



OPASTCO



Action Item: Wireline to Wireless Local Number Portability

Under the Telecommunications Act of 1996, customers are permitted to maintain their existing telephone number when they switch from one service provider to another. This ability is called “number portability.” The Federal Communications Commission (FCC) worked extensively with an expert advisory body, the North American Numbering Council (NANC), to establish rules and procedures to ensure that the porting of numbers would occur in an accurate and timely manner. OPASTCO holds a seat on the NANC and actively participates in its deliberations.

Current FCC rules, developed in conjunction with NANC recommendations, require that ports from wireline carriers to wireless carriers occur within four business days. This porting interval was established based upon the different numbering systems that wireline and wireless networks use. However, in 2008, citing “technological advances” of number porting systems, the FCC tentatively concluded that the porting interval should be shortened from four business days to 48 hours.

While large carriers’ porting systems are now typically automated, many rural ILECs maintain manual porting systems due to the fact that they have few, if any, porting requests from customers. These manual systems are not capable of accurately and consistently porting numbers within a 48-hour time frame.

Specifically, NANC has advised the FCC that in order to support a shorter porting interval, rural ILECs would “need to change internal operating software, business practices, and implement mechanized systems and automated interfaces with other carriers.” Given the high costs of automation, and the low volume of porting requests, these upgrades are economically infeasible for many rural ILECs.

In the event that the FCC shortens the porting interval, an exception should be made for rural ILECs that lack automated porting systems. This would not exempt rural

ILECs from porting their customers’ numbers. It would simply maintain the current four-business-day porting interval. This exemption would affect very few customers, as rural ILECs serve less than seven percent of access lines nationwide, and only a very small percentage of these customers have ever requested a number port.

Rural ILECs would not be able to implement shorter porting intervals without incurring vastly disproportionate costs that would ultimately be born by consumers. Rural carriers, with their small staffs and geographically large, sparsely populated service territories, are ill-suited to the wholesale revamping of recordkeeping, staffing, and training that would be needed to accommodate faster porting. Therefore, the current four-business-day interval should remain in place for rural ILECs.

Congress should encourage the FCC to maintain the current four-business-day porting interval for rural ILECs.

Congressional offices are encouraged to write the FCC, noting WC Docket No. 07-244, to indicate support for retention of the four-business-day porting interval for rural ILECs.

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