Matt Kohly

From: lnpa-bounces@listserv.neustar.biz on behalf of gary.m.sacra@verizon.com
Sent: Friday, June 08, 2007 1:47 PM
To: lnpa@listserv.neustar.biz
Subject: [Lnpa] LNPA WG Action Iitem 0507-05

LNPA WG,

The attached PIM 60, the following associated Action Item 0507-05, and our next steps, will be discussed on our June 12th conference call.

Gary Sacra
LNPA WG Co-Chair

(See attached file: PIM 60.doc)

Action Item 0507-05: Regarding the attached PIM 60 submitted by Socket Telecom, Gary Sacra, LNPA WG Co-Chair, will add, "This customer will be served out of the Socket FX tariff" to Bullet 5 below. These bullets serve as the agreed-upon caveats in order for the LNPA WG to consider the port request outlined in PIM 60 to be a legitimate request.

- The Socket customer would like to receive calls to their Willow Springs number (s) at a location of theirs that is physically outside of the Willow Springs Rate Center.
- The customer understands that these numbers must continue to be rated as Willow Springs numbers and does not want them to take on the rating characteristics of the Rate Center of their new location.
- Socket already serves the Willow Springs Rate Center out of the same switch to which they want to port this customer's Willow Springs number(s).
- The Socket switch that already serves the Willow Springs Rate Center has an existing POI at the ILEC's tandem over which calls to Willow Springs-rated numbers are routed. If this customer's Willow Springs number(s) are ported into the Socket switch, they would be routed over the same POI, and then Socket would deliver the calls to the customer's premise that is located outside of the Willow Springs Rate Center.
- Socket has a tariffed Foreign Exchange (FX) service that would cover this situation. Calls to and from customers located in the Willow Springs exchange and the customer served by Socket will be routed exactly the same whether Socket assigns the customer a phone number from its 1K block of Willow Springs numbers or whether Socket ports the numbers.
- The LSR submitted by Socket reflects the customer's original service location as recorded by the Old SP.

Schedule MK-22

6/25/2007

LNP Problem/Issue Identification and Description Form

Submittal Date (mm/dd/yyyy): _03___ / _07___ / _2007___   **PIM 60**

Company(s) Submitting Issue:_Socket Telecom, LLC_____

Contact(s): Name ____Matt Kohly_____

          Contact Number 573_/_777_/_1991, ext. 551___ ___

          Email Address rmkohly@sockettlecom.com_____

(NOTE: Submitting Company(s) is to complete this section of the form along with Sections 1, 2 and 3.)

1. Problem/Issue Statement: (Brief statement outlining the problem/issue.)

Socket Telecom ("Socket") is attempting to port numbers away from a LEC to serve a customer that wishes to change its local service provider. Socket will be replacing the customer's current local exchange service with a tariffed Out of Calling Scope Service (either Remote Call Forward or Foreign Exchange Service) in conjunction with Socket's local exchange service. The LEC that is currently serving the customer is refusing to port the number on the grounds that the definition of number portability as defined in Section 147 U.S.C. 151 (30) is specifically defined as excluding attempts to change the serving location of the customer. The LEC is calling this "location portability" and is taking the position that it has no obligation to port a number if the customer's service location will change as a result of the number port.

2. Problem/Issue Description: (Provide detailed description of problem/issue.)

A. Examples & Impacts of Problem/Issue:

Socket is currently attempting to serve an Internet Service Provider that is trying to switch service providers in the Willow Springs exchange in Missouri. The customer wants to retain its current phone number as part of the change in service providers.

To meet the customer's request, Socket placed an order to port that customer's phone number using a coordinated hot cut[1]. The customer's current LEC placed the order in "Unworkable Status" and is refusing to port the Customer's number. When asked why they are not required to port the number, the response given is that it believes this port involves Location Portability as described above; it is not required to port this number. The LEC is basing its opinion that location portability is involved on the fact that the customer's service location will change as a result of the port.

Socket and LEC currently have an Interconnection Agreement that provides for the exchange of traffic, including the points of interconnection, and the rating and routing of traffic.   As the traffic rating and routing does not change as a result of the port, it is Socket's view that this port does not involve geographic or location portability.

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[1] Socket previously placed an order to port the number using the automated Ten Digit Trigger (TDT) method. Socket received a Firm Order Commitment within 24 hours. The LEC did not challenge the port in NPAC. On the due date of the port, Socket was contacted and informed that the ILEC would not port the number because it lacked sufficient facilities to transport calls to that number to the POI. At the time, Socket had already completed the port at NPAC. When companies met subsequently to address the facility issue, the LEC stated that a TDT could not be used for this port. Additionally, Socket was informed that the LEC believed this port involved Location Portability and that it had no obligation, under Applicable Law, to port that number. To date, this port remains completed at NPAC but the LEC is not routing non-queried calls to Socket for delivery to the customer.

It is true that the service location of the customer will change as a result of the port as Socket will replace the customer's current local service with a tariffed Foreign Exchange component as part of the local exchange service it provides[2]. Socket does not believe that service location is relevant to the issue of location portability or a carrier's obligations related to number portability. The customer's current phone number will retain the same call rating properties as it has prior to the port. In other words, the customer will retain the same local calling scope. As such, calls currently placed to the customer that are rated as local prior to the port will continue to be rated as local after the port. Call routing will change as a result of the number port due to the fact that the LEC serving the customer has changed. However, the new call routing will be same whether Socket provides loop facilities to the physical location of the customer or replaces the customer's service with a service that has a Foreign Exchange component. In addition, traffic to the customer will route in the same manner regardless of whether Socket is able to port the customer's current phone number or issues the customer a new number from Socket's existing numbering resources assigned to the Willow Springs exchange. In all instances, traffic will be exchanged between the LEC and Socket through the points of interconnection as required by the two companies' interconnection agreement. The location of the point of interconnection is the same regardless of whether the number is ported or Socket issues a new number to the customer.

As the customer's calling scope as well as traffic rating and routing does not change as a result of the port; it is Socket's view that this port does not involve geographic or location portability.

B. Frequency of Occurrence: ____ Each time Socket Telecom attempts to port a number that this LEC believes will result in Location Portability. This has happened several times in the past and is expected to be an ongoing issue until it can be resolved.

C. NPAC Regions Impacted:
Canada___ Mid Atlantic ___ Midwest_X_ Northeast___ Southeast___ Southwest___ Western___
West Coast___ ALL___

D. Rationale why existing process is deficient:
_____n/a_____

E. Identify action taken in other committees / forums:
_____none_____

F. Any other descriptive items:

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[2] While it may be generally presumed that a customer's rate center designation will correspond with the customer's physical location, Section 2.14 of Central Office Code Assignment Guideline published by ATIS recognizes that services such as Foreign Exchange Service are exceptions to this general premise

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3. Suggested Resolution:

Socket is not seeking to have this particular dispute resolved by the LNPA working group. Instead, Socket would like a recommendation from the LNPA working group as to whether the port described above constitutes geographic or location portability and whether, in the its opinion, a LEC is required to port the number in the situation described above.

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<u>LNPA WG:</u> (only)
Item Number: PIM 60
Issue Resolution Referred to: _____
Why Issue Referred: _____
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