

Socket Telecom

Number Portability Presentation
To LNPA-WG
March 13, 2007

The Issue

Is a LEC obligated to port a customer's number if the customer's existing service is being replaced by a service that includes an Out-Of-Calling Scope (FX or Remote Call Forward) component resulting in a change in service location but no change to call rating/routing or calling scope?

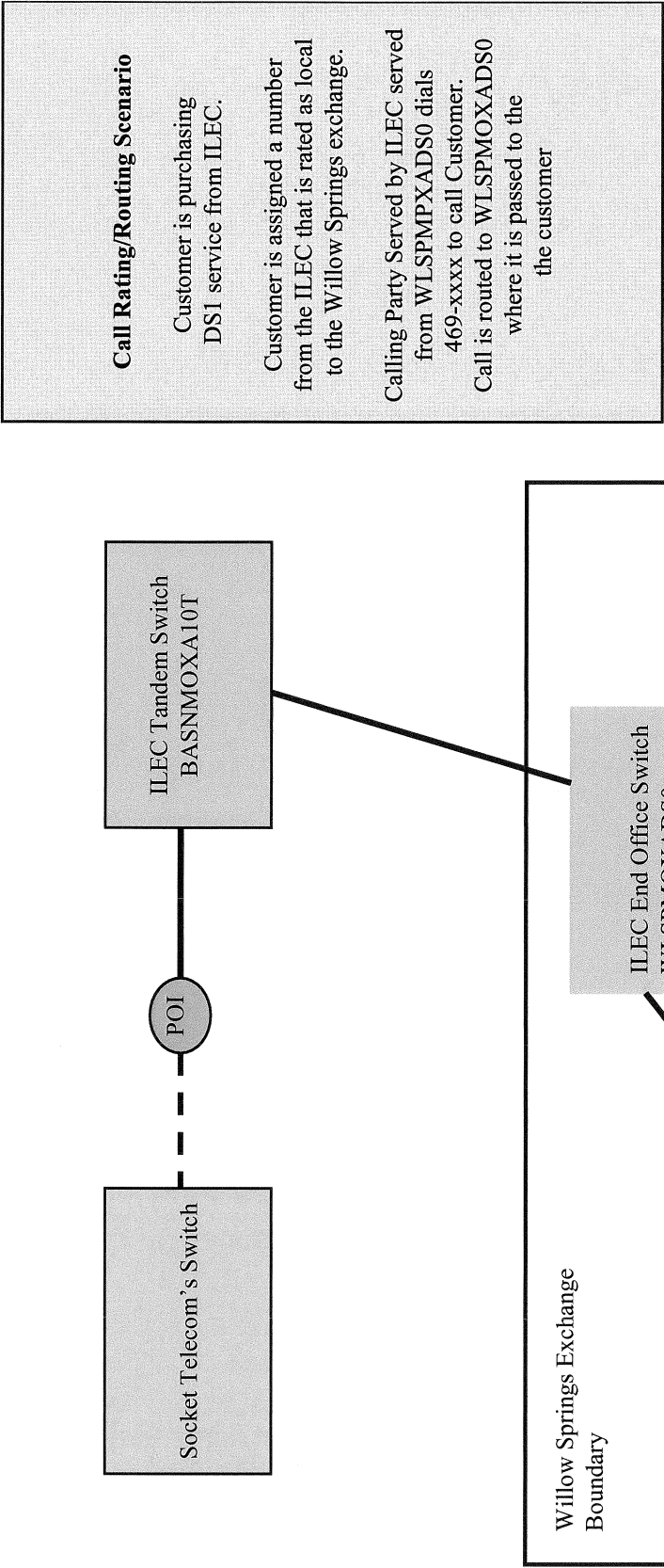
Two Possible Outcomes

- Socket's position is that a carrier is obligated to port a customer's number in this case since the customer will retain the same local calling scope, the customer's number will remain assigned to the same rate center before and after the port, and call routing will be same whether the new CLEC assigns its own number or ports the customer's existing number away.
- Another LEC has taken the position that it is not obligated to port the number is this situation because the customer's service location will change as a result of the port. This position is based upon the definition of Local Number Portability, which it believes restricts number porting obligations only to instances where the customer's service location remains the same.

Five Scenarios for Serving Customer

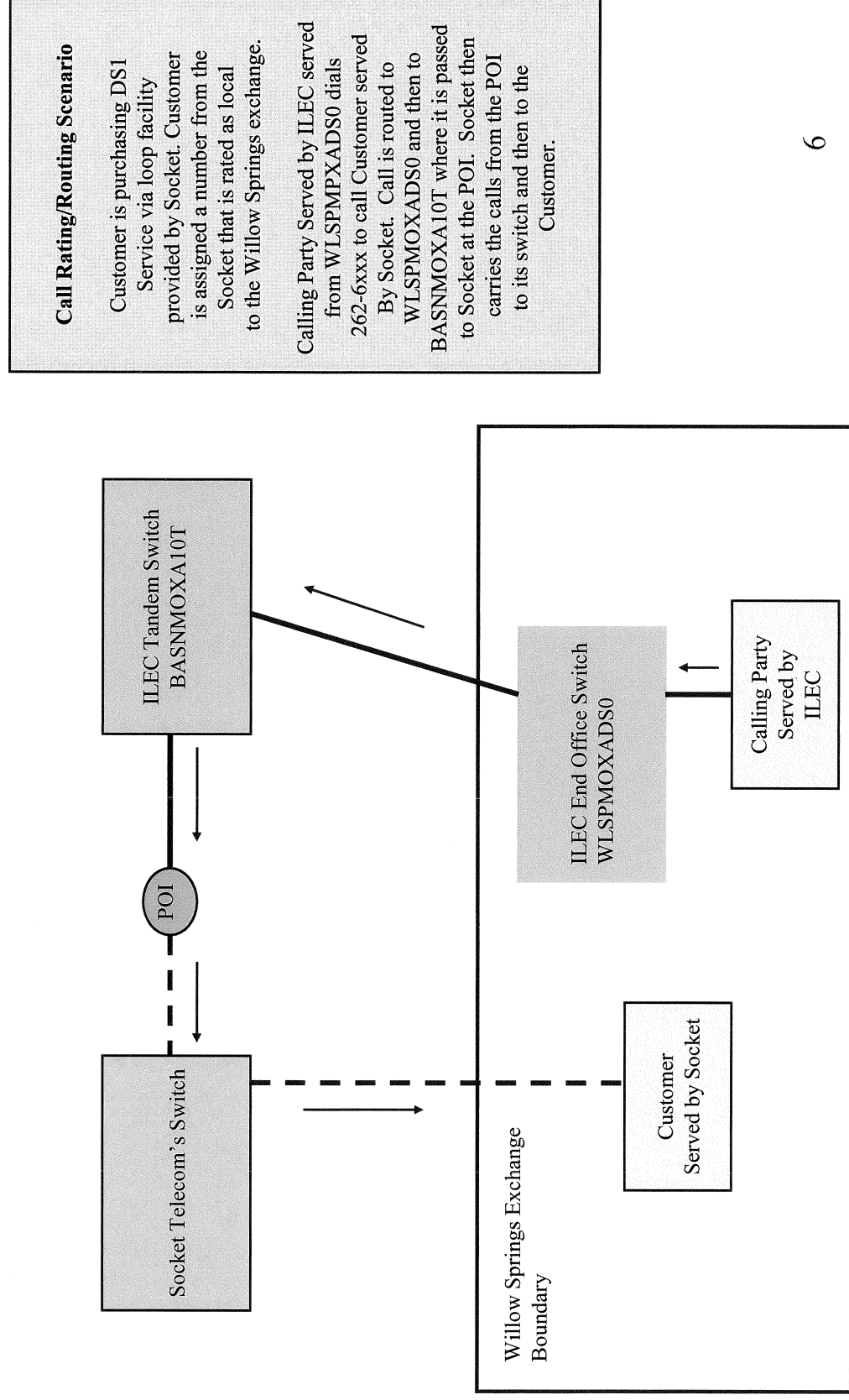
- **Scenario 1: Call Routing/Rating Scenario where Customer is served by ILEC**
- **Scenario 2: Call Routing/Rating Scenario where Customer is served by Socket via a Socket issued number and Socket provided Loop facilities to WLSPMOXA**
- **Scenario 3: Call Routing/Rating Scenario where Customer is served by Socket via a ported number and Socket provided Loop facilities to WLSPMOXA**
- **Scenario 4: Call Routing/Rating Scenario where Customer is served by Socket issued number and Socket provides service via a Foreign Exchange service**
- **Scenario 5: Call Routing/Rating Scenario where Customer is served by a ported number and Socket provides service via a Foreign Exchange service**

Scenario 1: Call Routing/Rating Scenario where Customer is served by ILEC

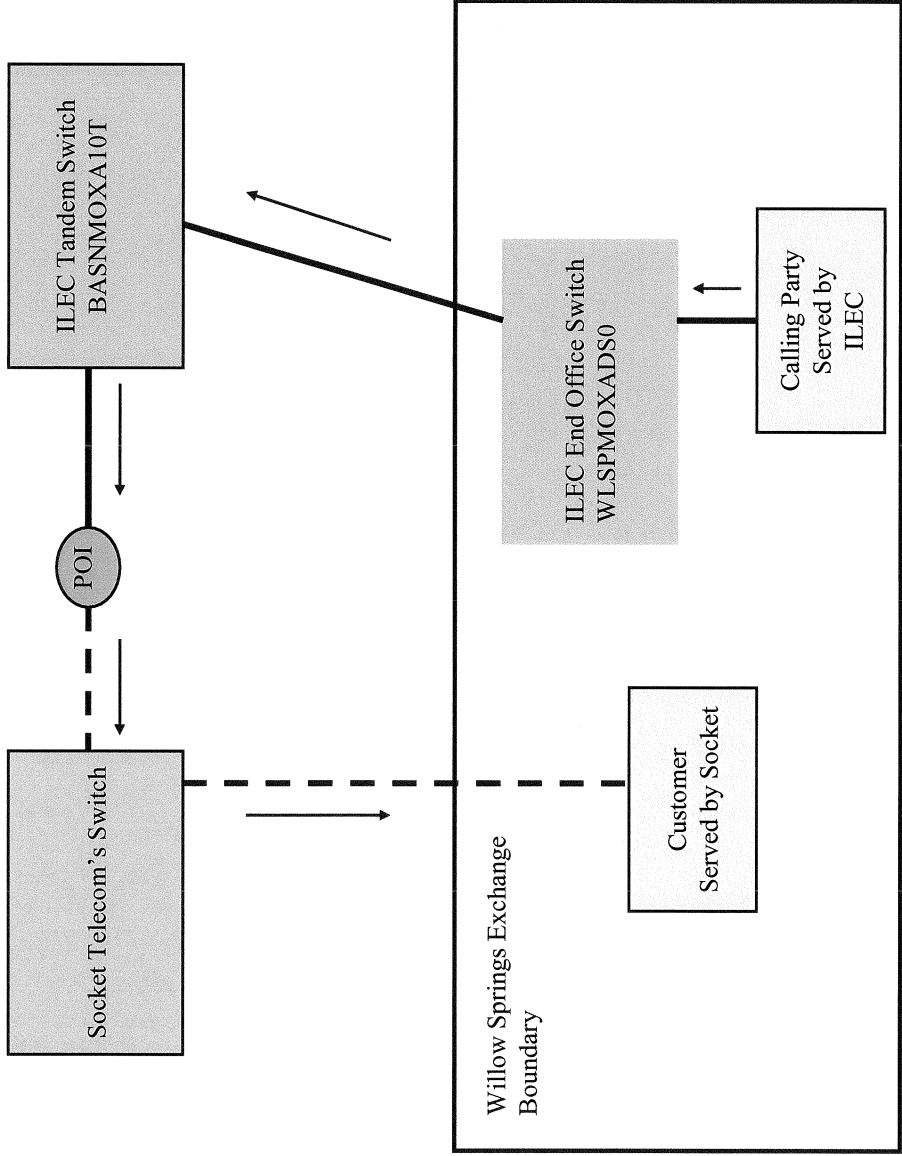


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Scenario 2: Call Routing/Rating Scenario where Customer is served by Socket via a Socket issued number and Socket provided Loop facilities to WLSPMOXA



Scenario 3: Call Routing/Rating Scenario where Customer is served by Socket via a ported number and Socket provided Loop facilities to WLSPMOXA

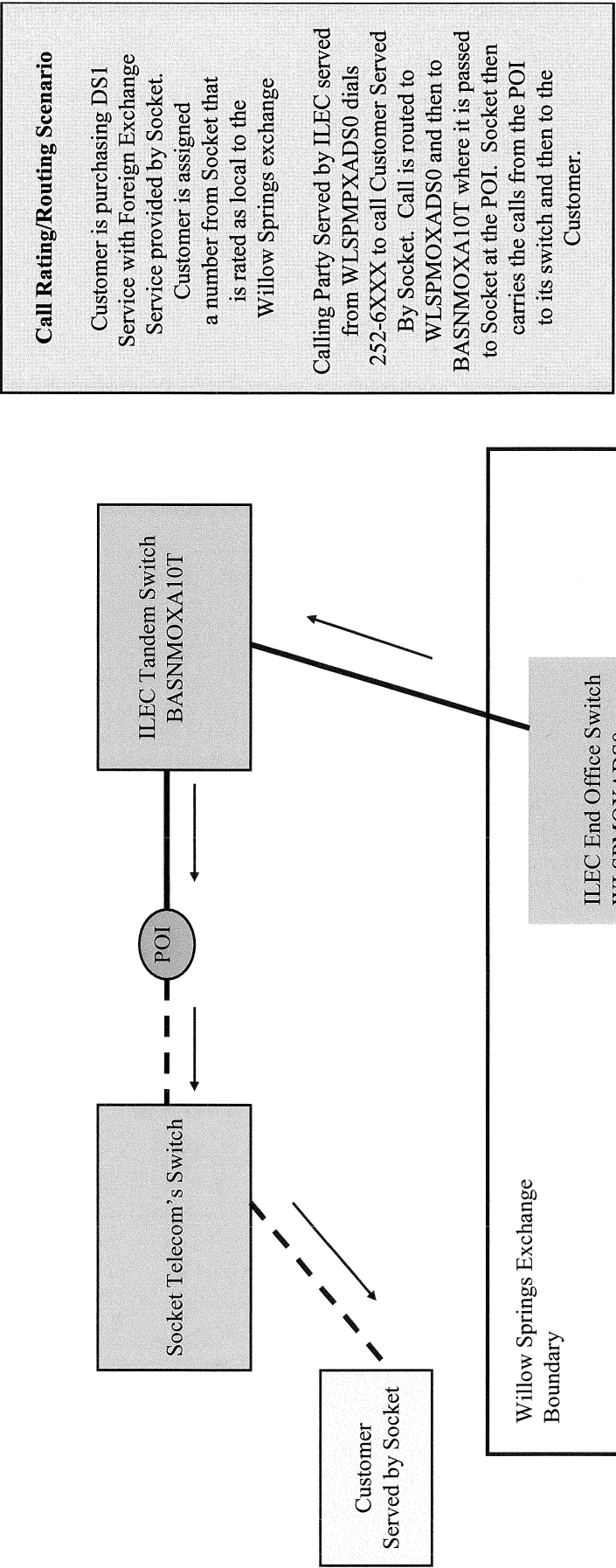


Call Rating/Routing Scenario

Customer is purchasing DS1 Service via Loop Facility Provided by Socket. Customer Retains its ported number that is rated as local to the Willow Springs exchange.

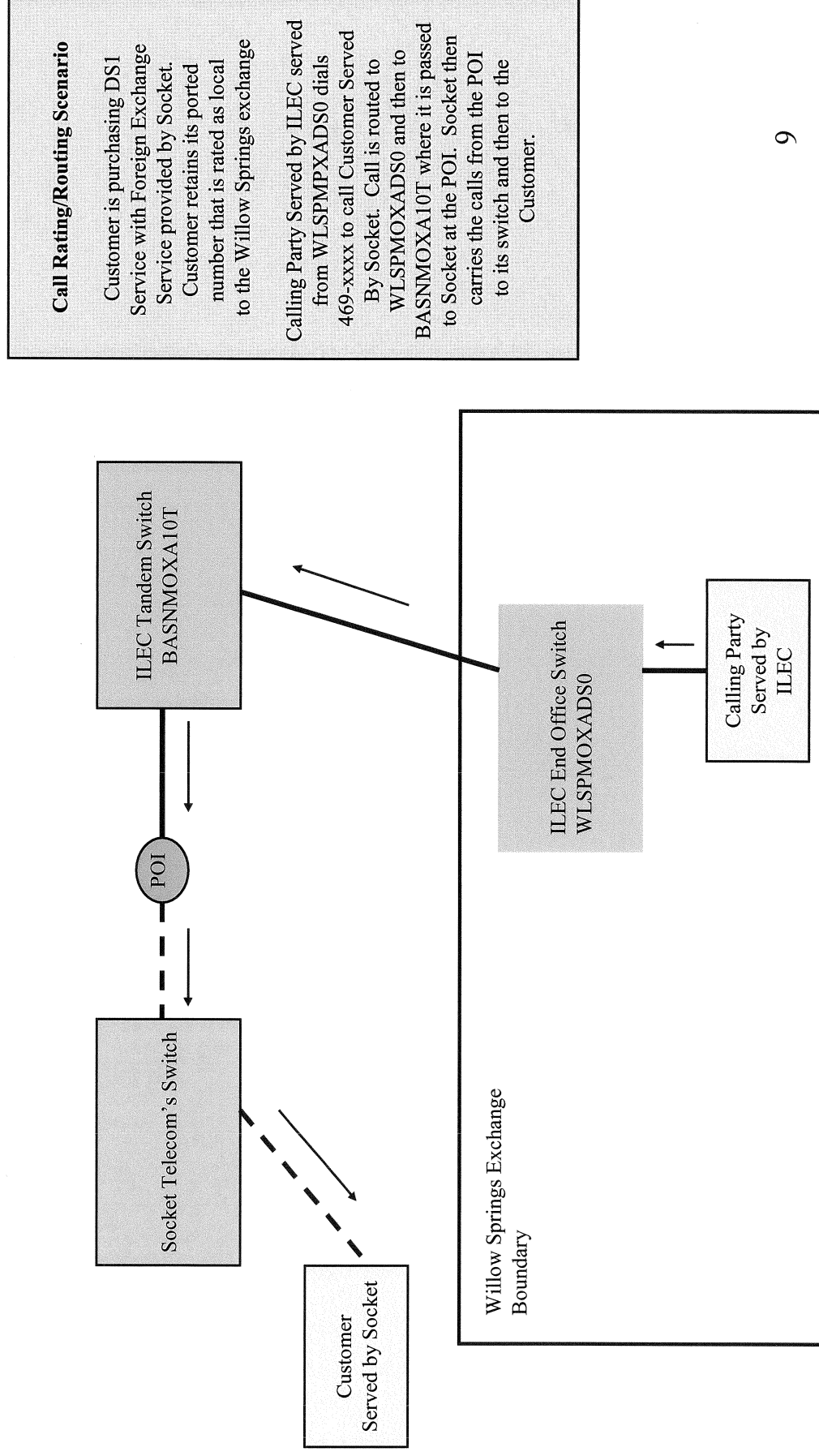
Calling Party Served by ILEC served from WLSPMPXADS0 dials 469-xxxx to call Customer served by Socket. Call is routed to WLSPMOXADS0 and then to BASNMOXA10T where it is passed to Socket at the POI. Socket then carries the calls from the POI to its switch and then to the Customer.

Scenario 4: Call Routing/Rating Scenario where Customer is served by Socket issued number and Socket provides service via a Foreign Exchange service



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Scenario 5: Call Routing/Rating Scenario where Customer is served by a ported number and Socket provides service via a Foreign Exchange service



Calling Scope and Call Rating

- In each Scenario, the Customer's phone number is assigned to the Willow Springs (WLSPMOXA) exchange.
- Calls to Customer's ILEC-issued or CLEC-issued phone number from other phone numbers assigned to the Willow Springs exchange are rated as local calls.
 - This occurs regardless whether the Customer is served
 - By ILEC or Socket
 - By Loop Facilities provided by Socket to Willow Springs or via an FX Arrangement
- Bottom Line: Neither the Customer's Rate Center Designation or Call Rating change as a result of the number port.

Call Routing

- As with any number port, Call Routing will change when a number is ported.
 - In ILEC Scenario (Scenario 1), calls stay within ILEC's network.
 - In Socket Scenario (Scenarios 2 – 5) calls are routed by ILEC to Socket through the Point of Interconnection.
- In Socket Scenarios (Scenarios 2 – 5) Call Routing Remains the Same Regardless of the use of ported numbers or provision service via a Foreign Exchange arrangement.
- Bottom Line: Call Routing is the same whether Socket issues a new phone number or is able to port the existing phone number.

Regardless of Scenario, ILEC and CLEC Interconnection Obligations Remain the Same

- With Socket-issued phone number, the ILEC transports its customer's originating calls from Willow Springs to the Point of Interconnection (POI). Socket transports that call from the POI to its switch and then routes that call to its customer.
- With ILEC-ported phone number, the ILEC transports its customer's originating call from Willow Springs to the POI. Socket transports that call from the POI to its switch and then routes that call to its customer.

Why does Socket believe a change in service location in this instance does not alleviate a carrier's obligation to port a customer's number?

- LNP rules and documentation addressing porting obligations focus on promoting competition and making changing service providers as convenient as possible for customers.
- Limitations on number porting obligations generally hinge on technical feasibility issues.
- Porting a number in this situation is technically feasible
 - As long as call routing and rating do not change, porting the number is technically feasible.

Why does Socket believe a change in service location in this instance does not alleviate a carrier's obligation to port a customer's number?

- Socket's rate center designation/call rating is consistent with Central Office Code Assignment Guidelines published by ATIS
 - With Wireline Services, it is generally presumed that a customer's rate center designation will correspond with the customer's physical location.
 - However, 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.

Why does Socket believe a change in service location in this instance does not alleviate a carrier's obligation to port a customer's number?

- In addressing location portability in the context of wireless-wireline portability, the FCC focused on the following
 - The customer retains the same rate center designation
 - Calling Rating remains the same
 - Call Routing remains the same whether the new carrier assigns a new number or ports the number from the previous carrier.
- The FCC determined that as long as this criteria was met, carriers were required to permit the customer to port his/her phone number.

See FCC 03-284, CTIA Petitions for Declaratory Ruling on Wireline -Wireless Porting Obligations, MEMORANDUM OPINION AND ORDER AND FURTHER NOTICE OF PROPOSED RULEMAKING, Nov. 10, 2003, Para. 28

Why does Socket believe a change in service location in this instance does not alleviate a carrier's obligation to port a customer's number?

- The facts in this situation are consistent with past FCC determinations that carriers are obligated to permit numbers to be ported under the following conditions -
 - The customer's service location changes
 - The customer retains the same rate center designation
 - Calling Rating remains the same
 - Call Routing remains the same whether the new carrier assigns a new number or ports the number from the previous carrier.