

The items in the Work Plan attached above that were assigned to the "Local Service Request (LSR)" Sub-team were as follows:

- 1H. Exploration of pros/cons and Service Provider and NPAC impacts related to various 1 business day port process options. The objective for this item is to explore development of a 1 business day port process using an LSR solution. Work on standardization of data fields would still continue for any solution (Related to FNPRM).
- 1M. Standardization of data fields (yes or no; if yes what are the fields) (Related to FNPRM).
 - a. Administrative/Provisioning data fields
- 2M. Changes to and/or standardization of LSR (Related to FNPRM).
- 3M. Establish CSR interval (Related to FNPRM).

The "Local Service Request (LSR)" Sub-team held thirteen (13) meetings in order to meet its objectives. The dates of these meetings were as follows:

- May 22, 2009
- May 27, 2009
- June 2, 2009
- June 8, 2009
- June 10, 2009
- June 22, 2009
- June 24, 2009
- July 1, 2009
- July 8, 2009
- July 24, 2009
- August 6, 2009
- August 13, 2009
- August 31, 2009

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2.2.4. "Out-of-the-Box" Sub-team

Chairperson: Teresa Patton, AT&T

The objectives of the "Out-of-the-Box" Sub-team were identified as follows:

To explore options to support the new FCC Order requiring that simple ports for wireline and intermodal be completed in 1 business day. These options are outside of the current LSR and WICIS/Wireless processes.

The items in the Work Plan attached above that were assigned to the "Out-of-the-Box" Sub-team were as follows:

- 1H. Exploration of pros/cons and Service Provider and NPAC impacts related to various 1 business day port process options. The objective for this item is to explore development of a 1 business day port process using an Out-of-the-box (non-LSR/non-WICIS) solution. Work on standardization of data fields would still continue for any solution (Related to FNPRM).

The "Out-of-the-Box" Sub-team held nine (9) meetings in order to meet its objectives.

The dates of these meetings were as follows:

- May 22, 2009
- June 2, 2009
- June 10, 2009
- June 23, 2009
- June 30, 2009
- July 7, 2009
- July 9, 2009
- July 20, 2009
- July 23, 2009

In addition, three (3) subcommittees were formed within the "Out-of-the-Box" Sub-team to discuss various alternatives in more detail. The subcommittees met as follows:

Service Bureau Solution Subcommittee:

- May 29, 2009
- June 1, 2009
- June 5, 2009
- June 12, 2009
- June 19, 2009
- June 25, 2009

NPAC Expansion Solution Subcommittee:

- June 2, 2009

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- June 4, 2009
- June 10, 2009
- June 16, 2009
- June 24, 2009
- July 6, 2009
- July 7, 2009

LSR/WPR Mapping Solution Subcommittee:

- June 5, 2009
- June 22, 2009

The "Out-of-the-Box" Sub-team explored five (5) alternatives to the current LSR and WICIS processes for inter-carrier communication during the porting process. Those solutions were:

- Service Bureau Solution:
 - Optional vendor solution which assists carriers in data transformations.
- NPAC Expansion Solution:
 - Combines the pre-port processes with the NPAC Create/Modify processes.
 - Expands the current port request (NPAC Create/Modify) messages utilized for porting between carriers to include necessary data for pre-port validation, E911 and Directory Assistance.
- Combination of Service Bureau and NPAC Expansion Solutions:
- ENUM Solution:
 - After discussing and analyzing this idea, it was deemed not viable and was dropped from consideration
- LSR/WPR Mapping:
 - The sub-team determined that this was not a new or "out-of-the-box" solution.

After extensive consideration, the sub-team narrowed the list of potential alternative solutions down to the Service Bureau Solution and the NPAC Expansion Solution. After discussion in the full LNPA WG, it was agreed that the Service Bureau Solution is available today should two carriers agree to enter into a bilateral agreement to use a third-party vendor to communicate with each other during the porting process. It was also agreed that the NPAC Expansion Solution would not be considered at this time due to the development necessary in Service Provider operational support systems.

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2.2.5. "WICIS" Sub-team

Chairperson: Deb Tucker, Verizon Wireless

The objectives of the "WICIS" Sub-team were identified as follows:

The primary goal of this sub-team is to work through the pros and cons of using the WICIS process as a solution to a one day wireline-to-wireline and intermodal porting interval. The group is tasked with determining what it would take to use WICIS vs. LSR or some other process.

The items in the Work Plan attached above that were assigned to the "WICIS" Sub-team were as follows:

- 1H. Exploration of pros/cons and Service Provider and NPAC impacts related to various 1 business day port process options. The objective for this item is to explore development of a 1 business day port process using a WICIS solution. Work on standardization of data fields would still continue for any solution (Related to FNPRM).

The "WICIS" Sub-team held four (4) meetings in order to meet its objectives. The dates of these meetings were as follows:

- May 19, 2009
- May 26, 2009
- June 2, 2009
- June 8, 2009

The benefits and strengths of using the WICIS standard format for all porting were discussed and extensively considered by the sub-team. The team concluded that due to the tremendous level of effort required for wireline providers to move away from the LSR process to the WICIS process, given the mandated timeframe, this solution was not feasible. On their June 8, 2009 conference call, the "WICIS" Sub-team participants reached consensus to disband the sub-team in order to allow participation in the other sub-teams.

**2.2.6. LNPA WG Liaison to ATIS Ordering & Billing Forum
(OBF)**

On May, 21, 2009, the LNPA WG sent a liaison to the ATIS Ordering & Billing Forum (OBF) acknowledging their ongoing work in developing a standard port request form and a standard set of data fields for both Simple and Non-Simple Ports. Through that liaison,

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the LNPA WG expressed interest in including the OBF's work in the LNPA WG implementation plan for FCC Order 09-41.

The LNPA WG requested the OBF to provide the final list of standard Local Service Request (LSR) data elements by July 15, 2009. The OBF cooperatively expedited their schedule in order to provide that list to the LNPA WG. The ATIS OBF's list of standard data elements, including validation, and port administration and provisioning fields, in support of both Simple and Non-Simple Ports, is attached in Section 3.5.1.

3. LNPA WG Key Decisions and Recommendations in Support of FCC Order 09-41 and of the Further Notice of Proposed Rulemaking

The following key decisions and recommendations were developed in the full LNPA WG and the five (5) sub-teams described above. The Local Number Portability Administration Working Group (LNPA WG) respectfully recommends that the North American Numbering Council (NANC) and the Federal Communications Commission (FCC) formally endorse and adopt the requirements identified in Section 3 of this implementation plan in their entirety.

3.1. *Definition of a "Business Day"*

The "Define One Business Day" Sub-team and the full LNPA WG reached consensus on the following recommendations in defining a "Business Day."

- All times discussed below, unless otherwise indicated, are based on local time in the predominant Time Zone of the NPAC Region where the End User's telephone number is being ported, as shown below:
 - Northeast region – EASTERN Time Zone
 - Mid-Atlantic - EASTERN Time Zone
 - Southeast region – EASTERN Time Zone
 - Midwest - CENTRAL Time Zone
 - Southwest region – CENTRAL Time Zone
 - West Coast region– PACIFIC Time Zone
 - Western region – MOUNTAIN Time Zone
- Mandatory Business Days are Monday through Friday, excluding the Old Service Provider's Company-defined holidays. Minimum Business Hours are 8am to 5pm, Monday through Friday, excluding the Old Service Provider's

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Company-Defined holidays, in the Predominant Time Zone of the NPAC Region for the end user's telephone number. (*Caveat: Although the examples may show activities happening outside the normal business day definition, no provider is required to have staff support available for those activities which fall outside of the One Business Day 0800-1700 Mon-Fri, excluding old SP company-defined holidays.*)

- The LSR-to-FOC interval is included in the One Business Day.
- The cutoff time on a Business Day for receipt of an accurate and complete Local Service Request (LSR) by the Old Service Provider (Old SP) in order for a Simple Port request to be eligible for activation at 12:00am (Midnight) the next Business Day is 1pm local time in the predominant Time Zone of the NPAC Region where the End User's telephone number is being ported. Simple Port LSRs received after the 1pm cutoff will be considered to be received on the following Business Day, and the Response clock starts at 8am (local time in the predominant time zone of the NPAC Region where the number is being ported), with the Response (FOC or reject, whichever is applicable) due no later than 12:00pm (Noon).
- Simple ports will be determined based on the FCC definition of a Simple Port. The following Firm Order Confirmation (FOC) response parameters will apply for Local Service Requests (LSRs) submitted by the New Service Provider as Simple Port requests:
 1. If the New SP-requested due date is 1-2 Business Days after LSR receipt, the Firm Order Confirmation (FOC) or Reject (whichever is applicable) is due within 4 hours, provided the LSR is received by the Old SP by the 1pm Business Day cutoff time (local time in the predominant time zone of the NPAC Region where the number is being ported). See "Simple Port: LSR to FOC Interval Chart" below.
 2. If the New SP-requested due date is 3 or more business days after LSR receipt, the Firm Order Confirmation (FOC) or Reject (whichever is applicable) is due within 24 clock hours.

In instances where the LSR indicates the port request is Non-Simple based on the current FCC definition and rule for a Simple Port, the Old SP must return an FOC or appropriate response within 24 clock hours. However, if there is no obvious indication that the port request is Non-Simple and was requested as a Simple Port with a requested 1-2 Business Day due date, but the Old SP determined that it is a Non-Simple Port, a response is due back to the New SP

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in four (4) hours (either an FOC with an extended due date or a Reject (whichever is applicable) in accordance with the following chart.

In accordance with the consensus decision reached by the "Define One Business Day Sub-team" and the full LNPA WG, the following chart will apply to No.1 above:

Chart 1: SIMPLE PORT - LSR to FOC INTERVAL CHART

Accurate/Complete LSR received	FOC or Applicable Response Due back by day/time
Mon 8:00am through 8:59am	Mon 12:00pm (noon) through 12:59pm
Mon 9:00am through 9:59am	Mon 1:00pm through 1:59pm
Mon 10:00am through 10:59am	Mon 2:00pm through 2:59pm
Mon 11:00am through 11:59am	Mon 3:00pm through 3:59pm
Mon 12:00pm (noon) through 12:59pm	Mon 4:00pm through 4:59pm
Mon 1:00pm	Mon 5:00pm
Mon 1:01pm through Tues 7:59am	Tues 12:00pm (noon)
Tues 8:00am through 8:59am	Tues 12:00pm (noon) through 12:59pm
Tues 9:00am through 9:59am	Tues 1:00pm through 1:59pm
Tues 10:00am through 10:59am	Tues 2:00pm through 2:59pm
Tues 11:00am through 11:59am	Tues 3:00pm through 3:59pm
Tues 12:00pm (noon) through 12:59pm	Tues 4:00pm through 4:59pm
Tues 1:00pm	Tues 5:00pm
Tues 1:01pm through Weds 7:59am	Weds 12:00pm (noon)
Weds 8:00am through 8:59am	Weds 12:00pm (noon) through 12:59pm
Weds 9:00am through 9:59am	Weds 1:00pm through 1:59pm
Weds 10:00am through 10:59am	Weds 2:00pm through 2:59pm
Weds 11:00am through 11:59am	Weds 3:00pm through 3:59pm
Weds 12:00pm (noon) through 12:59pm	Weds 4:00pm through 4:59pm
Weds 1:00pm	Weds 5:00pm
Weds 1:01pm through Thurs 7:59am	Thurs 12:00pm (noon)
Thurs 8:00am through 8:59am	Thurs 12:00pm (noon) through 12:59pm
Thurs 9:00am through 9:59am	Thurs 1:00pm through 1:59pm
Thurs 10:00am through 10:59am	Thurs 2:00pm through 2:59pm
Thurs 11:00am through 11:59am	Thurs 3:00pm through 3:59pm
Thurs 12:00pm (noon) through 12:59pm	Thurs 4:00pm through 4:59pm
Thurs 1:00pm	Thurs 5:00pm
Thurs 1:01pm through Fri 7:59am	Fri 12:00pm (noon)
Fri 8:00am through 8:59am	Fri 12:00pm (noon) through 12:59pm
Fri 9:00am through 9:59am	Fri 1:00pm through 1:59pm
Fri 10:00am through 10:59am	Fri 2:00pm through 2:59pm

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Fri 11:00am through 11:59am	Fri 3:00pm through 3:59pm
Fri 12:00pm (noon) through 12:59pm	Fri 4:00pm through 4:59pm
Fri 1:00pm	Fri 5:00pm
Fri 1:01pm through Mon 7:59am	Mon 12:00pm (noon)
(go back to top of chart)	

- The New Service Provider (New SP) must have received the FOC from the Old SP before sending their New SP Subscription Version (SV) Create message to the NPAC.
- The following chart will govern the indicated intervals for LSR Received-to-FOC Return to Ready-to-Port times for a full Business Week:

**Chart 2: One Business Day: FCC09-41
 LSR Submit/FOC Receipt and Prospective Due Date/Time Chart
 for Normal Business Week (no Holidays)**

Note: This chart does not reflect what happens when an Old Service Provider Company-Defined Holiday falls on Monday through Friday. Anytime that happens, the activity that would have fallen on the holiday will happen the following business day.

Accurate/Complete LSR received	FOC Due back by date/time (See Footnote 1)	Ready-to-Port Day/time (see Footnote 2)
Mon 8:00am through 8:59am	Mon 12:00pm (noon) through 12:59pm	Tues 00:00:00
Mon 9:00am through 9:59am	Mon 1:00pm through 1:59pm	Tues 00:00:00
Mon 10:00am through 10:59am	Mon 2:00pm through 2:59pm	Tues 00:00:00
Mon 11:00am through 11:59am	Mon 3:00pm through 3:59pm	Tues 00:00:00
Mon 12:00pm (noon) through 12:59pm	Mon 4:00pm through 4:59pm	Tues 00:00:00
Mon 1:00pm	Mon 5:00pm	Tues 00:00:00
Mon 1:01pm through Tues 7:59am	Tues 12:00pm (noon)	Weds 00:00:00
Tues 8:00am through 8:59am	Tues 12:00pm (noon) through 12:59pm	Weds 00:00:00
Tues 9:00am through 9:59am	Tues 1:00pm through 1:59pm	Weds 00:00:00
Tues 10:00am through 10:59am	Tues 2:00pm through 2:59pm	Weds 00:00:00
Tues 11:00am through 11:59am	Tues 3:00pm through 3:59pm	Weds 00:00:00
Tues 12:00pm (noon) through 12:59pm	Tues 4:00pm through 4:59pm	Weds 00:00:00
Tues 1:00pm	Tues 5:00pm	Weds 00:00:00
Tues 1:01pm through Weds 7:59am	Weds 12:00pm (noon)	Thurs 00:00:00
Weds 8:00am through 8:59am	Weds 12:00pm (noon) through 12:59pm	Thurs 00:00:00
Weds 9:00am through 9:59am	Weds 1:00pm through 1:59pm	Thurs 00:00:00
Weds 10:00am through 10:59am	Weds 2:00pm through 2:59pm	Thurs 00:00:00

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Weds 11:00am through 11:59am	Weds 3:00pm through 3:59pm	Thurs 00:00:00
Weds 12:00pm (noon) through 12:59pm	Weds 4:00pm through 4:59pm	Thurs 00:00:00
Weds 1:00pm	Weds 5:00pm	Thurs 00:00:00
Weds 1:01pm through Thurs 7:59am	Thurs 12:00pm (noon)	Fri 00:00:00
Thurs 8:00am through 8:59am	Thurs 12:00pm (noon) through 12:59pm	Fri 00:00:00
Thurs 9:00am through 9:59am	Thurs 1:00pm through 1:59pm	Fri 00:00:00
Thurs 10:00am through 10:59am	Thurs 2:00pm through 2:59pm	Fri 00:00:00
Thurs 11:00am through 11:59am	Thurs 3:00pm through 3:59pm	Fri 00:00:00
Thurs 12:00pm (noon) through 12:59pm	Thurs 4:00pm through 4:59pm	Fri 00:00:00
Thurs 1:00pm	Thurs 5:00pm	Fri 00:00:00
Thurs 1:01pm through Fri 7:59am	Fri 12:00pm (noon)	Mon 00:00:00
Fri 8:00am through 8:59am	Fri 12:00pm (noon) through 12:59pm	Mon 00:00:00
Fri 9:00am through 9:59am	Fri 1:00pm through 1:59pm	Mon 00:00:00
Fri 10:00am through 10:59am	Fri 2:00pm through 2:59pm	Mon 00:00:00
Fri 11:00am through 11:59am	Fri 3:00pm through 3:59pm	Mon 00:00:00
Fri 12:00pm (noon) through 12:59pm	Fri 4:00pm through 4:59pm	Mon 00:00:00
Fri 1:00pm	Fri 5:00pm	Mon 00:00:00
Fri 1:01pm through Mon 7:59am	Mon 12:00pm (noon)	Tues 00:00:00
(go back to top of chart)		

[Business Week Chart 2- Footnote 1] The FOC interval is 4 business hours. However, for LSR's arriving after the 1pm cutoff time, the LSR will be considered received at 8am the next Business Day. The Old Service Provider must respond to an LSR within 4 business hours, as indicated on the Business Week Chart, with either an FOC (complete and accurate LSR received) or a reject (incomplete and/or inaccurate LSR received).

[Business Week Chart 2- Footnote 2] The port will be ready to activate on the business day and time indicated in this column. No provider is required to allow activation on a non-Business Day (Saturday, Sunday or Old Service Provider Company-Defined Holiday). However, a non-Business Day activation may be performed as long as **both** Service Providers agree and any Service Provider activating a port on a non-Business Day understands the porting out Service Provider may not have, and is not required to have, operational support available on days not defined as business days. In agreeing to non-Business Day activations, the Old (porting out) Service Provider may require that the LSR/FOC and the New (porting in) Service Provider NPAC Create message be due-dated for the appropriate normal business day seen in Ready-to-Port column, in order to ensure that the end user's service is maintained.

[Business Week Chart 2- Footnote 3] Minimum Business Hours are 8am to 5pm, Monday through Friday, excluding the Old Service Provider's Company-Defined holidays, in the Predominant Time Zone of the NPAC Region for the end user's telephone number. (Caveat:

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Although the examples may show activities happening outside the normal business day definition, no provider is required to have staff support available for those activities which fall outside of the One Business Day 0800-1700 Mon-Fri, excluding old SP company-defined holidays.)

3.2. **Recommended Revised NANC LNP Provisioning Flows**

Attached are the revised NANC LNP Provisioning Flows (Diagrams and accompanying Narratives) in their entirety that are recommended for adoption in support of all porting, both for Simple Ports in one Business Day and for Non-Simple Ports in the four Business Day interval:

NANC Flows v4.0 -
09-01-2009.ppt

NANC OPS_Flows_N
arratives v4.0 (09-16

Following is a high-level summary of the recommended changes made to the NANC LNP Provisioning Flows:

- **Figure 1 – Port Type Determination:** This is a new flow that will be used to determine the type of port at the beginning of the process, i.e., wireless-to-wireless, wireline-to-wireline or intermodal Simple or Non-Simple, if Broadband/DSL is involved, in order to point the process user to the appropriate subsequent flows.

Key recommendations contained in this flow include:

- The Old Local Service Provider cannot require a physical copy of the end user authorization to be provided before processing the Customer Service Record (CSR) or the port request.
- The Old Service Provider shall not require the New SP to have previously obtained a CSR before they will accept an LSR from the New Service Provider. For those New Service Providers that choose not to obtain a CSR, they understand that there is heightened risk that their LSR may not be complete and accurate. This is not intended to preclude those providers who provide an ordering Graphical User Interface (GUI) from including a step involving a real-time CSR pull within that process, as long as an alternate ordering process is available that does not require a CSR being pulled.

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- CSRs must be returned within 24 clock hours, unless otherwise negotiated between Service Providers, excluding weekends and Old Service Provider holidays.
- Any of the End User validation fields required by the Old Service Provider on an incoming LSR must be available on the CSR, excluding End User requested and assigned password/PIN.
- Only passwords/PINs requested and assigned by the End User may be utilized as an End User validation field on an incoming LSR by the Old Network Service Provider/Old Local Service Provider. Any Service Provider assigned password/PIN may not be utilized as a requirement in order to obtain a CSR.
- **Figure 3 – Broadband Verification Process:** This is a new optional flow that will be used to determine if the porting End User has Broadband/DSL on their line and/or if Broadband/DSL is necessary for the New SP to provide voice service to the porting End User, for continuity of service.
- **Figure 4 – Wireline Simple Port LSR/FOC Process:** This is a new flow that will be used for wireline-to-wireline and intermodal Simple Ports where the New Service Provider-requested Due Date is either one or two Business Days beyond the LSR receipt date.

Key recommendations contained in this flow include:

- The New Service Provider (the New Local Service Provider and/or the New Network Service Provider, whichever is applicable) must make every reasonable effort to verify that the port request is in fact a Simple Port request, e.g., pulling a Customer Service Record if available, or asking the appropriate questions of the End User, etc.
- Communication between the Old Network Service Provider and the Old Local Service Provider with regard to the port must not delay the validation or processing of the port request.
- For wireline-to-wireline ports, and ports between wireline and wireless Service Providers, the following requirements apply for the interval to respond to an LSR:
 - If the New Service Provider-requested due date is 1-2 business days after LSR receipt, the Firm Order Confirmation (FOC) or Reject (whichever is applicable) is due within 4 hours.

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- If the New Service Provider-requested due date is 3 or more business days after LSR receipt, the Firm Order Confirmation (FOC) or Reject (whichever is applicable) is due within 24 clock hours, excluding weekends and Old Service Provider-defined holidays.
- In instances where the LSR indicates the port request is Non-Simple based on the current FCC definition and rule for a Simple Port, the Old Service Provider must return a FOC or appropriate response within 24 clock hours, excluding weekends and Old Service Provider-defined holidays.
- For port requests that are submitted by the New Service Provider as a Simple Port, but are determined to be Non-Simple by the Old Service Provider, this flow also provides an option for the Old Service Provider to return an FOC with a due date applicable for a Non-Simple Port, rather than a Reject response.
- Figure 5 – Wireline Non-Simple Port LSR/FOC Process: This is a revised flow that will be used for wireline-to-wireline and intermodal Non-Simple Ports in addition to Simple Port requests where the New Service Provider-requested Due Date is three or more Business Days beyond the LSR receipt date.
- Figure 6 – Main Porting Flow: This is a revised flow that depicts a number of the process steps that are common to all port types.

Key recommendations contained in this flow include:

- For wireline Simple Ports, the cutoff time for when the Old Service Provider can place a port into conflict in the NPAC is the later of:
 - a) 9:00pm in the predominate time zone of the NPAC region where the number is being ported one business day before the Due Date, or
 - b) the NPAC T2 Timer has expired. The restriction window for when the New Service Provider cannot remove the port from conflict is defined as two (2) NPAC Business Hours.
- For both Simple and Non-Simple Ports, the Old Network Service Provider must deploy the 10-digit trigger in the donor switch, if technically feasible, or monitor the NPAC for activation in order to trigger the disconnect, or carriers perform a database query for every call origination.

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- Figure 7 – Subscription Version Create Flow: This is a revised flow that depicts the steps necessary for the New and Old Service Providers to create and concur with a pending port.

Key recommendations contained in this flow include:

- The NPAC/SMS expects to receive matching Subscription Version (SV) Create messages from the Old Network Service Provider (ONSP) and the New Network Service Provider (NNSP) when facilitating porting of a telephone number. However, to prevent the possibility of the ONSP unnecessarily delaying a port, two timers were developed and referred to as T1 and T2. If the ONSP does not send a matching SV create message to the NPAC, the NNSP can proceed with porting the telephone number after both timers expire. Some Service Providers choose not to send the concurring SV create, but rather allow the timers to expire.

The LNPA Working Group concludes that all Service Providers should send the matching SV create messages to the NPAC/SMS. This will facilitate expeditious porting of telephone numbers and is more efficient than merely allowing timers to expire. The increased efficiency is especially beneficial in meeting the FCC mandated 1-day interval for Simple Ports. [Note that the order in which the ONSP and NNSP create messages arrive at the NPAC/SMS is immaterial.]

- With regard to the population of the Due Time on the New SP and Old SP NPAC Create messages, current industry practices for both Mechanized SOA and Low Tech Interface (LTI) users will be maintained for Simple Ports.

The New SP should not activate a port before midnight (00:00:00) local time of the Due Date unless it has been verified with the Old SP that the port could be activated early without impacting the customer's service. Failing to verify first that the Old SP has completed all necessary steps in the port-out process, e.g., established the 10-Digit Unconditional Trigger, resolved any order fallout in systems, etc., could result in the customer's service being negatively impacted, such as inability to receive all of their calls.

- A new additional set of NPAC T1 and T2 timers is recommended for use in the shorter porting interval. The LNPA WG reached consensus that these timers should run for 3 NPAC Business Hours each. The LNPA WG also reached consensus that the NPAC Business Hours for the shorter porting interval will be defined as 7am -12am Monday through Friday,

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excluding NPAC-defined Holidays in the predominant time zone for each NPAC region.

- **Figure 8 – Reseller/Interconnected VoIP Provider/Type 1 Notification Flow:** This is a revised flow that depicts any notification steps between a Network Service Provider and their subtending Local Service Provider, e.g., a Reseller. This flow was revised to add Interconnected VoIP Providers.

Key recommendations contained in this flow include:

- The LNPA WG identifies three classes of Interconnected VoIP providers in the NANC LNP Provisioning Flows, defined as follows:

Class 1: A standalone interconnected VoIP provider that obtains numbering resources directly from the North American Numbering Plan Administrator (NANPA) and the Pooling Administrator (PA) and connects directly to the Public Switched Telephone Network (PSTN) (i.e., not through a PSTN Service Provider partner's end office switch). Class 1 standalone interconnected VoIP providers must follow the appropriate Wireline-Wireline/Intermodal Flows (Simple or Non-Simple, whichever is applicable) for the LNP provisioning process, serving as the New Network Service Provider (NNSP) or Old Network Service Provider (ONSP), whichever is applicable.

Class 2: An interconnected VoIP provider that partners with a facilities-based Public Switched Telephone Network (PSTN) Service Providers to obtain numbering resources and connectivity to the PSTN via the Service Provider partner's switch. A Class 2 interconnected VoIP provider is not considered a reseller in the context of the FCC definition of a Simple Port (refer to FCC Order 07-188 and FCC Order 09-41 for Simple Port definition). Class 2 interconnected VoIP providers must follow the appropriate Wireline-Wireline/Intermodal Flows (Simple or Non-Simple, whichever is applicable) for the LNP provisioning process, serving as the New Local Service Provider (NLSP) or Old Local Service Provider (OLSP), whichever is applicable.

Class 3: A non-facilities-based reseller of interconnected VoIP services that utilizes the numbering resources and facilities of another interconnected VoIP provider (analogous to the "traditional" PSTN reseller). A Class 3 interconnected VoIP provider is not considered a reseller in the context of the FCC definition of a Simple Port (refer to FCC Order 07-188 and FCC Order 09-41 for Simple Port definition). Class 3 interconnected VoIP providers must follow the appropriate Wireline-Wireline/Intermodal Flows (Simple or Non-Simple, whichever is

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applicable) for the LNP provisioning process, serving as the New Local Service Provider (NLSP) or Old Local Service Provider (OLSP), whichever is applicable.

- Figure 10 – Provisioning With Unconditional 10-Digit Trigger: This is a revised flow depicting steps when the Old Network Service Provider utilizes the 10-Digit Unconditional Trigger in their donor switch.

Key recommendations contained in this flow include:

- For both Simple and Non-Simple Ports, the wireline ONSP must deploy the 10-digit trigger in the donor switch, if technically feasible, or monitor the NPAC for activation in order to trigger the disconnect, or carriers perform a database query for every call origination.

- Figure 11 – Conflict Flow For The Service Creation Provisioning Process: This is a revised flow that depicts the steps when the Old Service Provider places a pending port into conflict due to an identified problem.

Key recommendations contained in this flow include:

- For wireline Simple Ports, the cutoff time for when the Old Service Provider can place a port into conflict in the NPAC is the later of a) 9:00pm in the predominate time zone of the NPAC region where the number is being ported one business day before the Due Date or b) the NPAC T2 Timer has expired. The restriction window for when the New Service Provider cannot remove the port from conflict is defined as two (2) NPAC Business Hours.

3.3. *Recommended Industry LNP Best Practices*

During the development of this implementation plan recommendation, the “Define One Business Day” Sub-team and the full LNPA WG identified the following LNP Best Practices for consideration by the NANC and FCC. If endorsed and adopted, the LNPA WG intends to include these in its LNP Best Practices document to assist the industry in the porting process.

- With regard to the population of the Due Time on the New SP and Old SP NPAC Create messages, current industry practices for both Mechanized SOA and Low Tech Interface (LTI) users will be maintained for Simple Ports. As an industry Best Practice, the New SP should not activate a port before midnight (00:00:00) local time of the Due Date unless it has been verified with the Old SP that the port could be activated early without

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impacting the customer's service. Failing to verify first that the Old SP has completed all necessary steps in the port-out process, e.g., established the 10-Digit Unconditional Trigger, resolved any order fallout in systems, etc., could result in the customer's service being negatively impacted, such as inability to receive all of their calls.

- **Subscription Version (SV) Create**

The NPAC/SMS expects to receive matching SV Create messages from the Old Service Provider (Old SP) and the New Service Provider (New SP) when facilitating porting of a telephone number. However, to prevent the possibility of the Old SP unnecessarily delaying a port, two timers were developed and referred to as T1 and T2. If the Old SP does not send a matching SV create message to the NPAC, the New SP can proceed with porting the telephone number after both timers expire. Some Service Providers choose not to send the concurring SV create, but rather allow the timers to expire.

As an Industry Best Practice, the LNPA Working Group concludes that all Service Providers should send the matching SV create messages to the NPAC/SMS. This will facilitate expeditious porting of telephone numbers and is more efficient than merely allowing timers to expire. The increased efficiency is especially beneficial in meeting the FCC mandated 1-day interval for simple ports.

[Note that the order in which the Old SP and New SP create messages arrive at the NPAC/SMS is immaterial.]

3.4. *Recommended NPAC and Local Service Order Activation (SOA) and Local Service Management System (LSMS) Change Orders*

During the development of the recommended requirements in support of FCC Order 09-41, the LNPA WG identified the following Change Orders required for the NPAC to support the shortened porting interval. These changes in the NPAC will also require changes in Service Provider local systems, e.g., SOA, LSMS, Operational Support Systems (OSSs), etc.

It is necessary for the LNPA WG to develop the detailed technical requirements for these Change Orders in order for NPAC, local system vendors, and Service Providers to develop and implement the software changes in time to meet the mandated

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implementation date. The development and finalization of these technical requirements will begin immediately.

At a high level, two Change Orders have been identified for development:

- A new additional NPAC timer set (called Medium timers) in support of the shortened interval.
- A method for the NPAC to determine which timer set to utilize on a port.

**3.5. LNPA WG Recommendations Related to FCC Order
09-41's Further Notice of Proposed Rulemaking**

The LNPA WG reached consensus on the following recommendations including items referenced in the Further Notice of Proposed Rulemaking (FNPRM) as part of FCC Order 09-41. The LNPA WG recommends that these be endorsed and adopted for immediate implementation at the commencement of One Business Day porting.

3.5.1. Standard Local Service Request (LSR) Data Fields

In response to the liaison from the LNPA WG to the ATIS Ordering & Billing Forum (OBF), the OBF quickly responded by scheduling the necessary meetings in order to pull up their previous planned delivery date for a standard set of LSR data fields in support of both Simple and Non-Simple Ports, including validation, and port administration and provisioning.

The attached spreadsheet contains the OBF-developed standard set of data elements for Wireline-to-Wireline and Intermodal ordering of standalone number portability.

Combined REQTYPC
data elements final.xl

Industry-wide standard implementation of the amended OBF practices, inclusive of this standard set of data elements, is contingent upon a mandate from the FCC. Without such mandate, implementation is at the discretion of the individual companies involved.

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3.5.2. Recommended Simple Port Definition Clarifications

The current FCC definition of a Simple Port, as cited in FCC Order 09-41, Footnote 11 on page 3, is as follows:

“As the Commission previously has explained, simple ports are those ports that: (1) do not involve unbundled network elements; (2) involve an account only for a single line; (3) do not include complex switch translations (e.g., Centrex, ISDN, AIN services, remote call forwarding, or multiple services on the loop); and (4) do not include a reseller.”

The “Define Simple Port” Sub-team and the full LNPA WG reached consensus on the following recommended clarifications to the current Simple Port definition:

- With respect to criteria (1) above on unbundled network elements, the following consensus was reached on clarifying language:

The LNPA-WG’s understanding of current industry practices regarding UNE involvement in porting a Simple Port is that the UNE’s of Dedicated Transport, 911/E911, or Operational Support Systems are not a factor in determining or executing a Simple Port.

- With respect to criteria (2) above on a single line account, the following consensus was reached on clarification:

A Simple Port is for a single telephone number (TN) in a single line account.

- With respect to criteria (3) above on complex switch translations, the following consensus was reached on clarifying language:

For single TN ports, the services cited as examples are not necessarily provided utilizing complex switch translations. If the other criteria defining a Simple Port would otherwise lead to classifying a port as Simple, the porting of the customer with any of these services could be classified as Simple.

**3.5.3. Recommended Customer Service Record (CSR)
Requirements**

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The "Local Service Request (LSR)" Sub-team and the full LNPA WG reached consensus on the following recommended requirements associated with Customer Service Records (CSRs).

- The Old Local Service Provider cannot require a physical copy of the end user authorization to be provided before processing the Customer Service Record (CSR) or the port request.
- The Old Service Provider shall not require the New SP to have previously obtained a CSR before they will accept an LSR from the New Service Provider. For those New Service Providers that choose not to obtain a CSR, they understand that there is heightened risk that their LSR may not be complete and accurate. This is not intended to preclude those providers who provide an ordering Graphical User Interface (GUI) from including a step involving a real-time CSR pull within that process, as long as an alternate ordering process is available that does not require a CSR being pulled.
- CSRs must be returned within 24 clock hours, unless otherwise negotiated between Service Providers, excluding weekends and Old Service Provider holidays.
- Any of the End User validation fields required by the Old Service Provider on an incoming LSR must be available on the CSR, excluding End User requested and assigned password/PIN.
- Only passwords/PINs requested and assigned by the End User may be utilized as an End User validation field on an incoming LSR by the Old Network Service Provider/Old Local Service Provider. Any Service Provider assigned password/PIN may not be utilized as a requirement in order to obtain a CSR.

The LNPA WG respectfully recommends that these be endorsed by the North American Numbering Council (NANC) and adopted by the Federal Communications Commission (FCC).

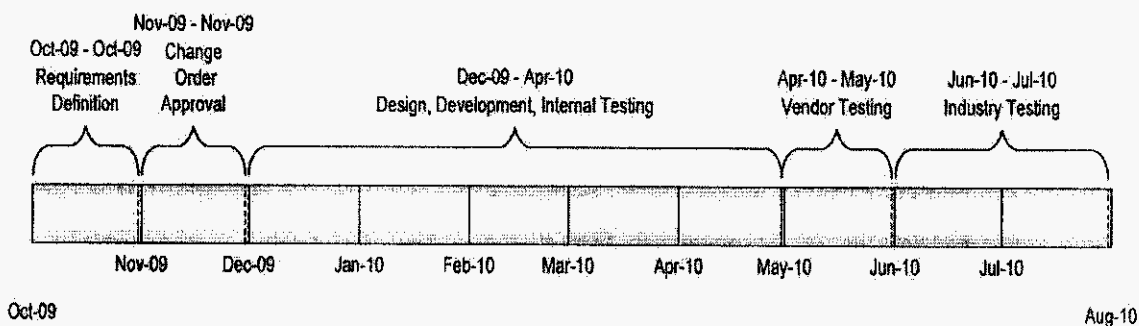
4. Conclusion

During the development of this recommended implementation plan in support of the shortened porting interval mandated in FCC Order 09-41, many complex issues were addressed by a wide representation of the telecommunications industry, including large and small Incumbent Local Exchange Carriers (ILECs), large and small Competitive Local Exchange Carriers (CLECs), Wireless Service Providers, Cable Service Providers,

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Voice over Internet Protocol (VoIP) Service Providers, Regulators, numerous Carrier Associations, system vendors, Service Bureaus, and consultants. The spirit of cooperation and the desire to reach compromise on these complex and sometimes difficult issues are a testament to the industry, and especially, the participants' continued focus on the need to develop a recommendation that not only is in the best interest of the customer, but also can be implemented by vendors and Service Providers within the mandated implementation schedule.

The following is a very high-level rough timeline that the industry will follow as a guide in order to implement FCC Order 09-41 as mandated:



- NPAC Change Orders completed and submitted to the NAPM LLC with a recommendation that the NAPM LLC request a Statement of Work (SOW) from NeuStar: October 30, 2009
- SOW approved by NAPM LLC: November 2009
- Design, development, internal testing, and vendor-vendor testing period: December 1, 2009 – May 31, 2010
- Industry testing (LSR/FOC and SOA/NPAC) and issues resolution June 1, 2010 – July 31, 2010
- Implementation deadline for affected entities: July 31, 2010
- Implementation deadline for small providers: January 31, 2011

The Local Number Portability Administration Working Group (LNPA WG) respectfully recommends that the North American Numbering Council (NANC) and the Federal Communications Commission (FCC) formally endorse and adopt the requirements identified in Section 3 of this implementation plan in their entirety.

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5. Full LNPA WG and Sub-team Participants

The following chart acknowledges and lists the individuals that participated in the full LNPA WG and/or the Sub-teams in order to develop this recommended implementation plan, and their respective Company that they represent.

An "X" in a column indicates an individual's participation.

NAME	COMPANY	LNPA WG	"DEFINE ONE BUSINESS DAY" SUB-TEAM	"DEFINE SIMPLE PORT" SUB-TEAM	"LSR" SUB-TEAM	"OUT OF THE BOX" SUB-TEAM	"WICIS" SUB-TEAM
Paula Jordan	T-Mobile	X Co-Chair	X		X		
Gary Sacra	Verizon	X Co-Chair	X	X	X		
Jan Doell	Qwest	X	X Chair	X	X		
Sue Tiffany	Sprint Nextel	X	X	X Chair	X		
Nancy Sanders	Comcast	X		X Chair			
Linda Peterman	One Communications	X	X	X	X Chair	X	X
Teresa Patton	AT&T	X		X		X Chair	
Deb Tucker	Verizon Wireless	X	X	X		X	X Chair
Mary Gail Sullivan	360 Networks	X					
Alissa Medley	ATIS	X					X

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Mark Lancaster	AT&T	X	X	X	X	X	
Ron Steen	AT&T	X	X	X	X		
Tracey Guidotti	AT&T	X	X		X	X	
Renee Dillon	AT&T	X			X		
Lonnie Keck	AT&T	X	X	X	X		X
Drew Bretz	AT&T	X					
Manny Camacho	AT&T		X				
Dave Clippard	AT&T		X				
Barbara Hjelmaa	Bighthouse Networks	X					
Marian Hearn	Canadian LNP Consortium	X					
Brad E. Lerner	Cavalier Telephone	X	X	X			
Nancy Cornwell	CellCom	X					
Vicki Goth	Century Link	X	X	X			
Tonya Woods	Century Link		X	X	X		
Bill Solis	Comcast	X		X			
Tim Kagele	Comcast	X		X			
Cindy Sheehan	Comcast	X	X	X			
Jen Aspeslagh	Comcast	X					
Beth O'Donnell	Comcast	X		X			

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Elizabeth Balvin	Covad	X					
Anthony Hansel	Covad			X			
Cindy Williamson	Cox		X	X			
Dawn Howard	Cox		X	X			
Jennifer Hutton	Cox		X				
Susanne Howard	Cox	X					
Aimee Brice	Cox				X		
Matt Gerst	CTIA	X					
Dennis Robins	DER Consulting	X	X				
Greg Council	Evolving Systems	X			X	X	X
Steve Farnsworth	Evolving Systems	X				X	
Linda Birchem	Fairpoint		X	X			
Crystal Hanus	GVNW	X	X	X	X		X
Ann Vick	GVNW		X				
Bonnie Johnson	Integra	X	X	X	X		X
Kim Isaacs	Integra			X	X		
Stephanie Prull	Integra				X		X

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Angie Mackey	JSI	X					
Bridget Alexander	JSI	X	X		X		
Karen Hoffman	JSI	X	X				
Lynette T. Khirallah	NetNumber	X					
Jason Bach	Level 3	X					
Don Gray	Nebraska PSC		X				
Dave Garner	NeuStar	X			X		
Jim Rooks	NeuStar	X	X	X	X	X	X
John Nakamura	NeuStar	X	X	X	X	X	X
Paul LaGattuta	NeuStar	X	X	X	X	X	X
Steve Addicks	NeuStar	X	X	X	X	X	X
Syed Mubeen Saifullah	NeuStar	X	X		X	X	X
Marybeth Degeorgis	NeuStar	X					
Shannon Sevigny	NeuStar	X					
Tara Farquhar	NeuStar	X					
Deepak Sonor	NeuStar	X					
Bill Reidway	NeuStar				X		X
Mary Conquest	Nuvox	X	X	X			
John McHugh	OPASTCO	X	X				

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Peggy Rubino	Paetec	X	X	X			
Towanda Russell	RCN	X					
Matt Kohly	Socket	X		X			
Mary Retka	Qwest	X					
Carolyn Brown	Qwest		X	X	X		
Lee Gomez	Qwest				X		
Carol Fricke	Sprint Nextel	X			X		
Lavinia Rotaru	Sprint Nextel	X	X	X		X	
Rosemary Emmer	Sprint Nextel	X					X
Jim Gampper	Sprint Nextel	X	X				
Neray Prakash	Sprint Nextel	X					
Iam Ximmies	Synchronoss Technologies	X					
Bob Bruce	Syniverse	X	X			X	
Sara Cole	TDS	X					
Pat White	Telcordia	X			X	X	X
Matt Timmermann	Telcordia		X		X	X	X
John Malyar	Telcordia	X			X	X	X
Adam Newman	Telcordia	X	X		X	X	X
Anna Miller	T-Mobile	X		X			

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Mohamed Samater	T-Mobile	X				X	X
Heather Patterson	TNS	X					
Amanda Molina	Townes	X	X				
Dennis Rose	TSTCI			X			
Shelly Pedersen	TW Telecom			X			
Tanya Golub	US Cellular	X					
David Lund	US Cellular	X					
Cindy Olson	US Cellular	X					
Darla Pistulka	Vantage Point		X				
Jason Lee	Verizon	X	X	X			
Darren Krebs	Vonage	X					
Tom Zablocki	Vonage	X					
Tana Henson	Windstream		X				
Loriann Burke	XO Communications	X	X	X			
Tiki Gaugler	XO Communications	X	X	X			
Dawn Lawrence	XO Communications	X		X			

ITEM No. 4

REQUEST: Parties to discuss new benchmarks/intervals for measures impacted by email/non-mech ordering process.

RESPONSE: The parties have discussed new benchmarks/intervals for the O-8 (Reject Interval) and O-9 (Firm Order Confirmation Timeliness) measurements and have reached agreement to the following changes.

O-8 (Reject Interval)

Current: Non-Mechanized: 95% \leq 18 business hours

Revised: Email: 95% \leq 14 business hours

O-9 (Firm Order Confirmation Timeliness)

Current: Non-Mechanized: 95% \leq 24 business hours

Revised: Email: 95% \leq 17 business hours

The parties further agree for O-11 (Firm Order Confirmation and Reject Response Completeness) to change "Non-Mechanized" in the SQM Level of Disaggregation to "Email".

ITEM No. 7

REQUEST: Identify, based on AT&T info, prequalified loops for DSL (copper retirement)

RESPONSE: AT&T does not have an EDI order reject that identifies a reject due to the lack of copper facilities due to retirement. Further, CLECs have not been able to locate any data from AT&T databases that would identify fiber presence. Therefore, CLECs continue to request a separate level of disaggregation for orders rejected due to copper not being available.

ITEM No. 8

REQUEST: Proposed benchmark and rationale: Local Interconnection Trunks

RESPONSE: Staff asked CLECs to develop a proposal for the product disaggregation for local interconnection trunking for metric P1 (held order interval). In addition, during review of P1, we double checked the product disaggregation for local interconnection trunking for metric P3 (Missed Installation Appointments). CLECs advocate a change to the trunking disaggregation from parity to a benchmark as described below.

P1 (held order interval)

Proposal for Local Interconnection Trunks:

CLECs recommend the product disaggregation for local interconnection trunks be changed to a benchmark as follows: No more than 2% of total orders submitted during the reporting period to establish new local interconnection trunks or augments shall be held for 5 days or more due to lack of facility availability (includes trunk port terminations and facilities used for DEOT or Tandem connectivity).

Rationale:

AT&T's proposed language is to make a direct comparison with its own trunking related capacity comparisons. However, given that there are far fewer CLECs in the marketplace contending for trunk capacity resources, and given that quarterly AT&T subscriber line counts continue to decrease for wire line services, AT&T's network should have enough excess capacity on-hand in which to fulfill CLEC orders on a high percentage basis.

P3 (missed installation appointments)

Proposal for Local Interconnection Trunks:

CLECs previously agreed to parity for interconnection trunking based upon AT&T's agreement to strike the direct comparison method. Upon reconsideration however, we recommend the product disaggregation for local interconnection trunking be changed to a benchmark as follows: Not more than 5% of total orders submitted to establish new local interconnection trunks or augments during the reporting period will miss the customer requested due date.

Rationale:

There are far fewer CLECs in the marketplace placing orders to establish or augment local interconnection trunking, combined with the decline of AT&T subscriber line counts for wire line services creates a surplus of network facility capacity needed to fulfill CLEC orders within AT&T's standard published intervals for local interconnection trunking.

ITEM No. 9

REQUEST: Number of orders in UNE Other Design and UNE other Non-Design categories.

RESPONSE: Cbeyond reviewed August and September 2009 Raw Data for P-5 (Average Completion Notice Interval) to find circuits that fall under UNE Other Design or UNE Other Non-Design. Cbeyond does have some circuits under the UNE Other Design disaggregation.

August 2009:

- 7 circuits with USOC = UNC3X and Product ID 610
- 1 circuit with USOC = U1TD3 and Product ID 180

September 2009:

- 1 circuit with USOC = UNC3X and Product ID 604
- 1 circuit with USOC = UNC3X and Product ID 610

Accordingly, Cbeyond and CLECs disagree with AT&T's position/rationale that "discontinuing the production of these disaggregations will have no impact on results." Granted, a small number of circuits may be involved, but the results are important to CLECs and the affected end-users.

ITEM No. 12

REQUEST: Data to support proposed performance measure "Avg. Time to Update 911."

RESPONSE: While CLECs do not have specific concerns at this time with AT&T's performance on the proposed 911 SQMs, the CLECs have general concerns about the upcoming OSS releases. Given the last disastrous transition, more scrutiny should be given to these 911 measurements, as they have the possibility of affecting "life and limb." CLECs request that AT&T address the following questions:

- What if the address is wrong in the database? What could happen to affected consumers trying to dial 911 if it is programmed incorrectly?
- What is the responsibility/liability for each company to provide accurate records to emergency officials?
- What if AT&T starts under-performing in these areas? The Commission and CLECs would not know it until it was too late lawsuits were filed.
- What harm is there in having diagnostic measurements to at least be able to monitor performance in this area that has critical consequences for poor performance (especially since AT&T still has these 911 SQMs in their other states)?
- Why wouldn't AT&T want to protect itself and end users (as well as CLECs)?

ITEM No. 17

REQUEST: Are CLECs in agreement with the reporting structure?

RESPONSE: CLECs agree to the report structure with one exception. CLECs propose to change the reporting structure for M&R 3 as follows:

CLECs recommend the product disaggregation for local interconnection trunks be changed to a benchmark as follows: Service affecting trunk groups ≤ 1 hour for tandem groups, and ≤ 2 hours for non-tandem groups.

Rationale:

ATT currently has metric #77 in Texas that has this benchmark standard and structure for restoration of local interconnection facilities.

ITEM No. 18

REQUEST: CLECs in agreement with AT&T's proposal?

RESPONSE: CLECs understood the proposal was to leave the Billing Metrics as is, with no other conditions or terms. CLECs accept this proposal.

ITEM No. 22

REQUEST: Review and propose consolidation of CM measures.

RESPONSE: CLECs maintain that the time for revising the Change Management SQMs is not now. It is inappropriate to make changes to the CM metrics in the current plan review cycle. A Task Group is working to combine the CCP and CMP processes and is just beginning its work.

Also significant to the issue is that OSS consolidations and migrations remain pending until after the first quarter of 2010. CLECs have agreed to remove the CM-7 (Change Requests Accepted or Rejected within 10 Business Days) and CM 11A (Average Time to Implement Process Change Requests) metrics.

CLECs believe that under the circumstances, those concessions go far enough.

ITEM No. 28

REQUEST: Review for possible deletion of measure (CM 10).

RESPONSE: CLECs wish to retain the CM 10 (Software Validation) SQM. This measures software validation results for production releases. CLECs do not have visibility into all found software errors today.

CLECs would like to see the internal log of software changes and compare to the Type 6 defect report (EDR). The ERD Report dated 11/23/2009 (post November release) indicates 24 open software defects, of which 14 (or 58%) are in the SE Region. It should be noted that CR 2573 has been open since 8/5/2008 and is "targeted" for fix in March 2010. Given the fact that capacity was not used by the CLECs for Type 5 CRs, it is difficult to understand the delay of over 60 weeks in getting this defect resolved.

ITEM No. 29

REQUEST: Review change requests implemented in past 12 months that should be included in CM-11

RESPONSE: The Change Control Web site does not allow visibility into the Type 2-5 CRs in the nine states. AT&T has not issued the Release 32.0 Detailed Capacity report but CLECs have requested it. Furthermore, the Accessible Letter website is down until 12-7-2009, and while CLECs do not recall being notified of this outage, CLECs cannot run searches just the same.

While CLECs do have some responsive information, rather than file a partial and incomplete response, CLECs will require more time to respond. CLEC intend to respond by December 3, 2009, assuming CLECs have sufficient information from AT&T before then.

ITEM No. 31

REQUEST: Proposed revised language for Appendix B, Dispute Resolution.

RESPONSE: CLECs propose the following Dispute Resolution language:

This SQM Plan and the related self-effectuating enforcement mechanisms (SEEM) plan are not intended to limit any provision or provisions in an Interconnection Agreement between AT&T and a CLEC. If a dispute arises regarding the SQM or related SEEM payments, the Parties in dispute shall negotiate in good faith for a period of thirty (30) days to resolve the dispute. If at the conclusion of the 30 day period the Parties are unable to resolve the dispute, either Party may seek to have the dispute resolved in accordance with the dispute resolution provisions of the Parties' interconnection agreement.

ITEM No. 32

REQUEST: Revise joint language for Appendix F PMAP Notification.

RESPONSE: The parties have reached agreement to the following changes to the October 30 Joint Position Matrix.

Appendix F: AT&T Data Notification Process

1. On the first business day of the month preceding the data month for which AT&T proposes to make any change to the method by which its performance data is calculated, AT&T will provide notice of any change to the method by which its performance data is calculated. These changes (hereinafter referred to as "Data Notification Changes") will be published and viewable on the AT&T performance measurement website within the Exhibits/Data Notification section. This notice will identify the affected measure(s), describe the proposed change, provide a reason for the proposed change, and outline its impact.
2. No later than fifteen (15) business days after Data Notification Changes are published by AT&T, affected parties must file comments with AT&T to the extent they have objections or concerns about the Data Notification Changes.
3. AT&T will conduct an industry conference call with the affected parties to resolve objections or concerns no later than the 5 business days after written comments are received.
4. The Data Notification Changes set forth in the written notice referenced above would be presumptively valid and deemed approved effective thirty (30) calendar days after that notice on undisputed items. Items under discussion will remain open until agreement is reached by the affected parties.

ITEM No. 33

REQUEST: Discuss necessity of special access diagnostic measures

RESPONSE: AT&T has stated publicly that it is no longer willing to include custom SLAs (Service Level Agreements) which included performance measures and payment plans in the commercial Price Flex agreements it "negotiates" with CLECs. The Price Flex agreements offer discounts for special access services and have contained SLAs and payment plans in the past. Additionally, unlike Verizon, AT&T does not have broad SQMs in their federal special access tariffs. Furthermore, AT&T has stated it is not willing to commit to providing the same level of service to the CLECs as it expects from CLECs when CLECs provide special access services to AT&T. AT&T has also stated that CLECs should expect that AT&T's performance on special access to drop next year due to layoffs.

Since CLECs purchase special access to deliver local exchange service and there appears to be no other way to ensure the quality delivery of special access services, the FPSC needs to be concerned about monitoring the performance levels for special access as well as UNEs. The provision of underlying facilities at specified quality levels is important to the success of the wholesale market, and ultimately, to the service that CLECs provide to their end users - whether those underlying services are purchased as UNEs or special access. Ironically, CLECs pay more for special access services because such services are supposed to be delivered with higher quality service levels. There were assurances from AT&T to deliver higher quality service, but, as noted above, AT&T has made it clear CLECs should not expect this going-forward.

For all of these reasons, the special access SQMs need to be retained in the Florida SQM plan. And, in the future, if the FCC does not choose to re-regulate special access, there may be a need to increase the number of special access SQMs in Florida.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by E-mail this 24th day of November, 2009:

<p>Adam Teitzman Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 ateitzma@psc.state.fl.us</p>	<p>E. Earl Edenfield, Jr. Robert Culpepper c/o Gregory Follensbee AT&T/AT&T Florida 150 South Monroe Street, Ste 400 Tallahassee, FL 32301 kip.edenfield@att.com</p>
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