

**From:** Deborah Blue [mailto:Deborah.Blue@fcc.gov]

**Sent:** Monday, October 29, 2007 11:24 AM

**To:** aneboyle22@cox.net; anewman@telcordia.com; alee@ntia.doc.gov; amy.putnam@neustar.biz; Robyn, Angie; Ann Stevens; anna.miller@T-Mobile.com; bethodonnell@comcast.net; bill.mason@crtc.gc.ca; cjackson@our.org.jm; Ccox1@chartercom.com; Christi Shewman; Christopher.Littlewood@Level3.com; Deborah Blue; Don.Gray@psc.ne.gov; doug.birdwise@bell.ca; fmarcotte@welchandco.ca; gsteeler@welchandco.ca; gary.m.sacra@verizon.com; hmm@cpuc.ca.gov; hh8358@att.com; anne.boyle@psc.ne.gov; pjones@utc.wa.gov; Clayton, Robert; james.t.castagna@verizon.com; jpemard@atis.org; Jeffrey Steinberg; Jennifer Salhus; Jerome@calcable.org; john.manning@neustar.biz; jtm@opastco.org; jnr@opastco.org; jlee@comptel.org; joseph.r.jackson@verizon.com; Julie Veach; kreidy@comptel.org; Karen Riepenkroger (Karen.S.Riepenkroger@sprint.com); Hagans@occ.state.oh.us; ken.r.havens@sprint.com; Lmessaging@ctia.org; louis.mamakos@vonage.com; lynne.fancy@crtc.gc.ca; Marilyn Jones; Mary.Retka@qwest.com; melvin.clay@att.com; MAItschul@ctia.org; Michael Whaley (Mike Whaley@qwest.com); mike.balch@iub.state.ia.us; nxb@cpuc.ca.gov; natalie.mcnamer@t-mobile.com; paul.godin@crtc.gc.ca; paula.hustead@windstream.com; paula.jordan@t-mobile.com; Philip.w.harrington@verizon.com; rlstrass@nortelnetworks.com; rbeaton@utc.wa.gov; Rosemary.Emmer@sprint.com; Sue.T.Tiffany@sprint.com; tom@phoenix-center.org; tsoroka@usta.org; timothy.decker@verizon.com; tgoode@atis.org; william.vallee@po.state.ct.us

**Subject:** NANC - [Fwd: CenturyTel appeal of LNPA-WG action]

Council Members:

See message below and attachment from Chairman Koutsky.

Debbie

**From:** Tom Koutsky [mailto:tom@koutsky.com]

**Sent:** Friday, October 26, 2007 2:16 PM

**To:** Deborah Blue; Marcus Maher

**Subject:** [Fwd: CenturyTel appeal of LNPA-WG action]

NANC Members,

Yesterday, I received the attached letter from CenturyTel requesting that NANC delete a particular item (PIM-60, not issue 50) from the local number portability "best practices" document maintained by the LNP Working Group and that we follow appeal procedures set forth in 47 C.F.R 52.26(b)(3) on the matter. The issue relates to the local number portability process for tariffed foreign exchange services and was discussed and resolved by the LNP working group in several meetings from May-July 2007. It is my understanding that CenturyTel participated in those meetings and made its views on this issue known in that process. Nevertheless, the judgment of the LNP working group chairs was that consensus was reached on the issue. (As per Chapter 12 of the NANC Operating Procedures, "consensus" does not require "unanimity.")

NANC of course is an open body and our door is open at all times to requests by

members of the public, and the industry. I have been in contact with the LNPA WG chairs on this issue, and any one of you that are interested or have questions on this matter or how we should proceed should feel free to contact me.--TK

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October 25, 2007

North American Numbering Counsel  
c/o Thomas M. Koutsky, Chair  
Phoenix Center for Advanced Legal and  
Economic Public Policy Studies  
5335 Wisconsin Avenue, NW, Suite 440  
Washington, DC 20015-2034

**BY FIRST CLASS MAIL (CHAIR) AND  
ELECTRONIC MAIL (ALL COPIES)**

Dear Council Members:

CenturyTel, Inc., on behalf of its subsidiary operating companies,<sup>1</sup> hereby appeals the decision of the Local Number Portability Administration Working Group (“LNPA-WG”) that adopted as an industry “best practice” PIM-60 – a policy initiative requiring location portability for numbers that one CLEC with an ISP affiliate<sup>2</sup> and other ISP customers asked the LNPA-WG to adopt over the objections of a number of Incumbent Local Exchange Carriers (“ILECs”). CenturyTel respectfully requests that the Council remove the issue raised in PIM-60, now listed as issue 50, from the “best practices” list. If the North American Number Council (“NANC”) decides that it should promote location portability as a national policy issue, it should refer the matter to the Federal Communications Commission (“FCC”), as required by Section 52.26(d)(3) of the FCC’s rules. Furthermore, because of the egregious abuse of LNPA-WG processes identified with more specificity below, we urge NANC to focus on these illegal, discriminatory, and grossly unfair procedures, and bring them into compliance with the original mandate of the technical working group and NANC’s mission – to promote a

<sup>1</sup> CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel are the two subsidiary operating companies of CenturyTel, Inc. that are doing business in the state of Missouri and that are respondents in the complaint filed by Socket Telecom at the Missouri Public Service Commission (discussed herein). Hereinafter, these entities will be referred to collectively as “CenturyTel”.

<sup>2</sup> According to the Missouri Secretary of State’s Web site, Socket Holdings Corporation, f/k/a Socket Internet Services Corporation is the holding company for Socket Telecom, LLC. Socket Holdings Corporation does business as an ISP under the registered fictitious names of “Socket Internet, Inc.”, and “Socket Internet”.

North American Numbering Council  
October 25, 2007

neutral administrative body to oversee deployment of local number portability in accordance with FCC rules and guidelines.

**Background**

In October, 2006 Socket Telecom (“Socket”) requested that CenturyTel port a customer’s number to Socket’s service in a new geographic area that was not served by CenturyTel’s central office where the customer’s original telephone number was resident. Socket submitted a second location porting order for a different number in January, 2007. CenturyTel refused to port the numbers because that action constituted geographic or location number porting that had not been required by the FCC’s rules and was otherwise in violation of CenturyTel’s practices.

On March 19, 2007, Socket filed a formal complaint against CenturyTel with the Missouri Public Service Commission (“MPSC”) alleging that CenturyTel was obligated by law to port these numbers and that CenturyTel’s refusal was inconsistent with the interconnection agreements entered into between CenturyTel and Socket. The matter was assigned to a regulatory law judge, prefiled testimony was submitted by CenturyTel, Socket and the MPSC Staff, and a full evidentiary hearing was conducted on July 11-12, 2007, relating to the issues. Briefs were filed on September 10, 2007, and the record is now complete, awaiting a decision by the Commission.

Prior to filing the formal complaint and during the informal dispute resolution process between Socket and CenturyTel, Socket filed with the LNPA-WG an LNP Problem/Issue Identification and Description Form (designated as “PIM-60”), dated March 7, 2007. *See* Exhibit A. In PIM-60, Socket asked the LNPA-WG to adopt as an industry standard a requirement that an ILEC port a customer’s number when “the service location of the customer will change” using what it describes as Foreign Exchange (“FX”) service to deliver calls to the customer in the location outside the rating center of the ported number.

CenturyTel and other ILECs opposed the inclusion of PIM-60 as an industry “best practice” during the May, June and July meetings of the LNPA-WG. Despite these objections, the Chair of the LNPA-WG determined that there was a “consensus” on the issue and included it as a “best practice”. Unbeknownst to CenturyTel, the matter was submitted in a report of the LNPA-WG to NANC at a meeting held on October 10, 2007. Although an LNPA-WG report was listed on the agenda of the October 10 meeting, there was no indication in the public notice that the PIM-60 contested issue was the subject of such report. *See* FCC Announces the Next Meeting of the North American Numbering Council, DA 07-3887 (rel. Sept. 17, 2007). CenturyTel did not become aware of this presentation until Socket filed a pleading before the MPSC on October 17, 2007, a pleading that CenturyTel will strenuously oppose, asking that the record in the Missouri proceeding be reopened to purportedly demonstrate that PIM-60 had been adopted as an accepted industry practice, something which had never occurred prior to the time that the record in the

North American Numbering Council  
October 25, 2007

relevant case was closed in Missouri. The NANC apparently accepted the LNPA-WG report without discussion, although it is unclear whether it ever knew of the contested nature of the issue.

**PIM-60 Violates FCC Numbering Policies**

The LNPA-WG Chair's decision to include PIM-60 as an industry "best practice", radically redefines local portability obligations for ILECs because it is contrary to current law. Although 47 U.S.C. § 251(b)(2) requires all local exchange carriers to provide number portability, the Act defines number portability as "the ability of users of telecommunications services to retain, *at the same location*, existing telecommunications numbers." *Id.*, § 153(3)).

Pursuant to this statutory authority, the FCC refused to require carriers to port numbers when the customer's location changes because such result was determined to be contrary to the public interest at that time. *Telephone Number Portability*, CC Docket No. 95-116, 11 FCC Rcd 8352, 8447, ¶182 (1996) ("*First Report & Order*"). This refusal was also based on the disadvantages that location portability would create, including customer confusion caused by the current geographic association of numbers, and the inability of consumers to determine whether a particular call would involve toll charges. *Id.*, ¶ 184. This policy remains in place at both the federal and state levels.

PIM-60 permits a customer to keep his or her phone number when moving to a geographic location outside of the central office, or rating center, in which the customer originally was assigned a telephone number, provided that FX service is used and six specific criteria are met. Notably absent from the six criteria adopted in PIM-60 is any requirement that the porting-in carrier actually provide service in the geographic area of the original rate center. This is contrary to the FCC's consistent policy that the porting-in carrier provide service at the same location.<sup>3</sup>

See for example, the FCC's conclusion in its *Intermodal LNP Order* that the porting-in wireless carrier must first have coverage at the same geographic area where the original carrier provided service.<sup>4</sup> Absent a requirement that the porting-in carrier provide service at the same location, PIM-60 is contrary to the statute and FCC policy.

In order to effectuate this location portability for its own purposes, Socket portrayed its one-way Virtual NXX service as a type of FX service and attempted to create the artificial impression that the customer's geographic location has never changed

<sup>3</sup> CenturyTel believes that Socket Telecom is not serving any customers located in the exchanges at issue in the Missouri dispute.

<sup>4</sup> *Telephone Number Portability* CC Docket No. 95-116, 18 FCC Rcd 23697, 23706, ¶ 22 (2003) ("*Intermodal LNP Order*").

North American Numbering Council  
October 25, 2007

because the calling scope of the customer has not changed.<sup>5</sup> Unlike true FX service, Socket's service does not use a customer-paid private line between the original and new exchanges but rather it seeks to have the ILEC transport the calls without compensation between these different rate centers. Unlike true FX, Socket's method transfers the interexchange transport cost from the FX provider and its paying end user to a third party carrier, the ILEC, and denies the ILEC the right to collect the toll and access charges that normally apply to the switched interexchange transport of calls.<sup>6</sup>

**Adoption of PIM- 60 Violated FCC Procedural Rules**

Section 52.26(d)(3) of the Commission's rules provides:

Parties shall attempt to resolve issues regarding number portability deployment among themselves and, if necessary, under the auspices of the NANC. If any party objects to the NANC's proposed resolution, the NANC shall issue a written report summarizing the positions of the parties and the basis for the recommendation adopted by the NANC. The NANC Chair shall submit its proposed resolution of the disputed issue to the Chief of the Wireline Competition Bureau as a recommendation for Commission review.

The FCC procedure has not been followed in this case. Rather, the LNPA-WG, over the objections of numerous ILECs, placed the disputed policy issue in its "best practices" list and submitted that document in a report to the NANC without ever

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<sup>5</sup> Because Socket Telecom's service is primarily used for the one-way origination of its affiliate's ISP-bound traffic in the instances cited in the Missouri litigation, Socket's assertion regarding the calling scope not changing is disingenuous; there are rarely, if ever, any locally rated calls returning to the original exchange, only calls leaving the exchange to the now distant Socket customer.

<sup>6</sup> Socket Telecom has created a service for its ISP affiliate as well as other ISP customers, whereby end users originate one-way, outgoing interexchange traffic with no end user paying any fixed or usage-based rates for these interexchange calls, and the cost of the interexchange transport is foisted off without any cost recovery opportunity on the ILEC who serves the originating exchange. In practical terms, Socket's service is not "FX-like" but rather is identical in concept to 800 service with the sole exception of the originating end users dialing a seven-digit local number instead of an 800 number. The use of the seven digit local number allows the false claim that the calls are local in nature and not interexchange regardless of the interexchange termination point for the calls.

North American Numbering Council  
October 25, 2007

mentioning the controversy. NANC should delete PIM-60, which is classified as item 50 in the “best practices” list, and follow the procedures provided the FCC’s rules.

**The LNPA-WG is Not Authorized To Adopt PIM-60**

NANC was given its initial charter by the FCC to administer and oversee the local number portability process that was to be conducted by seven neutral regional database managers, which currently are run by Neustar, Inc. *Administration of the North American Numbering Plan*, 11 FCC Rcd 2588, 2609 (1995). At NANC’s first meeting, it created the LNPA-WG, which was ordered to provide an industry forum to resolve technical issues associated with the interaction between carriers in the local numbering portability process. Telephone Number Portability, CC Docket No. 95-116, 12 FCC Rcd 12281, 12289, ¶ 11 (1997) (“*Second Report & Order*”). The LNPA-WG’s charter provided its duties as follows:

2.2.1 The LNPA Selection Working Group was formed to address and to submit recommendations on all issues delegated to the NANC by the FCC regarding LNP administration.

2.2.2 At the initial LNPA Selection Working Group meeting, as part of the overview of the FCC LNP Order, the FCC staff presented a list of determinations left to NANC regarding LNP. The Working Group used this as the comprehensive list of determinations requiring review. Following is the list as presented by the FCC staff:

1. What neutral third party or parties will be the local number portability administrator(s);
2. Whether one or multiple LNPA(s) should be selected;
3. How the LNPA(s) should be selected;
4. Specific duties of the LNPA(s);
5. Geographic coverage of the regional databases;
6. Various technical standards, including interoperability operational standards, network interface standards, and technical specifications; and
7. Guidelines and standards by which the NANPA and LNPA(s) share numbering information.

*Id.* at 12290, ¶12, reproduced at [http://www.nanc-chair.org/docs/NANC\\_Training\\_Binder\\_-\\_031406.doc](http://www.nanc-chair.org/docs/NANC_Training_Binder_-_031406.doc).

PIM-60 addressed a policy issue concerning whether location portability should be required. Because this is a legal conclusion that is inconsistent with the statute and relevant FCC Orders it is inappropriate for a technical-standards body to address it.

North American Numbering Council  
October 25, 2007

Only the FCC is authorized to reach legal and policy conclusions based on a record that is adopted pursuant to Administrative Procedures Act requirements. Although NANC certainly is permitted to make recommendations on policy to the FCC, the LNPA-WG process is not the appropriate place for NANC to raise and decide such issues.

**The LNPA-WG Failed To Follow Its Own Procedures in Adopting PIM-60 Because No Consensus Was Reached**

The LNPA-WG failed to follow its own procedures in ignoring the vocal opposition to PIM-60 by ILEC interests. The LNPA-WG has established its own rules of procedure:

2.4 Assumptions and Processes

2.4.1 The LNPA Selection Working Group adopted the following working assumptions to govern the operation of the group:

- A. Membership in the Working Group adequately represents the industry.
- B. Membership and participation in meetings is unrestricted, but a given entity exercises only one (1) vote on any given issue.
- C. Decisions are reached by consensus, which does not require unanimous consent, but is not reached if the majority of an affected industry segment disagrees.
- D. Members elect co-chairs from the Incumbent Local Exchange Carrier (ILEC) and Competitive LEC (CLEC) segments of the industry to administer Working Group activities and determine consensus when required.
- E. Unresolved issues are escalated to the NANC Steering Committee and/or the full NANC when required.
- F. Only issues that fall within the scope of the LNPA Selection Working Group mission outlined in Section 2.2 are considered by the working group.

<http://www.fcc.gov/wcb/cpd/Nanc/wknggrp.doc>. In sum, the LNPA-WG operates by consensus, and any disputes must be raised to a higher authority within NANC.

No consensus was reached on PIM-60. The issue was raised by a single CLEC with an affiliated Internet Service Provider to aid it in pending litigation it was commencing at the MPSC. CenturyTel and other ILECs, the affected industry segment, vociferously objected to both the language of PIM-60 and the closing of the issue. *See Minutes of LNPA-WG meetings of May, June and July, 2007. See Exhibits B, C, and D.* Because attendance at the meetings is open to all and participation depends entirely on whether the scheduling is consistent with company personnel calendars, participants at these LNPA-WG meetings just happened to be



North American Numbering Council  
October 25, 2007

overwhelmingly from the CLEC and wireless industries, members who would be benefited by the policy decision contained in PIM-60 rather than members who would be affected. No attempt by the Chair was made to balance the various viewpoints held in accordance with the industry segments whose interests were being affected. No consideration was given to the fact that the issue was raised by a private litigant to aid its litigation efforts.

Chapter 12 of NANC's operating procedures provides:

### **Chapter 12 Consensus**

Ideally, every decision taken by NANC and its subsidiary groups will be made by unanimous consent. The Chair and Members should make reasonable attempts to achieve unanimity. However, a requirement of unanimity would make it impossible for NANC to make any controversial decisions since each Member would hold veto power.

When a decision must be made and unanimity is not possible, NANC decisions will be made by consensus. (This means that decisions are not made by simple majority voting.)

But, what is "consensus" and how is it determined?

Fundamentally, determining when consensus is reached is a judgment call to be made by the Chair. Included in the Chair's judgment are not just the numbers of Members "for" or "against" but, more importantly, the "weight" (i.e., the experience, reputation and knowledge) of each Member who is "for" or "against." Another judgment factor to be considered by the Chair is the intensity with which each Member's views are held.

The Chair cannot and should not attempt to determine when consensus is achieved by some sort of mechanical "objective" process. However, the following examples illustrate how the subjective decision might be made.

Each NANC Member earns his or her consensus "weight" through regular participation, expertise, collegiality and other factors valued by the Chair. Thus, if only one "heavyweight" – a very experienced, knowledgeable and fair person – was strongly against a decision, that might be enough to defeat consensus. Similarly, if a large number of "lightweights" (i.e., those who have earned little respect, rarely attend meetings or participate in them) attend a meeting and take one side of an issue and a similar number of "heavyweights" are on the other side, it would be reasonable for the Chair to find that the heavyweights' view constitute the consensus. Similarly, a smaller number of

North American Numbering Council  
October 25, 2007

heavyweight Members with intensely held views could constitute the consensus against weakly held views of lighter weight Members.

Because determining consensus is inherently a subjective judgment by the Chair, due process requires Members who are disappointed by the Chair's decision have an appeal. In NANC, any Member who disputes the finding of a "consensus" may bring their point of view to the next higher authority as a minority opinion. (The higher authority is the full NANC in the case of subsidiary groups' decisions and the FCC in the case of the full NANC's decisions). It is better for the higher authority to receive a "consensus" decision and one or more "minority" opinions than to have no recommendations at all. Indeed, having both "consensus" and "minority" views can be very valuable to the higher authority.

In summary, unanimity is ideal. When unanimity is impossible, anything other than the admittedly subjective consensus process runs the risk of gridlock. It is much better to present a disputed consensus.

NANC Final Operating Manual, Chapter 12 (Mar. 12, 2006). The manner in which the PIM-60 issue was railroad through the committee on the votes only of present participants that happened to be overwhelmingly representative of CLEC and wireless interests illustrates how a policy rule's beneficiaries can raise, vote on and create new and expensive obligations for their competitors: In this case CLEC and wireless carriers working to impose a self-serving obligation upon ILECs. An industry forum such as the LNPA-WG should not be allowed to set industry policy in the guise of "best practices" that negatively affect a competitive segment of the industry without the knowledge and full participation of that segment in the discussion and decision process.

The lopsided representation of CLECs and wireless carriers at those meetings is clear once the participant numbers and their representation are identified. By looking at the cover sheet of the attached meeting minutes, CenturyTel approximates that the representation of ILEC participants for PIM-60 discussions was as follows:

- *May meeting*: only 4 of 37 participating members were ILECs.
- *June meeting*: only 7 of 34 participating members were ILECs.
- *July meeting*: 3 ILECs objected to the LNPA-WG's recommended language for PIM 60 and 2 ILECs objected to closing PIM-60.

North American Numbering Council  
October 25, 2007

- A number of small rural Missouri ILECs sent a letter objecting to PIM-60 to the LNPA-WG. However, this letter was not considered by the LNPA-WG because they were not present.
- Finally, it is worth noting that although there are 8 ILECs listed on the roster for the July meeting, there only appeared to be about 5 ILECs participating at the time PIM-60 was discussed in the July meeting.

There was no “consensus” reached because no weighting was provided to the participant numbers. There was no reason to railroad the decision through. Avoidance of gridlock was not the issue on PIM-60. Rather, the issue was whether an overwhelmingly CLEC- and wireless carrier-dominated group could impose a change in policy issues over the objections of several ILECs, which were the companies that stood to be burdened by the change in policy. The Chair of the committee clearly erred in his finding of “consensus” and should have instead reported it to NANC, if at all, as a disputed policy issue that should be discussed at the Council level with resolution at the FCC.

#### **ILECs Will Be Negatively Impacted by PIM-60**

Notwithstanding the foregoing serious legal and procedural errors, the decision to adopt PIM-60 will adversely affect ILECs. If CLECs like Socket, with ISP affiliates, are able to use PIM-60 to their benefit, this new location portability “best practice” will force ILECs to absorb CLEC and ISP transport costs because, unlike the true FX service that is supposedly at issue in PIM-60, the CLEC service does not use a customer-paid private line between the original and new exchanges but rather seeks to force the ILEC to provide interexchange transport calls to the CLEC’s ISP customer in the distant rate center without compensation. This result clearly distorts current intercarrier compensation arrangements and upsets the settled expectations of decades of access charge rulings. The result also raises serious questions about the ability of any carrier to accurately comply with the request of law enforcement authorities under CALEA and other law enforcement endeavors and of emergency-service responders to accurately identify the location of a calling individual. PIM-60 also raises the very same concerns that were originally expressed by the FCC in the *First Report and Order* regarding customer confusion and the inability to determine whether toll charges will apply. All of these issues continue to stand as clear disadvantages of location portability, which should only be raised and resolved by the FCC in the context of a rulemaking proceeding, not behind closed doors in a lopsided industry-technical-standards committee meeting.

#### **Conclusion**

For all of the foregoing reasons, NANC should order the LNPA-WG to delete PIM-60, now designated issue 50, from the “best practices” list. NANC should consider the issue, if at all, as a policy initiative and follow the dictates of 47 C.F.R.

**Law Offices of Gregory J. Vogt, PLLC**

North American Numbering Council  
October 25, 2007

§52.26(b)(3) in referring the matter to the Chief of the Wireline Competition Bureau at the FCC. Because of this egregious abuse of LNPA-WG processes, we urge NANC to focus on these illegal, discriminatory, and grossly unfair procedures, and bring them into compliance with the original mandate of the organization.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory J. Vogt". The signature is written in a cursive style with a large, stylized initial "G".

Gregory J. Vogt  
Counsel for CenturyTel, Inc.

Enclosures

cc: Thomas Koutsky, Chair  
NANC Members  
Dana Shaffer  
Marilyn Jones

**EXHIBIT A**

**PIM 60**

## 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<sup>1</sup>. 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.

<sup>1</sup> 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<sup>2</sup>. 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:

<sup>2</sup> 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

_____
_____
_____

**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.

_____
_____
_____
_____

**LNPA WG:** (only)

Item Number: PIM 60

Issue Resolution Referred to: \_\_\_\_\_

Why Issue Referred: \_\_\_\_\_

_____
_____



**EXHIBIT B**

**MAY FINAL LNPA MINUTES**

**LNPA WORKING GROUP**  
**May 2007 Meeting**  
**Final Minutes**

<b>Banff, Canada</b>	<b>Host: Canadian Consortium</b>
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**TUESDAY 05/08/07**

Tuesday, 05/08/07, Attendance:

Name	Company	Name	Company
Tina Plaisance	Alltel (phone)	Marcel Champagne	NeuStar
Joe Cudo	Alltel (phone)	Paul LaGattuta	NeuStar
Mark Lancaster	at&t (phone)	Dave Garner	NeuStar
Ron Steen	at&t	Mike Panis	NeuStar
Adele Johnson	at&t Mobility	Linda Peterman	One Communications (phone)
Marian Hearn	Canadian Consortium	Mary Retka	Qwest (phone)
Nancy Sanders	Comcast	Matt Kohly	Socket (phone)
Chris Brown	Cox	Carol Frike	Sprint Nextel (phone)
Vicki Goth	Embarq	Rosemary Emmer	Sprint Nextel
Laura Drury	Evolving Systems	Susan Tiffany	Sprint Nextel
Therese Mooney	Global Crossing (phone)	Doug Babcock	Syniverse
Lynette Khirallah	NetNumber (phone)	Adam Newman	Telcordia
Jim Rooks	NeuStar	Paula Jordan	T-Mobile
Ed Barker	NeuStar (phone)	Mohamed Samater	T-Mobile
Charles Ryburn	NeuStar	Chipp Nelson	VeriSign
Syed Saifullah	NeuStar (phone)	Gary Sacra	Verizon (phone)
Dara Sedano	NeuStar Pooling (phone)	Earl Scott	Verizon (phone)
John Nakamura	NeuStar	Deb Tucker	Verizon Wireless
Stephen Addicks	NeuStar		

Attached are the Action Items assigned at the May, 2007 LNPA meeting. Also included are the remaining open Action Items from previous meetings.



MAY 2007 LNPA  
ACTION ITEMS.doc

**NOTE: ALL ACTION ITEMS REFERENCED IN THE MINUTES BELOW HAVE BEEN CAPTURED IN THE “MAY 2007 LNPA ACTION ITEMS” FILE ATTACHED ABOVE.**

**MEETING MINUTES:**

2007 LNPA WG Meeting/Call Schedule:

Following is the meeting schedule for the 2007 LNPA Meetings and calls.

<b>MONTH/ DATE (2007)</b>	<b>NANC</b>	<b>LNPA-WG</b>	<b>HOST</b>	<b>LOCATION</b>
January	TBD	9 <sup>th</sup> -11 <sup>th</sup>	Cingular	Jackson, Mississippi
February	TBD	No meeting. 2/12/07 call from 3pm to 5pm Eastern time, dial-in bridge number is 888-412-7808, pin 23272#		
March	TBD	13 <sup>th</sup> -15 <sup>th</sup>	Comcast	Denver, Colorado
April	TBD	No meeting. 4/10/07 call from 10am to 6pm Eastern time, dial-in bridge number is 888-412-7808, pin 23272#		
May	TBD	8 <sup>th</sup> -10 <sup>th</sup>	Canadian Consortium	Banff, Canada
June	TBD	No meeting. 6/12/07 call from 1pm to 5pm Eastern time, dial-in bridge number is 888-412-7808, pin 23272#		
July	TBD	10 <sup>th</sup> -12 <sup>th</sup>	NeuStar	Monterey, California
August	TBD	No meeting. 8/7/07 call if necessary		
September	TBD	11 <sup>th</sup> -13 <sup>th</sup>	Verizon Wireless	Franklin, Tennessee
October	TBD	No meeting. 10/9/07 call if necessary		
November	TBD	13 <sup>th</sup> -15 <sup>th</sup>	Sprint Nextel	Ft. Lauderdale, Florida
December	TBD	No meeting.		

		12/11/07 call if necessary		

- Continuing evaluation during 2007 will determine if interim conference calls are needed or if the decision to meet face-to-face every other month should be revisited.

03/07 Meeting Minutes Review:

- No changes were made to the Draft March 2007 LNPA WG minutes and they were accepted as Final.

04/07 Call Minutes Review:

- No changes were made to the Draft April 2007 LNPA WG minutes and they were accepted as Final.

OBF LSOP Committee Update

- No report was given at this meeting. Carol Frike, Sprint Nextel, has replaced Steve Moore and will provide LSOP readouts at future LNPA WG meetings.

OBF Wireless Committee and Intermodal Subcommittee Update (Deb Tucker, Verizon Wireless and OBF Wireless Committee Co-Chair):

- OBF 98 took place April 30 - May 4, 2007.

Discussion of Open Issues within the Wireless Committee:

- Issue 3062 - Remove Fax Support From WICIS - a separate Fax document was submitted and discussed. This issue is still open for additional work.
- Issue 3118 - WICIS Support of Wireline Jeopardy Responses - Still on schedule to be worked during OBF 99 in August.

New Issues introduced and worked:

- Issue 3144 - Removal of Delay R Codes 6H and 6J - Carriers are unable to respond to R Codes given for delay reasons. These two R Codes will be removed and the D Codes will continue to be used instead. This issue was accepted and remains open. Expected closure at OBF 99.
- Issue 3145 - Clean up inconsistencies related to Null values in the WICIS Data Dictionary. This issue was accepted and remains open. Expected closure at OBF 99.
- Issue 3146 - Modify OLSP and NLSP data dictionary elements for reseller name conditions. This issue was accepted and remains open. Expected closure at OBF 99.

Intermodal Subcommittee meeting:

- Issue 3065 - LSOP LSOG: Accelerated Port Process - The LSOP committee was not able to work this issue prior to the Intermodal Subcommittee meeting.
- Issue 3029 - WIR: Wireless Documentation for Mapping Between WICIS and LSOG - The Wireless Committee is trying to gather as much information as possible regarding LSOG implementations so that they can determine if any assumptions can be made for intermodal porting. Work is still being done to complete the LSOG to WICIS element mapping. Initial analysis indicates potential for WICIS and LSOG modifications that would improve the porting process. Separate issues will be submitted through the LSOP and Wireless committees for any suggested changes that develop.
- Issue 2943 - WIR: Minimal Data Exchange Number Portability Service Request - After much discussion, the committee agreed to close Issue 2943 with the following Resolution Statement:

When the LNPA referred PIMs 42 and 44 to the OBF, the intention was to address implementation issues. In order to resolve the issue, the wireless and wireline companies were to develop a consistent minimum data set that would be unilaterally implemented. Although the LSOG is a nationally agreed upon guideline, after many discussions, it was determined that no agreement could be reached to resolve this issue due to the following factors:

1. The implementation of LSOG is not standardized across wireline providers due to the fact that wireline providers implement LSOG based on their specific business models/requirements.
2. Changes to LSOG documentation will not require the individual wireline providers to implement a standard data exchange process for porting.

It is important to note that this issue was placed into Initial Closure during the meeting and will go to Final Closure 21 days after notes posting if there are no objections.

- No new Intermodal issues were introduced.
- Next meeting: OBF 99 will take place August 13 - 17, 2007 in San Antonio, TX.

Industry Numbering Committee (INC) Update (Adam Newman, Telcordia & INC Vice Chair):

- INC Issue 497: NANC requested that INC investigate direct assignment of numbers to VoIP providers. INC went back and looked at the action item from NANC and it

asked that INC also look at impacts and related work in ATIS and other industry standards groups. INC may issue a liaison to other industry groups. No new update to this issue at this time.

- INC Issue 506 (Unusable 1K Blocks) addresses the LNPA WG's request to make revisions to the TBPAG Appendix 2 block donation form in order to prompt providers to perform any necessary intra-SP ports on their contaminated TNs prior to block donation.

PA Change Order 51 has been approved and will be available to PAS users effective May 21<sup>st</sup>. Issue 506 will go to final closure on that date.

- INC Issue 510 – Video Relay Service (VRS) Alternatives – This continues to be worked in INC. The Contribution Team is looking at 3 alternatives – ENUM, Direct DNS, and NPAC. The report continues to progress. INC VoIP Committee and FoN leadership met with Consumer Governmental Affairs Bureau and the importance of this issue was expressed.
- INC Issue 527 addresses blocks with effective dates earlier than the effective date of the NPA-NXX of the associated LRN. A footnote was placed on the Part 1A form for SPs to make sure the NPA-NXX of an LRN associated with a 1K block is effective in the network. The issue is in Final Closure.
- INC Issue 528 – Testing guidelines for NPA-NXX-X blocks – INC continues to work this issue. One stumbling block is that NIIF guidelines call for testing prior to the effective date and the 1K block is not activated until the effective date. One possible approach is to reflect in the guidelines that for pooled blocks, those providers wishing to test should do so immediately after the effective/activate date, but before assignment to end users.
- INC Issue 532: Kinsale Mobile asked for dedicated assignment of an easily recognizable NPA for charity services. A portion of the call bill would be donated to charity. INC has asked a number of questions, e.g., are numbers portable, as well as billing-related questions. Kinsale did not attend the last INC meeting or respond. INC has sent another inquiry with a request to provide responses by the June INC meeting.
- INC Issue 535: Block contamination information for block returns. Permission was sought and granted from the NAPM LLC for the PA to get reports from the NPAC. INC will proceed with making appropriate changes for this issue.
- INC Issue 539 addresses clarification of section 8.3.6.
- INC Issue 541 addresses how to protect against the porting of numbers from 1K blocks donated to the pool.

NANC Future of Numbering (FoN) Working Group Update (Sue Tiffany, Sprint Nextel):

- Sue Tiffany, Sprint Nextel, provided an update of the NANC FoN Working Group.
- The FoN developed a contribution form (AID Form) and process based on the LNPA WG's PIM process. This was approved by NANC. The FoN group is now working on several contributions and is working on their report based on these contributions. Issues include:
  - International use of NANP resources
  - Impact of Onstar-like services
  - New and future services.

Wireless Testing Subcommittee (Mohamed Samater, T-Mobile and WTSC Co-Chair):

- Mohamed Samater, T-Mobile and WTSC Co-Chair, reported that vendor-to-vendor testing will be done first for WICIS 3.1.0. WICIS 4.0 is planned for next year.

Architecture Planning Team (APT) Readout (Jim Rooks, NeuStar):

- Jim Rooks, NeuStar, reported on the March 2007 APT meeting.
- The group discussed the positive results of the 10,000 TN modify test results and agreed to hold off for six months before doing the next trial at 15,000 TN operations (the current interface requirements).
- Discussion also took place on the 25,000 TN/hour Change Order NANC 397 submitted by Verizon Wireless.
- The team discussed how we could acquire capacity planning information for the future. Options include:
  1. Do an extensive exercise similar to what was done for NANC 393, using NFG data and measurements,
  2. Move directly to the 25,000 level request to develop requirements.
- Notification priorities were discussed. Recovery activity generates large volumes of notifications, thus impacting other carriers. A proposal was made to separate notifications generated in recovery to apply lower priority. This is now NANC 419.
- NANC 372 for non-CMIP interface (SOAP/XML) is still being discussed.
- An offline batch process for modifies similar to the SPID migration process was discussed. A major problem identified is keeping all providers in sync.

PIM Discussion:

- PIM 32 - This PIM, submitted by Syniverse (formerly TSI), seeks to address issues related to the process for obtaining a Customer Service Record (CSR), which contains information necessary to complete a Local Service Request (LSR) for porting in a reseller number.



PIM 32v4.doc

Regarding the attached PIM 32 report submitted to NANC, Gary Sacra, LNPA WG Co-Chair, will send the applicable text to Mohamed Samater, T-Mobile, for inclusion in the LNPA WG's NP Best Practices document. The added text will be reviewed by the LNPA WG on the June 12<sup>th</sup> conference call.



PIM 32v4.doc

Upon receipt of the applicable text from the PIM 32 report to NANC from Gary Sacra, LNPA WG Co-Chair, Mohamed Samater, T-Mobile, will incorporate the text as Item # 48 in the LNPA WG's NP Best Practices document.

PIM 32 will stay open until review of the NP Best Practices item.

- PIM 42 – This PIM, submitted by Syniverse, seeks to review the wireline requirement for certain fields on the LSR.



PIM42 v2.doc

PIM 42 is being worked through wireline companies' Account Management process. It is also tracking awaiting the outcome of Issues 2943 and 3029 in the OBF.

At the May 2007 LNPA WG meeting, it was reported that INC Issue 2943 is in Initial Closure without coming to agreement on resolution. A formal response to the LNPA WG is coming from OBF. We will await that response before deciding how to proceed.

- PIM 44 – This PIM, submitted by T-Mobile, Sprint, Verizon Wireless, Nextel, Cingular, and US Cellular, seeks to address varying rules among wireline carriers for developing a Local Service Request (LSR) in order to port a number.



"PIM 44.doc"

PIM 44 is tracking awaiting the outcome of Issues 2943 and 3029 in the OBF. See attached liaison letter from the OBF on Issue 2943.





050727001s.pdf

At the May 2007 LNPA WG meeting, it was reported that INC Issue 2943 is in Initial Closure without coming to agreement on resolution. A formal response to the LNPA WG is coming from OBF. We will await that response before deciding how to proceed.

- PIM 50 – This PIM, submitted by Syniverse, seeks to address instances where wireline to wireless ports fail the automated process because they are from large accounts where the Customer Service Record (CSR) is too large to return on a CSR query.



PIM 50.doc

**Wireless Service Providers** are working change control efforts for PIM 50 through their appropriate wireline Account Management teams.

At the November 2006 NANC meeting, NANC recommended that carriers should be following the OBF guidelines. The OBF LSOG guidelines have options for providing a CSR for a TN with or without directory, or the entire account with or without directory.

At the March meeting, the LNPA WG reached consensus to add to the Number Portability Best Practices document text stating that if wireline carriers sent only the information requested in the customer inquiry per the LSOG CSI guidelines, this error would be greatly reduced if not eliminated.

Review of the text for the NP Best Practices document will be reviewed on the June 2007 LNPA WG conference call.

- PIM 51 – This PIM, submitted by Nextel, seeks the prevention of NXX codes being opened to portability in NPAC by the incorrect provider.



PIM 51.doc

**NeuStar** developed Change Order 414 proposing an automated process to prevent the wrong service provider from opening up a code in NPAC. PIM 51 is now tracking NANC 414 for the automated solution.

Regarding the attached manual process for the attached PIM 51 cleanup in NPAC, **Gary Sacra**, LNPA WG Co-Chair, will notify the NAPM LLC in the May Project Executive report that the LNPA WG reached consensus at their May 2007 meeting to recommend to the LLC that they request a Statement of Work (SOW) for the manual

process from NeuStar. Gary, as LNPA WG Co-Chair, will send a formal request to the LLC.



PIM 51  
Subcommittee Recom

- PIM 52 – This PIM, submitted by Sprint Nextel, seeks to address issues related to carriers receiving 1K blocks from the pool in which the Intra-Service Provider ports have not been completed by the donor provider prior to block donation to the pool.



PIM 52 v3.doc

The LNPA WG drafted the attached liaison to the INC requesting revisions to the TBPAAG Appendix 2 block donation form suggesting questions to prompt the donating service provider to perform any necessary Intra-Service Provider ports, if applicable, and protect numbers in the block to be donated from further assignment by the donating provider. The INC accepted this issue (INC Issue 506).



Unusable Block  
Letter to INC v3.doc

As part of INC Issue 506, the INC made changes to the Thousands Block PA Guidelines and form. PA Change Order 51 has been approved and will be available to PAS users effective May 21<sup>st</sup>. Issue 506 will go to final closure on that date.

- PIM 54 – This PIM, submitted by Comcast, seeks to reduce the interval for certain wireline-wireline and inter-modal ports to one day.



PIM 54v2.doc

Action Item 0906-12: **Nancy Sanders**, Comcast, will determine if Comcast will revise the attached PIM 54 to reflect the scope of the work undertaken by the LNPA WG's Pre-Port Subcommittee.

Action Item 0906-12 remains open.

The pre-port interval is being addressed in the Pre-port Subcommittee. The subcommittee will propose minor changes to the flows and narrative.

- PIM 55 – This PIM, submitted by the NeuStar Clearinghouse Vendor, seeks to address issues related to wireline Provider Initiated Activity.



PIM 55 v2.doc

Mubeen Saifullah, NeuStar Clearinghouse, introduced an issue in the OBF’s Wireless Committee to support jeopardies for possible implementation in WICIS Release 4.1. This issue is now in a tracking state awaiting inclusion in WICIS Release 4.1, which will likely be deployed sometime in 2009.

- PIM 56 – This PIM, submitted by Sprint Nextel, seeks to address instances where LNP database updates are not always propagated by all providers down to their network element routing databases in a timely manner.



PIM 56 v2.doc

Regarding the attached draft process addressing PIM 56, Sue Tiffany, Sprint Nextel, will revise the document to add a step between Steps 2 and 3 stating that the NNSP checks to make sure that NPAC data is correct. The PIM 56 issue and the resolution steps will be placed in the NP Best Practices document when finalized. This will be reviewed and finalized on the June 12<sup>th</sup> conference call.



PIM 56 Process (2).doc

The LNPA WG is awaiting permission from NIIF to put their document link in our Best Practices.

- PIM 57 – This PIM, submitted by Cingular and Sprint Nextel, seeks to address porting issues that occur when a Reseller discontinues business and/or declares bankruptcy.



PIM 57 v3.doc

Cingular has developed a port authorization form that they are going back to get their resellers to sign so that if they go out of business, they can legally port the customers. The attached form was presented by Cingular at the March 2007 LNPA WG meeting.



Authorization Form v1.doc

Sprint Nextel has created a checklist to encourage their resellers not to abandon their customers and provide them with options. This checklist was presented by Sue Tiffany, Sprint Nextel, at the March 2007 LNPA WG meeting.



Revised Bankruptcy Checklist.doc

**Service Providers** are to review the attached contributions from Cingular (Authorization Form v1.doc) and Sprint Nextel (Revised Bankruptcy Checklist.doc) for discussion at the May 2007 LNPA WG meeting. Action Item 0307-17 remains open.

- PIM 58 – This PIM, submitted by BellSouth and Verizon, seeks to address instances where the LERG assignee of an NXX code has not opened a code to portability in NPAC, and either cannot be contacted to do so, or refuses to do so.



PIM 58 v3.doc

Text for the NP Best Practices document will be reviewed on the June 12<sup>th</sup> LNPA WG conference call.

- PIM 59 – This PIM, submitted by the NeuStar Clearinghouse Vendor, seeks to address issues related to the unlocking of the 911 database when numbers are ported to VoIP providers.



PIM 59.doc

Text for the NP Best Practices document will be reviewed on the June 12<sup>th</sup> LNPA WG conference call.

- PIM 60 – This PIM, submitted by Socket Telecom, requests that the LNPA WG provide an opinion on whether or not a customer, who is physically relocating to a different Rate Center, should be allowed to port their number.



PIM 60.doc

At the May 2007 LNPA WG meeting, the group reviewed the criteria necessary for this to be considered a legitimate porting scenario. Matt Kohly, Socket, agreed that these bullets were accurate. **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.

At the May 2007 LNPA WG meeting, consensus was reached that this is a legitimate port request if each of these caveats outlined above are satisfied.

**Gary Sacra**, LNPA WG Co-Chair, will respond via e-mail to Century Tel's request to modify the April 2007 meeting minutes to document their objections.

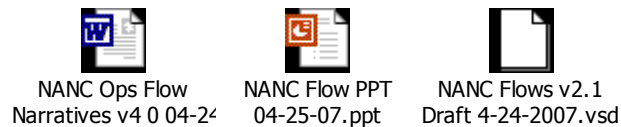
**NOTE: This Action Item was completed on 5/14/07. The response to Century Tel indicated that their comments will be documented in the May 2007 LNPA WG minutes since they were discussed during the May 2007 meeting.**

Louisiana 504 & 985 RC Consolidation and Realignment (All):

- NPA 985 numbers that are moving to NPA 504 will have an NPA change, but NXX 238 has already been assigned in NPA 504, so they will have to have a 10-digit number change. Cingular has 985-238. They have applied for 504-644 to replace 985-238.
- Carriers should delete their 985-238 numbers in the NPAC upon mandatory dialing.
- It was stated that notices will have to go out to customers for those having to take a number change.

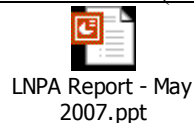
- From an LNPA WG perspective, if the 985-238 customers have permissive dialing for both old and new number, any 985-238 numbers that are already ported or that port during permissive dialing period will have both numbers ported and the 985-238 ported numbers will have to be deleted at the end of permissive.
- It was stated that there are 68 ported numbers in 985-238. Four carriers have these numbers.
- Steve Addicks, NeuStar, will contact Wayne Milby, NANPA, to send out a notice for the next meeting of the subcommittee that is discussing this LA activity.

Pre-Port Subcommittee (Sue Tiffany – Sprint Nextel/Nancy Sanders – Comcast):



- Sue Tiffany, Sprint Nextel, and Nancy Sanders, Comcast, walked the group through the revisions to the NANC LNP flows proposed by the Pre-Port Subcommittee. There were no objections to removing Loss Alert from the flows.
- The Pre-Port Subcommittee will continue to work on proposed changes to Figures 3 and 5.

Capacity Management Discussion (NeuStar):



- NeuStar presented the attached report on occurrences of flow control.
- The 1<sup>st</sup> table reflects how many times in the month the provider went into flow control.
- The 2<sup>nd</sup> table reflects the number of seconds in the month the provider was in flow control.
- NeuStar stated that these numbers do not indicate a serious problem and recommended continued monitoring. NeuStar also recommended an eventual 15K stress test sometime in the mid-September to end of October 2007 timeframe.

**WEDNESDAY 05/09/07**

Wednesday, 05/09/07, Attendance:

Name	Company	Name	Company
Tina Plaisance	Alltel (phone)	Marcel Champagne	NeuStar
Joe Cudo	Alltel (phone)	Paul LaGattuta	NeuStar
Mark Lancaster	at&t (phone)	Dave Garner	NeuStar
Ron Steen	at&t	Mike Panis	NeuStar
Adele Johnson	at&t Mobility	Mary Retka	Qwest (phone)
Marian Hearn	Canadian Consortium	Susan Tiffany	Sprint Nextel
Nancy Sanders	Comcast	Doug Babcock	Syniverse
Chris Brown	Cox	Colleen Collard	Tekelec (phone)
Vicki Goth	Embarq	Adam Newman	Telcordia
Laura Drury	Evolving Systems	Paula Jordan	T-Mobile
Therese Mooney	Global Crossing (phone)	Mohamed Samater	T-Mobile
Lynette Khirallah	NetNumber (phone)	Chipp Nelson	VeriSign
Jim Rooks	NeuStar	Gary Sacra	Verizon (phone)
Ed Barker	NeuStar (phone)	Earl Scott	Verizon (phone)
Charles Ryburn	NeuStar	Deb Tucker	Verizon Wireless
Syed Saifullah	NeuStar (phone)		
Dara Sedano	NeuStar Pooling (phone)		
John Nakamura	NeuStar		
Stephen Addicks	NeuStar		

**MEETING MINUTES:**

April NANC Readout (Gary Sacra, LNPA WG Co-Chair):

- Gary Sacra, LNPA WG Co-Chair, reported that the NANC, at their April 17<sup>th</sup> meeting, accepted the attached revised LNPA WG Issues Status Matrix and gave very positive feedback. It was also reported to NANC that the LNPA WG had reached consensus on placing resolution text on PIM 32 and the 24 Hour FOC Position Paper, as outlined in the attached documents, in the NP Best Practices document. NANC Chair Tom Koutsky asked that he be informed when these issues were placed in the NP Best Practices document.



04-07 NANC LNPA  
WG Report.rtf



LNPA WG Issues  
Status Matrix v6.doc



PIM 32v4.doc



LNPA WG Position on  
24 Hour FOC v3.doc

Change Management Discussion (NeuStar):



NANC Change  
Orders 05-01-07 - chi

- The group briefly touched on NANC 372. At the March 2007 LNPA WG meeting, more discussion took place regarding an additional NPAC interface using XML/SOAP. For the May 2007 meeting, Service Providers and vendors are to bring any additional data or information to share with the group. This Change Order will be discussed in further detail in the APT meeting tomorrow.
- NANC 414
  - Update of the code assignee table to be weekly.
  - Any discrepancies must be resolved by the appropriate SP. In most cases, this will require the code holder to correct the NANPA's code assignee record before the NPAC can change the code assignee value that is used by the NPAC for the code validation process defined in this change order.
  - There were no objections to displaying the OCN to SPID relationship on the secure website.
  - Edits to include:
    - 4 characters
    - valid NPAC SPID
    - OCN is not assigned to another carrier
      - SPs responsibility to resolve with other carrier
      - Error message would include both OCN and SPID
  - This OCN to SPID mapping would be part of the SP profile. Question do we want this to be modifiable over the CMIP interface? Action for SPs and local system vendors to determine. As an alternative, it could be modified via the LTI or NPAC Help Desk.
  - Action for SPs to develop their OCN to SPID relationship on a region basis for discussion at the July 2007 meeting.
  - Action Item 0307-16: Regarding the attached PIM 51, Service Providers are to determine if a manual cleanup of codes opened in the NPAC by the incorrect provider and ongoing maintenance of the OCN – SPID relationship is cost justified. This will be discussed at the May 2007 LNPA WG meeting.



PIM 51.doc

- No – T-Mobile and at&t.
- Yes – VZW and Sprint proposed doing a manual clean up every 6 months.
- The group then reviewed the attached manual process develop previously by the PIM 51 Subcommittee.





PIM 51

Subcommittee Recom

- at&t objected to going to the LLC and asking for a SOW for a manual process. Gary Sacra, LNPA WG Co-Chair, will notify the NAPM LLC in the May Project Executive report that the LNPA WG reached consensus at their May 2007 meeting to recommend to the LLC that they request a Statement of Work (SOW) for the manual process from NeuStar. Gary, as LNPA WG Co-Chair will send a formal request to the LLC.
- NANC 417 and 418
  - Syniverse stated that they are ok with how these Change Orders are documented.
- NANC 419 would allow an SP to determine the priority of notifications received as a result of another provider in recovery.
- NANC 420 is a doc only change.
- NANC 421 updates the ASN.1 for SV Type 4 for pre-paid wireless. A local system vendor stated that local systems may not display “pre-paid wireless” but only SV Type 4 because the ASN.1 has not been updated yet.
- NANC 413 Event ID Rollover Issue
  - Action Item 0307-15: Related to Action Item 0307-03, all Local System Vendors are to verify whether they need to make system changes as a result of the Event ID Rollover issue upon performing the testing addressed in Action Item 0307-03. This will be discussed on the April 10<sup>th</sup> LNPA WG conference call.
    - Telcordia has no issues. Tekelec, Evolving Systems, and VeriSign require a change as defined in NANC 413.
    - NeuStar stated that Object IDs other than Action IDs are probably years away from rollover. They are manually addressing Action IDs to ensure transparency for SP systems at this time.
    - If a local system treats the ID as a signed integer, it must support negative numbers.
    - Action Item 0307-15 is closed.
    - Question to local system vendors – when will they roll necessary changes into production?
      - Evolving said that all but two of their customers will get the patch this week. The 2 remaining customers will get the patch the week of June 7<sup>th</sup>.

- Tekelec is rolling into the next release this summer (August). They will schedule interop testing with NeuStar with the changes in their next release.
- Regarding any local system changes required to address the Event ID rollover issue as defined in NANC 413, **Local System Vendors and Service Providers** are to provide a monthly status on the implementation of this change until complete.
- At a future TBD date, **NeuStar** will contact those providers from which the LNPA WG has received no status reports to determine whether they also have made the necessary local system update to resolve the Event ID rollover issue as defined in NANC 413.
- NeuStar will look into possibly putting a boundary check in new release testing.

- NANC 299



NANC 299 Issue  
05-08-2007.doc

- In early morning hours, some provider associations are being aborted due to invalid sequence numbers. Release 3.3 implemented a heartbeat message that contains a sequence number that NPAC treats independently from the other sequence number. Some provider systems consider them to be the same sequence number. NPAC will add in the SP profile whether the provider considers them to be the same and react accordingly. Planned for an NPAC point release in June.
- **Service Providers** are to check to see if they support the Application Level Heartbeat message and ensure that their profile in NPAC is consistent.

SPID Migration Discussion (NeuStar):

- In response to a question previously asked, NeuStar stated that the deadline for making changes to a SPID migration is 5pm Saturday the day before the day of the migration. Cancellations of all migrations in a region can be done almost up until the time of the migration because it just means no SMURF files will be created. Later than that for changes can be accommodated but could delay creation and distribution of the SMURF files. **NeuStar** is to determine how much of a delay in creating and delivering SPID migration SMURF files will result if they have a late cancellation of a provider's migration out of a set of SMURF files. The scenario to be analyzed is 5 providers are doing migrations and one of them is cancelled at 11:45pm the Saturday night before the migration.

2007 Meeting/Call Schedule (All):

- Attached is the current 2007 LNPA WG schedule.



2007 LNPA WG  
Meeting and Call Sche

#### Discussion of Need for June Conference Call (All):

- It was agreed to hold a call on June 12<sup>th</sup> from 1pm to 5pm eastern. The bridge number is **888-412-7808 PIN 23272#**
- The agenda will consist of:
  - Best Practices review:
    - PIMs 32, 50, 56, 58, 59
    - 24 hour FOC issue
  - Status of Event ID rollover issue
  - PIM 60
  - OBF response on Issue 2943 if we receive it

#### Development of NANC Report (Gary Sacra / Paula Jordan – LNPA WG Co-Chairs):

- The next NANC meeting has not been scheduled at this time.

#### Review of March 2007 LNPA WG Action Items:



MARCH 2007 LNPA  
ACTION ITEMS.doc

#### **March 2007 LNPA WG Action Items:**

- Item 0307-01: This item has been completed and is Closed.
- Item 0307-02: This item has been completed and is Closed.
- Item 0307-03: This item has been completed and is Closed.
- Item 0307-04: This item has been completed and is Closed.
- Item 0307-05: This item has been completed and is Closed.
- Item 0307-06: This item has been completed and is Closed.
- Item 0307-07: This item has been completed and is Closed.
- Item 0307-08: This item remains Open.

- Item 0307-09: This item remains Open.
- Item 0307-10: This item remains Open.
- Item 0307-11: This item remains Open.
- Item 0307-12: This item has been completed and is Closed.
- Item 0307-13: This item has been completed and is Closed.
- Item 0307-14: This item has been completed and is Closed.
- Item 0307-15: This item has been completed and is Closed.
- Item 0307-16: This item has been completed and is Closed.
- Item 0307-17: This item remains Open.
- Item 0307-18: This item has been completed and is Closed.
- Item 0307-19: This item has been completed and is Closed.
- Item 0307-20: This item has been completed and is Closed.

**March 2007 APT Action Items:**

- Item 0307-21: This item has been completed and is Closed.
- Item 0307-22: This item has been completed and is Closed.
- Item 0307-23: This item has been completed and is Closed.
- Item 0307-24: This item remains Open.

**LNPA WG Action Items Remaining Open from Previous Meetings:**

- Item 0605-22: This item remains Open.
- Item 0706-06: This item remains Open.
- Item 0706-11: This item has been completed and is Closed.
- Item 0906-12: This item remains Open.

- Item 0906-14: This item remains Open.

**APT Action Items Remaining Open from Previous Meetings:**

- None remain open at this time.

Review of April 2007 Action Items:

- No Action Items were assigned on the April 2007 LNPA WG conference call.

Unfinished/New Business:

- No unfinished or new business was raised.

**THURSDAY 05/10/07**

**ARCHITECTURE PLANNING TEAM (APT) MEETING**

Thursday, 05/10/07, Attendance:

Name	Company	Name	Company
Tina Plaisance	Alltel (phone)	Marcel Champagne	NeuStar
Mark Lancaster	at&t (phone)	Dave Garner	NeuStar
Ron Steen	at&t	Mike Panis	NeuStar
Marian Hearn	Canadian Consortium	Mary Retka	Qwest (phone)
Chris Brown	Cox	Susan Tiffany	Sprint Nextel
Vicki Goth	Embarq	Colleen Collard	Tekelec (phone)
Laura Drury	Evolving Systems	Jason Kempson	Telcordia (phone)
Jim Rooks	NeuStar	Adam Newman	Telcordia
Charles Ryburn	NeuStar	Paula Jordan	T-Mobile
John Nakamura	NeuStar	Mohamed Samater	T-Mobile
Stephen Addicks	NeuStar	Jason Lee	Verizon (phone)
		Gary Sacra	Verizon (phone)
		Earl Scott	Verizon (phone)
		Deb Tucker	Verizon Wireless

**APT MEETING MINUTES:**

APT Mission Statement: To assess Number Portability industry production technical issues within the purview of the LNPA Working Group and develop recommendations for the strategic direction of the Number Portability architecture.

The current edition of the APT will focus on end-to-end LNP performance, including production needs, large ports, and testing and certification.

NANC 349 Review (Action Item 0307-24) (All):

Action Item 0307-24: **APT Participants** are to review NANC Change Order 349, which proposes investigating a batch processing alternative to generating all messages associated with large porting activity and sending them across the interface, and come prepared to discuss at the May 2007 APT meeting.

- It was agreed that all activity affecting call routing and TCAP message routing needs to be synchronized and performed in real time and not a candidate for batch processing.
- Action Item 0307-24 stays open. This discussion topic will be on the July 2007 APT agenda.

NANC 372 Review (Next Steps) (Action Item 0307-23) (All):

Action Item 0307-23: **APT Participants** are to review NANC Change Order 372, which proposes investigating additional alternatives to the CMIP protocol, and come prepared to discuss at the May 2007 APT meeting.

- It was stated that the XML message size is larger than CMIP message size, but compression is possible.
- One concern is how we would handle large messages such as audits which could exceed 1 meg in CMIP.
- Action Item 0307-23 is closed.
- It was agreed that we need to develop a business case-like analysis in order to possibly move this forward.
- **LNPA Working Group Participants** are to review NANC 372 and the discussions that took place regarding its benefits/pros and cons for discussion at July 2007 APT meeting.
- **Sue Tiffany**, Sprint Nextel, and **Deb Tucker**, Verizon Wireless, are to investigate if ATIS developed a business case to justify the migration from CORBA to SOAP/XML.

Discussion of Notification Prioritization (Action Item 0307-22) (All):

Action Item 0307-22: Regarding the discussion of notification prioritization to address the issue of large volumes of notifications generated as a result of providers entering recovery, NeuStar will work with Cingular to develop a NANC Change Order for presentation to the LNPA WG's APT.

- NANC 419 will be on the June 2007 call agenda.
- The APT will recommend to the LNPA WG on the June call that we accept NANC 419.
- Action Item 0307-22 is closed.

NANC 397 Review (Next Steps) (Action Item 0307-21) (All):

Action Item 0307-21: Regarding NANC Change Order 397, NeuStar will identify LSMS and SOA throughput requirements to support 25K TNs per hour. The assumption will be that these would be singles, i.e., one message is equal to one TN.



NANC Change  
Orders 05-01-07 - ch

- The group reviewed the revised NANC 397 requirements to support 25K/hour in the Change Management document attached above.
- NeuStar stated that providers were not using more than 25% of their T1 bandwidth during the 10K exercise. T1 capacity should not be an issue for 25K in an hour.
- It was stated that if we did not have a requirement to back out during the night we could meet the 25K in an 8 hour period today. It was suggested that we should explore a faster way of backing out – perhaps a new message over the interface that could reverse what was done. NeuStar will provide a writeup for the July 2007 APT agenda.
- Action Item 0307-21 is closed.

Action Item Review/Topics/Agenda for Discussion at Next Meeting:

Next APT agenda for July 2007 meeting:

- NANC 349
- NANC 372
- NANC 397
- NANC 419 - Notification prioritization Change Order
- NANC 408 – action for all to review for July APT meeting.

*Next LNPA WG Conference Call ... June 12, 2007, 1pm – 5pm Eastern,  
888-412-7808, PIN 23272#*

*Next LNPA WG Meeting ... July 10-12, 2007, Monterey, California – Hosted by  
NeuStar*



## **EXHIBIT C**

**JUNE FINAL LNPA MINUTES v2 (2)**

**LNPA WORKING GROUP**  
**June 2007 Conference Call**  
**Final Minutes**

**TUESDAY 06/12/07**

Tuesday, 06/12/07, Conference Call Attendance:

<b>Name</b>	<b>Company</b>	<b>Name</b>	<b>Company</b>
Scotty McDonald	Alltel	Charles Ryburn	NeuStar
Joe Cudo	Alltel	John Nakamura	NeuStar
Tina Plaisance	Alltel	Paul LaGattuta	NeuStar
Ron Steen	at&t	Mary Retka	Qwest
Jennie Harrison	Centcom	Matt Kohly	Socket Telecom
Michael Penn	Century Tel	Susan Tiffany	Sprint Nextel
Lonnie Keck	Cingular	Michael Klappa	Sprint Nextel
Adele Johnson	Cingular	Carol Frike	Sprint Nextel
Nancy Sanders	Comcast	Adam Newman	Telcordia
Chris Brown	Cox	Paula Jordan	T-Mobile
Vicki Goth	Embarq	Chipp Nelson	VeriSign
Therese Mooney	Global Crossing	Kevin Mcgovern	Verizon
Mubeen Saifullah	NeuStar Clearinghouse	Gary Sacra	Verizon
Shannon Sevigny	NeuStar Pooling	Earl Scott	Verizon
Dave Garner	NeuStar	Jason Lee	Verizon (phone)
Stephen Addicks	NeuStar	Deb Tucker	Verizon Wireless
Ed Barker	NeuStar	Tom Zablocki	Vonage

No Action Items were assigned on the June 2007 LNPA WG conference call.

**CONFERENCE CALL MINUTES:**

2007 LNPA WG Meeting/Call Schedule:

Following is the meeting schedule for the 2007 LNPA Meetings and calls.

<b>MONTH/ DATE (2007)</b>	<b>NANC</b>	<b>LNPA-WG</b>	<b>HOST</b>	<b>LOCATION</b>
January	TBD	9 <sup>th</sup> -11 <sup>th</sup>	Cingular	Jackson,

				Mississippi
February	2/13/07	No meeting. 2/12/07 call from 3pm to 5pm Eastern time, dial-in bridge number is 888-412-7808, pin 23272#		
March	TBD	13 <sup>th</sup> -15 <sup>th</sup>	Comcast	Denver, Colorado
April	TBD	No meeting. 4/10/07 call from 10am to 6pm Eastern time, dial-in bridge number is 888-412-7808, pin 23272#		
May	TBD	8 <sup>th</sup> -10 <sup>th</sup>	Canadian Consortium	Banff, Canada
June	TBD	No meeting. 6/12/07 call from 1pm to 5pm Eastern time, dial-in bridge number is 888-412-7808, pin 23272#		
July	TBD	10 <sup>th</sup> -12 <sup>th</sup>	NeuStar	Monterey, California
August	TBD	No meeting. 8/7/07 call if necessary		
September	TBD	11 <sup>th</sup> -13 <sup>th</sup>	Verizon Wireless	Franklin, Tennessee
October	TBD	No meeting. 10/9/07 call if necessary		
November	TBD	13 <sup>th</sup> -15 <sup>th</sup>	Sprint Nextel	Ft. Lauderdale, Florida
December	TBD	No meeting. 12/11/07 call if necessary		

- Continuing evaluation during 2007 will determine if interim conference calls are needed or if the decision to meet face-to-face every other month should be revisited.

NP Best Practices Review (All):



LNPA\_NP\_Best\_Practices\_06-12-2007 v2.c

- PIM 32 (Action Items 0507-04 and 0507-08)

Action Item 0507-04: Regarding the attached PIM 32 report submitted to NANC, Gary Sacra, LNPA WG Co-Chair, will send the applicable text to Mohamed Samater for inclusion in the LNPA WG's NP Best Practices document. The added text will be reviewed by the LNPA WG on the June 12<sup>th</sup> conference call. See related Action Item 0507-08.



PIM 32v4.doc

Action Item 0507-08: Upon receipt of the applicable text from the PIM 32 report to NANC from Gary Sacra, LNPA WG Co-Chair, Mohamed Samater, T-Mobile, will incorporate the text as Item # 48 in the LNPA WG's NP Best Practices document. See related Action Item 0507-04.

- The group reviewed and accepted the text for PIM 32 (Item 48 in the NP Best Practices document attached above) with the following exception:

The following will be added to Item 48 Decisions/Recommendations:

At the April 17, 2007 NANC meeting, the LNPA WG submitted this final Position Paper in order to bring the LNPA WG's consensus position to the attention of the NANC and the FCC.

- Action Items 0507-04 and 0507-08 are closed.
- PIM 50 (Action Item 0307-09)

Action Item 0307-09: Upon receipt of the applicable text from PIM 50 from Gary Sacra, LNPA WG Co-Chair, Mohamed Samater, T-Mobile, will incorporate the text as Item # 46 in the LNPA WG's NP Best Practices document.

- The group reviewed and accepted the text for PIM 50 (Item 46 in the NP Best Practices document attached above).
- Action Item 0307-09 is closed.

- PIM 58 (Action Item 0307-08)

Action Item 0307-08: Upon receipt of the applicable text from PIM 58 v3 from Gary Sacra, LNPA WG Co-Chair, Mohamed Samater, T-Mobile, will incorporate the text as Item # 45 in the LNPA WG's NP Best Practices document.

- The group reviewed and accepted the text for PIM 58 (Item 45 in the NP Best Practices document attached above).
- Action Item 0307-08 is closed.

- 24 Hour FOC Issue (Action Items 0307-06 and 0307-10)

Action Item 0307-06: Regarding the attached LNPA WG Position Paper addressing the requirement to return an FOC in response to a valid LSR within 24 hours, Gary Sacra, LNPA WG Co-Chair, will send the applicable text to Mohamed Samater for inclusion in the LNPA WG's NP Best Practices document. See related Action Items 0307-10.



LNPA WG Position on  
24 Hour FOC v3.doc

Action Item 0307-10: Upon receipt of the applicable text from Gary Sacra, LNPA WG Co-Chair, regarding the attached LNPA WG Position Paper addressing the requirement to return an FOC in response to a valid LSR within 24 hours, Mohamed Samater, T-Mobile, will incorporate the text as Item # 47 in the LNPA WG's NP Best Practices document. See related Action Item 0307-06.

- The group reviewed and accepted the text for the 24 Hour FOC Issue (Item 47 in the NP Best Practices document attached above).
- Action Items 0307-06 and 0307-10 are closed.

- PIM 59



PIM 59.doc

- The group reviewed and accepted the text for PIM 59 (Item 49 in the NP Best Practices document attached above).

PIM 56 Review (Action Item 0307-11, 0507-09) (Sue Tiffany, Sprint/Nextel):

Action Item 0307-11: Related to Action Item 0307-13, Sue Tiffany, Sprint Nextel, will review and compare the attached NIIF document with the attached draft Sprint Nextel contribution for PIM 56 for possible revision of the contribution.



NIIF  
atis0300082.pdf

Action Item 0507-09: Regarding the attached draft process addressing PIM 56, Sue Tiffany, Sprint Nextel, will revise the document to add a step between Steps 2 and 3 stating that the NNSP checks to make sure that NPAC data is correct. The PIM 56 issue and the resolution steps will be placed in the NP Best Practices document when finalized. This will be reviewed and finalized on the June 12<sup>th</sup> conference call.



PIM 56 Process  
(2).doc

- Sue Tiffany, Sprint Nextel, presented the attached revised process addressing Action Item 0507-09.



PIM 56 Update  
V2.doc

- Text for inclusion in the LNPA WG's NP Best Practices document will be finalized at the July 2007 LNPA WG meeting.

PIM 60 Follow-up (Action Items 0507-05 and 0507-06) (All):

- PIM 60, submitted by Socket Telecom, requests that the LNPA WG provide an opinion on whether or not a customer, who is physically relocating to a different Rate Center, should be allowed to port their number. Socket wants to port a customer from another provider and add an FX component to the customer's service. The customer is relocating to a different rate center but wants to keep their number associated with the old rate center.

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.



PIM 60.doc

- 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.
- Consensus was reached that the bullets listed in Action Item 0507-05 will serve as the caveats in order for the LNPA WG to consider the port request addressed in PIM 60 to be a legitimate port request. PIM 60 and these bullets will be incorporated into the LNPA WG NP Best Practices document. The bullets will be made generic such that the providers involved will not be specified. This new Best Practices item will be reviewed and finalized at the July 2007 LNPA WG meeting.

Action Item 0507-06: Regarding the attached PIM 60, Gary Sacra, LNPA WG Co-Chair, will respond via e-mail to Century Tel's request to modify the April 2007 meeting minutes to document their objections.

NOTE: This Action Item was completed on 5/14/07. The response to Century Tel indicated that their comments will be documented in the May 2007 LNPA WG minutes since they were discussed during the May 2007 meeting.

Status of Event ID Rollover Issue (Action Item 0507-11):

Action Item 0507-11: Regarding any local system changes required to address the Event ID rollover issue as defined in NANC 413, Local System Vendors and Service Providers are to provide a monthly status on the implementation of this change until complete.

- Local System Vendors and Service Providers will continue to provide a status report of the implementation of any necessary changes at the July 2007 meeting.

NANC 419 Review (NeuStar):



NANC 419 for Jun  
2007 LNPAPWG con c

- The group reviewed the attached NANC 419 Change Order, which addresses User Prioritization of Recovery-Related Notifications. The group agreed to accept this proposed Change Order for requirements development. This will be further discussed at the July 2007 APT meeting.

OBF Issue 2943 Discussion (All):

- The group agreed to keep PIMs 42 and 44 open awaiting the official disposition of Issue 2943 from the OBF.

*Next LNPA Meeting ... July 10-12, 2007, Monterey, California – Hosted by NeuStar*



**EXHIBIT D**

**JULY DRAFT LNPA MINUTES**

**LNPA WORKING GROUP**  
**July 2007 Meeting**  
**Draft Minutes**

<b>Monterey, California</b>	<b>Host: NeuStar</b>
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**TUESDAY 07/10/07**

Tuesday, 07/10/07, Attendance:

Name	Company	Name	Company
Tina Plaisance	Alltel (phone)	Paul LaGattuta	NeuStar
Joe Cudo	Alltel (phone)	Dave Garner	NeuStar
Ron Steen	AT&T	Mike Panis	NeuStar
George Guerra	AT&T	Mike Whaley	Qwest (phone)
Renee Dillon	AT&T Mobility	Mary Retka	Qwest
Adele Johnson	AT&T Mobility	Howard Hawbaker	Smartcom Telephone (phone)
Marian Hearn	Canadian Consortium	Matt Kohly	Socket (phone)
Cal Shimshaw	Century Tel (phone)	Donnie Bennett	South Central Tel. (phone)
Nancy Sanders	Comcast (phone)	Kyle Jones	South Central Tel. (phone)
Joan Ferrance	Consolidated Comm. (phone)	Dave Davis	South Central Tel. (phone)
Chris Brown	Cox	Lavinia Rotaru	Sprint Nextel
Vicki Goth	Embarq	Rosemary Emmer	Sprint Nextel
Liz Gray	ESCI (phone)	Susan Tiffany	Sprint Nextel
Jane Jackson	Evolving Systems	Doug Babcock	Syniverse (phone)
Therese Mooney	Global Crossing (phone)	Adam Newman	Telcordia
Crystal Hanus	GVNW (phone)	Pat White	Telcordia
Dennis Robins	Integra Telecom (phone)	Neil Clessen	Three River Telco (phone)
Stephanie Reynolds	Nationsline (phone)	Paula Jordan	T-Mobile
Tina Tyree	Nationsline (phone)	Mohamed Samater	T-Mobile
Lynette Khirallah	NetNumber (phone)	Ron Maby	Veracity Comm. (phone)
Jim Rooks	NeuStar	Marty Rich	Veracity Comm. (phone)
Ed Barker	NeuStar	Chipp Nelson	VeriSign
Charles Ryburn	NeuStar	Gary Sacra	Verizon
Syed Saifullah	NeuStar	Earl Scott	Verizon (phone)
Shannon Sevigny	NeuStar Pooling (phone)	Jason Lee	Verizon (phone)
John Nakamura	NeuStar	Deb Tucker	Verizon Wireless
Stephen Addicks	NeuStar (phone)	Sara Hooker	Verizon Wireless (phone)

Larry Vagnoni	NeuStar	Tom Zablocki	Vonage (phone)
Marcel Champagne	NeuStar	Scotty Terry	Windstream (phone)

Attached are the Action Items assigned at the July, 2007 LNPA meeting. Also included are the remaining open Action Items from previous meetings.



JULY 2007 LNPA  
ACTION ITEMS.doc

**NOTE: ALL ACTION ITEMS REFERENCED IN THE MINUTES BELOW HAVE BEEN CAPTURED IN THE “JULY 2007 LNPA ACTION ITEMS” FILE ATTACHED ABOVE.**

**MEETING MINUTES:**

2007 LNPA WG Meeting/Call Schedule:

Following is the meeting schedule for the 2007 LNPA Meetings and calls.

MONTH/ DATE (2007)	NANC	LNPA-WG	HOST	LOCATION
January	TBD	9 <sup>th</sup> -11 <sup>th</sup>	Cingular	Jackson, Mississippi
February	TBD	No meeting. 2/12/07 call from 3pm to 5pm Eastern time, dial-in bridge number is 888-412-7808, pin 23272#		
March	TBD	13 <sup>th</sup> -15 <sup>th</sup>	Comcast	Denver, Colorado
April	TBD	No meeting. 4/10/07 call from 10am to 6pm Eastern time, dial-in bridge number is 888-412-7808, pin 23272#		
May	TBD	8 <sup>th</sup> -10 <sup>th</sup>	Canadian Consortium	Banff, Canada
June	TBD	No meeting. 6/12/07 call from 1pm to 5pm Eastern time, dial-in bridge number is 888-412-7808, pin		

		23272#		
July	TBD	10 <sup>th</sup> -12 <sup>th</sup>	NeuStar	Monterey, California
August	TBD	No meeting. 8/7/07 call from 1pm to 4pm Eastern time, dial-in bridge number is 888-412-7808, pin 23272#		
September	TBD	11 <sup>th</sup> -13 <sup>th</sup>	Verizon Wireless	Franklin, Tennessee
October	TBD	No meeting. 10/9/07 call if necessary		
November	TBD	13 <sup>th</sup> -15 <sup>th</sup>	Sprint Nextel	Ft. Lauderdale, Florida
December	TBD	No meeting. 12/11/07 call if necessary		

- Continuing evaluation during 2007 will determine if interim conference calls are needed or if the decision to meet face-to-face every other month should be revisited.

05/07 Meeting Minutes Review:

- No changes were made to the Draft May 2007 LNPA WG minutes and they were accepted as Final.

06/07 Call Minutes Review:

- No changes were made to the Draft June 2007 LNPA WG minutes and they were accepted as Final.

OBF LSOP Committee Update

- No report was given at this meeting. Carol Frike, Sprint Nextel, has replaced Steve Moore and will provide LSOP readouts at future LNPA WG meetings.

OBF Wireless Committee and Intermodal Subcommittee Update (Deb Tucker, Verizon Wireless and OBF Wireless Committee Co-Chair):

Industry Numbering Committee (INC) Update (Adam Newman, Telcordia & INC Vice Chair):

- INC Issue 510: Video Relay Service (VRS) Alternatives – INC continues to work on a recommendation report to NANC. The report will be a three-part analysis – the way in which NANP numbers will be assigned and used by VRS providers, and an analysis of two potential database solutions (1. NPAC or 2. DNS-based). The INC

VoIP Subcommittee will be meeting twice a week until August to produce a final draft of the report.

- INC Issues 515, 535, and 543 affect the COCAG and TBPAG and are being worked together. All of these issues address abandoned or returned 1K blocks so a single contribution is now addressing all three.
  - Issue 515: The NAPM LLC has granted permission for an NPAC report. The PA has access to that information.
  - Issue 535 looks to add information on the Part 1A form for contamination levels of returned blocks.
  - Issue 543 updates COCAG for abandoned or returned blocks recognizing the PA's new access to NPAC data.
- INC Issue 528: Liaison from NIIF/NIOC regarding testing and code opening guidelines. The TBPAG guidelines will reflect that SPs opening a new code in a pooling environment should perform the code opening testing that is referenced in the NIIF guidelines. A liaison will go to NIIF asking if that meets their needs.
- INC Issue 532: At the last INC meeting, INC sent a letter to Kinsale Mobile stating that their responses to INC's questions did not meet the criteria for assignment and that INC would reject their request unless the additional information requested was provided.
- INC Issue 539 addresses clarification of Section 8.3.6. This issue is still being worked.
- INC Issue 541 addresses how to protect against the porting of numbers from 1K blocks donated to the pool. A change to Section 7.2.7 of the TBPAG will remind SPs not to keep donated 1K blocks in their inventory and not to port or assign numbers in 1K blocks that have been donated to pool.

NANC Future of Numbering (FoN) Working Group Update (Adam Newman, Telcordia and FoN Co-Chair):

- Adam Newman, Telcordia and FoN Co-Chair, provided an update of the NANC FoN Working Group.
- The FoN is working on four accepted issues based on their AID form.
  - Analysis of commons and property rights models for the allocation of NANP resources – should we move to an open market model
  - Telematics services, e.g., OnStar, and the use of NANP numbers
  - Geographic link to NANP resources and assignment – impact to services
  - New and future services brief – analyzing impact of number assignment policy and exhaust on new and future services

Wireless Testing Subcommittee (Mohamed Samater, T-Mobile and WTSC Co-Chair):

- Mohamed Samater, T-Mobile and WTSC Co-Chair, reported that the WTSC held calls on May 18<sup>th</sup> and June 8<sup>th</sup>.
- The Subcommittee is focused on finalizing the WICIS 3.1 test document, which is almost complete. This will be discussed further on the July 19<sup>th</sup> WTSC call.
- WICIS will be converted from CORBA to XML in Release 4.0. Further discussion of this activity will also take place on the July 19<sup>th</sup> WTSC call.
- WICIS 3.1 testing will start on 8/20/07.

Architecture Planning Team (APT) Readout (Jim Rooks, NeuStar):

- Jim Rooks, NeuStar, reported on the May 2007 APT meeting.
- The APT group reviewed and discussed the following Change Orders at the May 2007 APT meeting:
  - NANC 349 – Off-line batch process. Concerns still exist over the synchronization of all provider systems and network elements for modifies of routing-related data. Batch processing is probably not applicable to routing fields. The APT will continue to discuss this Change Order.
  - NANC 372 – Alternatives to CMIP protocol. The group agreed that we need to put together a business case to cost justify any migration to another protocol such as SOAP/XML.
  - NANC 419 – Recovery notification prioritization. The Change Order was accepted. Options for a prioritization approach will be discussed at the July APT meeting.
  - NANC 397 – The group continues to discuss the proposal to support 25K activates in an hour.

PIM Discussion:

- PIM 32 - This PIM, submitted by Syniverse (formerly TSI), seeks to address issues related to the process for obtaining a Customer Service Record (CSR), which contains information necessary to complete a Local Service Request (LSR) for porting in a reseller number.



PIM 32v4.doc

The following resolution text for PIM 32 was approved for inclusion as Item 48 in the LNPA WG's NP Best Practices document.

PIM 32 seeks to address issues related to the process of obtaining a Customer Service Record (CSR) for wireline reseller customers. The CSR contains information necessary to complete a Local Service Request (LSR) for porting a wireline number. In some cases, carriers are not able to obtain an end user's specific CSR information from some wireline network service providers when attempting to port telephone numbers (TNs) associated with reseller accounts. For example, two of four RBOCs refuse to send the CSR information to the New Local Service Provider (NLSP) because they have been instructed by their resellers not to share the end user's specific information which the resellers consider to be proprietary.

This is a critical problem. For those reseller errors where there is a workaround, many of the port requests are significantly delayed before completion. In some cases there are no workaround solutions and end users who want to port their number cannot. Those customers either give up on porting their number, or cannot keep their number and must change to a new number. It is not always possible to work with the resellers to obtain the information needed to populate the LSR. It is often difficult to find someone with the reseller that can support a port and provide the needed information.

The failure to port wireline reseller TNs can be resolved. Direction by resellers to Old Network Service Providers (ONSPs) to provide the specific customer information where possible would greatly reduce the unsuccessful ports. Resellers should not be allowed to withhold end user specific customer information necessary for the porting process.

At the April 17, 2007 NANC meeting, the LNPA WG submitted this final Position Paper in order to bring the LNPA WG's consensus position to the attention of the NANC and the FCC.

PIM 32 was closed at the July 2007 LNPA WG meeting.

- PIM 42 – This PIM, submitted by Syniverse, seeks to review the wireline requirement for certain fields on the LSR.



PIM42 v2.doc

The LNPA WG is awaiting a letter from the OBF on the disposition of OBF Issue 2943 before determining how to proceed with PIM 42.

- PIM 44 – This PIM, submitted by T-Mobile, Sprint, Verizon Wireless, Nextel, Cingular, and US Cellular, seeks to address varying rules among wireline carriers for developing a Local Service Request (LSR) in order to port a number.



"PIM 44.doc"

The LNPA WG is awaiting a letter from the OBF on the disposition of OBF Issue 2943 before determining how to proceed with PIM 44.

- PIM 50 – This PIM, submitted by Syniverse, seeks to address instances where wireline to wireless ports fail the automated process because they are from large accounts where the Customer Service Record (CSR) is too large to return on a CSR query.



PIM 50.doc

The following resolution text for PIM 50 was approved for inclusion as Item 46 in the LNPA WG's NP Best Practices document.

There have been instances where wireline to wireless ports fail the automated process because they are from large accounts where the Customer Service Record (CSR) is too large to return on a CSR query.

At the November 2006 NANC meeting, NANC recommended that carriers should be following the OBF guidelines. The OBF LSOG guidelines have options for providing a CSR for a TN with or without directory, or the entire account with or without directory. If wireline carriers sent only the information requested in the customer inquiry per the LSOG CSI guidelines, this error would be greatly reduced if not eliminated.

PIM 50 was closed at the July 2007 LNPA WG meeting.

- PIM 51 – This PIM, submitted by Nextel, seeks the prevention of NXX codes being opened to portability in NPAC by the incorrect provider.



PIM 51.doc

NeuStar developed Change Order 414 proposing an automated process to prevent the wrong service provider from opening up a code in NPAC. PIM 51 is now tracking NANC 414 for the automated solution.

Regarding the attached manual process for the PIM 51 cleanup in NPAC, Gary Sacra, LNPA WG Co-Chair, will notify the NAPM LLC that the LNPA WG reached consensus at their May 2007 meeting to recommend to the LLC that they request a Statement of Work (SOW) for the manual process from NeuStar. Gary, as LNPA WG Co-Chair, will send a formal request to the LLC.





PIM 51  
Subcommittee Recom

- PIM 52 – This PIM, submitted by Sprint Nextel, seeks to address issues related to carriers receiving 1K blocks from the pool in which the Intra-Service Provider ports have not been completed by the donor provider prior to block donation to the pool.



PIM 52 v3.doc

The LNPA WG drafted the attached liaison to the INC requesting revisions to the TBPAG Appendix 2 block donation form suggesting questions to prompt the donating service provider to perform any necessary Intra-Service Provider ports, if applicable, and protect numbers in the block to be donated from further assignment by the donating provider. The INC accepted this issue (INC Issue 506).



Unusable Block  
Letter to INC v3.doc

As part of INC Issue 506, the INC made changes to the Thousands Block PA Guidelines and form. PA Change Order 51 was approved and implemented in May.

PIM 52 was closed at the July 2007 LNPA WG meeting.

- PIM 54 – This PIM, submitted by Comcast, seeks to reduce the interval for certain wireline-wireline and inter-modal ports to one day.



PIM 54v2.doc

Action Item 0906-12: **Nancy Sanders**, Comcast, will determine if Comcast will revise the attached PIM 54 to reflect the scope of the work undertaken by the LNPA WG's Pre-Port Subcommittee.

Action Item 0906-12 remains open.

The pre-port interval is being addressed in the Pre-port Subcommittee. The subcommittee will propose minor changes to the flows and narrative.

- PIM 55 – This PIM, submitted by the NeuStar Clearinghouse Vendor, seeks to address issues related to wireline Provider Initiated Activity.



PIM 55 v2.doc

This issue is now in a tracking state awaiting inclusion in the next WICIS Release beyond 4.0, which will likely be deployed sometime in 2009. NeuStar Clearinghouse will submit a contribution.

- PIM 56 – This PIM, submitted by Sprint Nextel, seeks to address instances where LNP database updates are not always propagated by all providers down to their network element routing databases in a timely manner.



PIM 56 v2.doc

Action Item 0307-11: Related to Action Item 0307-13, Sue Tiffany, Sprint Nextel, will review and compare the attached NIIF document with the attached draft Sprint Nextel contribution for PIM 56 for possible revision of the contribution.



NIIF  
atis0300082.pdf



PIM 56 Process  
(2).doc

Sue Tiffany, Sprint Nextel, reported that there is no conflict with these proposed process steps and the NIIF document. Action Item 0307-11 is closed.

Action Item 0507-09: Regarding the attached draft process addressing PIM 56, Sue Tiffany, Sprint Nextel, will revise the document to add a step between Steps 2 and 3 stating that the NNSP checks to make sure that NPAC data is correct. The PIM 56 issue and the resolution steps will be placed in the NP Best Practices document when finalized. This will be reviewed and finalized on the June 12<sup>th</sup> conference call.



PIM 56 Process  
(2).doc

Sue Tiffany, Sprint Nextel, presented the revised draft process adding the step per Action Item 0507-09. The Action Item is closed.



PIM 56 Update  
V2.doc

Regarding the attached PIM 56 and the attached associated draft process for addressing the issue, Sue Tiffany, Sprint Nextel, will revised Step 4 in the process to read, “NSP reports the problem to the Telco that is routing calls incorrectly, for example, incorrect LRN, SCP/STP is discrepant with NPAC, etc.”, and send the revised draft to the LNPA WG Co-Chairs.

The group then reviewed the attached draft letter, prepared by Sue Tiffany, Sprint Nextel, from the LNPA WG to the NIIF, requesting NIIF permission to place the link to their *Guidelines for Reporting Local Number Portability Troubles in a Multiple Service Provider Environment* – ATIS-0300082 NIIF 0004 in the LNPA WG's NP Best Practices document.



NIIF Letter 0707.doc

Regarding the attached draft letter to NIIF from the LNPA WG, **Sue Tiffany**, Sprint Nextel, will revise the draft letter as follows and submit it to the LNPA WG Co-Chairs.

1. Change Step 4 in the attached to read, “NSP reports the problem to the Telco that is routing calls incorrectly, for example, incorrect LRN, SCP/STP is discrepant with NPAC, etc.”
2. Include the e-mail addresses of the NIIF leadership in the attached.

The LNPA WG will await permission from NIIF to put their document link in our Best Practices. PIM 56 will remain open.

- PIM 57 – This PIM, submitted by Cingular and Sprint Nextel, seeks to address porting issues that occur when a Reseller discontinues business and/or declares bankruptcy.



PIM 57 v3.doc

Cingular has developed a port authorization form that they are going back to get their resellers to sign so that if they go out of business, they can legally port the customers. The attached form was presented by Cingular at the March 2007 LNPA WG meeting.



Authorization Form  
v1.doc

Sprint Nextel has created a checklist to encourage their resellers not to abandon their customers and provide them with options. This checklist was presented by Sue Tiffany, Sprint Nextel, at the March 2007 LNPA WG meeting.



Revised Bankruptcy  
Checklist.doc

**Action Item 0307-17: Regarding the attached PIM 57, **Service Providers** are to review the attached contributions from Cingular (Authorization Form v1.doc) and Sprint Nextel (Revised Bankruptcy Checklist.doc) for discussion at the May 2007 LNPA WG meeting.**

The group reviewed the attached authorization form and checklist. Action Item 0307-17 remains open.

Regarding the attached PIM 57 and checklist, **Sue Tiffany**, Sprint Nextel, **Deb Tucker**, Verizon Wireless, and **Adele Johnson**, at&t, will revise and generalize the attached checklist such that it is not carrier-specific.

- PIM 58 – This PIM, submitted by BellSouth and Verizon, seeks to address instances where the LERG assignee of an NXX code has not opened a code to portability in NPAC, and either cannot be contacted to do so, or refuses to do so.



PIM 58 v3.doc

The following resolution text for PIM 58 was approved for inclusion as Item 45 in the LNPA WG's NP Best Practices document.

There have been instances where the LERG assignee of an NXX code has not opened a code to portability in NPAC, and either cannot be contacted to do so, or refuses to do so.

Individual circumstances may vary depending on the situation. In some cases, the NXX may have been opened for portability in the LERG but not in the NPAC SMS. In other cases, the NXX may not have been opened for portability in the LERG or the NPAC SMS. It may be that if the NSP or the NPAC Administrator contacts the OSP, the situation will be resolved. But in those situations where the OSP can't be contacted or refuses to cooperate, the following procedure should be followed:

1. The NSP should document attempts to contact the OSP to request that the NXX be opened in the NPAC SMS.
2. If the NSP attempts to make contact are unsuccessful, the NSP should contact the NPAC Administrator. The NPAC Administrator should attempt to contact the OSP to request that the code be opened in the NPAC SMS. Attempts should be documented.
3. If neither the NSP nor the NPAC Administrator can make contact with the OSP or if the OSP refuses to cooperate, the NSP should contact the appropriate regulatory authorities for assistance. The NSP should provide details to the regulatory authority including the Service Provider Identification (SPID) of the OSP who should have opened the code.
4. The regulatory authority may convince the OSP to open the code, or may authorize the NPAC Administrator to open the code to portability in the NPAC SMS. Any such authorization directed to the NPAC Administrator shall include the NSP-provided SPID of the code holder under which the code shall be opened in the NPAC. Upon receipt of such regulatory

authorization, the NPAC Administrator shall proceed with opening the code in the NPAC SMS.

5. The OSP should have the LERG updated to show the code as portable if it does not already do so.

PIM 58 was closed at the July 2007 LNPA WG meeting.

- PIM 59 – This PIM, submitted by the NeuStar Clearinghouse Vendor, seeks to address issues related to the unlocking of the 911 database when numbers are ported to VoIP providers.



PIM 59.doc

Text for the NP Best Practices document was accepted on the June 12<sup>th</sup> LNPA WG conference call. PIM 59 was closed on the June 12<sup>th</sup> call.

- PIM 60 – This PIM, submitted by Socket Telecom, requests that the LNPA WG provide an opinion on whether or not a customer, who is physically relocating to a different Rate Center, should be allowed to port their number.



PIM 60.doc

**Gary Sacra**, LNPA WG Co-Chair, will revise the bullets accepted at the May 2007 LNPA WG meeting, which serve as the LNPA WG's consensus criteria for the PIM 60 porting scenario to be considered a legitimate scenario in the eyes of the LNPA WG, to read as follows (revisions are in red):

- The customer would like to receive calls to their number(s) at a location of theirs that is physically outside of the Rate Center associated with their number(s).
- The customer understands that these numbers must continue to be rated in accordance with the Rate Center currently associated with their number(s) and does not want them to take on the rating characteristics of the Rate Center of their new location.
- The New Service Provider already serves the Rate Center associated with the customer's number(s) out of the same switch to which they want to port this customer's number(s).
- The New Service Provider switch that already serves the Rate Center of the customer's number(s) has an existing POI at the ILEC's tandem over which calls to these numbers are routed. If this customer's number(s) are ported into the New Service Provider switch, they would be routed over the same POI, and then the New Service Provider would deliver the calls to the customer's premise that is located outside of the Rate Center associated with the customer's Number(s).

- The New Service Provider offers a tariffed and/or publicly published foreign exchange (FX) service in accordance with regulatory requirements that would cover this situation. Calls to and from customers located in the Rate Center associated with these ported numbers and the customer served by the New Service Provider will be routed exactly the same whether the New Service Provider assigns the customer a phone number from its 1K block of numbers in that Rate Center or whether the New Service Provider ports the numbers. This customer will be served out of the New Service Provider's tariffed and/or publicly published FX service offering in accordance with regulatory requirements.
- The LSR submitted by the New Service Provider reflects the customer's original service location as recorded by the Old Service Provider.

These revisions will be made in the NP Best Practices document.

Century Tel, Windstream, and South Central objected to the wording of the criteria, stating that they feel that they cover all forms of Virtual NXX and do not include all necessary criteria. Alltel abstained. There were no objections to removing the caps on "Foreign Exchange," but the acronym "FX" will remain capitalized. PIM 60 was closed with Century Tel and Windstream objecting to its closure.

- NEW PIM 61 – This PIM, submitted by South Central Rural Telephone Coop. Corp. Inc., Duo County Telephone Cooperative Corp., Inc, North Central Rural Telephone Coop., and PNG Telecommunications, seeks to have implemented a VPN access solution for LTI users.



PIM 61.doc

PIM 61 was teed up by Donnie Bennett from South Central Telephone. It was suggested that another possible solution could be a secured website access over a broadband internet connection. NeuStar stated that it would not be appropriate to put a portion of the network over the vulnerable internet. A VPN access solution requires substantial hardware to support U.S. LTI users. PIM 61 was accepted. There were no objections to making a technical recommendation to the NAPM LLC to request an SOW from NeuStar. Gary Sacra, LNPA WG Co-Chair, will:

1. Change the Problem/Issue Statement to read, "Out-dated dialup access to the LTI (Low Tech Interface) producing slow and unreliable compliances with mandated FCC number porting requirements and procedures.
  2. Send a recommendation to the NAPM LLC to request an SOW from NeuStar for a VPN access solution for LTI users.
- NEW PIM 62 – This PIM, submitted by Verizon Wireless, seeks to address the duration of some porting outages due to planned service provider maintenance, and the notification requirements for planned maintenance outages.



PIM 62.doc

PIM 62 was teed up by Deb Tucker, Verizon Wireless. PIM 62 was accepted by the group. **Service Providers** are to review the PIM internally and come to the August 7<sup>th</sup> LNPA WG conference call prepared to discuss any proposed revisions.

Pre-Port Subcommittee (Sue Tiffany – Sprint Nextel/Nancy Sanders – Comcast):

- Sue Tiffany, Sprint Nextel, and Nancy Sanders, Comcast, provided a readout of current Pre-Port Subcommittee activities.
- Sue Tiffany, Sprint Nextel, stated that the Subcommittee made suggested changes to the main flows and is continuing to work on minor changes for resellers and Type 1s.
- Nancy Sanders, Comcast, stated that the Subcommittee was supposed to be looking into how the porting interval could be shortened. Subcommittee members have an action item to bring back best practices that they have experienced with other carriers that could be brought to the LNPA WG for possible inclusion in the NP Best Practices document.

Review of NP Best Practices Document (All):

- **Gary Sacra**, LNPA WG Co-Chair, will send the attached revised NP Best Practices document to Mohamed Samater, T-Mobile, for inclusion on the LNPA WG’s website, after removal of the yellow highlighting.



LNPA\_NP\_Best\_Practices\_07-10-2007 v2.c

- Upon receipt of the revised NP Best Practices document from Gary Sacra, LNPA WG Co-Chair, **Mohamed Samater**, T-Mobile, will have the HTML version of the document uploaded onto the LNPA WG’s website.
- **Gary Sacra**, LNPA WG Co-Chair, will send a notice to Tom Koutsky, NANC Chair, that consensus was reached in the LNPA WG to add the resolutions of PIMs 32 and 50, and the 24 hour FOC issue, to the NP Best Practices document.

SPID Stability Update (NeuStar):



LNPA Report - July 2007.ppt

- The attached presentation, reflecting outbound flow control events, was given by NeuStar. NeuStar stated that the data shows steady improvement and that they do not see a problem.

- NeuStar said that increasing the large port threshold to 10K did not increase the flow control frequency and that is the message that we can take from this data.
- NeuStar is recommending another exercise at 15K to be run around mid-October.
- NeuStar will continue to monitor SPID stability.
- **NeuStar** will provide an explanation at the September 2007 meeting as to why the quantities of outbound flow control events are not cause for concern.

Annual Failover Exercise Planning (NeuStar):



Detailed Timeline of Fail Over Exercise Oc

- For the annual failover exercise, NeuStar is recommending a 10/20-10/21 date.
- The LNPA WG agreed to the recommended date and agreed to establish a SPID migration blackout for 10/21.
- **NeuStar** will issue a Cross-Regional notification announcing that October 21, 2007 has been designated as a SPID migration blackout date due to the annual failover exercise.

**WEDNESDAY 07/11/07**

Wednesday, 07/11/07, Attendance:

Name	Company	Name	Company
Tina Plaisance	Alltel (phone)	Paul LaGattuta	NeuStar
Ron Steen	AT&T	Dave Garner	NeuStar
George Guerra	AT&T	Mike Panis	NeuStar
Renee Dillon	AT&T Mobility	Mike Whaley	Qwest (phone)
Adele Johnson	AT&T Mobility	Mary Retka	Qwest
Marian Hearn	Canadian Consortium	Lavinia Rotaru	Sprint Nextel
Chris Brown	Cox	Rosemary Emmer	Sprint Nextel
Vicki Goth	Embarq	Susan Tiffany	Sprint Nextel
Jane Jackson	Evolving Systems	Colleen Collard	Tekelec (phone)
Therese Mooney	Global Crossing (phone)	Adam Newman	Telcordia
Lynette Khirallah	NetNumber (phone)	Pat White	Telcordia
Jim Rooks	NeuStar	Paula Jordan	T-Mobile
Ed Barker	NeuStar	Mohamed Samater	T-Mobile



Charles Ryburn	NeuStar	Chipp Nelson	VeriSign
Syed Saifullah	NeuStar	Gary Sacra	Verizon
Shannon Sevigny	NeuStar Pooling (phone)	Earl Scott	Verizon (phone)
John Nakamura	NeuStar	Jason Lee	Verizon (phone)
Stephen Addicks	NeuStar (phone)	Deb Tucker	Verizon Wireless
Marcel Champagne	NeuStar	Sara Hooker	Verizon Wireless (phone)
		Tom Zablocki	Vonage (phone)

## **MEETING MINUTES:**

### Review of NIIF Correspondence (All):

- The group reviewed the attached correspondence from the NIIF announcing their consideration to close NIIF Issue #248, NIIF 0004, Guidelines for Reporting Local Number Portability Troubles in a Multi-Service Provider Environment, Updates.



07050301.pdf

- After reviewing the correspondence, there were no objections in the LNPA WG to its closure.
- **Gary Sacra**, LNPA WG Co-Chair, will send a response to the NIIF leadership that the LNPA WG concurs with the closure of NIIF Issue # 248.

### Change Management Discussion (NeuStar):



NANC Change  
Orders 07-01-07 - ch

- NANC 372
  - The group briefly recapped the May 2007 APT discussion that took place regarding NANC 372. NANC 372 will be discussed further during the July 2007 APT meeting.
    - The IT industry is generally moving towards an XML/SOAP interface. However, there are performance issues and questions. Message size would be greatly increased. Need to investigate compression capabilities.

- It will be worth pursuing for the long term. Not sure what is next step. Need to find a business driver for pursuing this.
  - The WICIS transfer is planning on implementing a flash-cut to XML (Sep '08). Plan is to continue to support CORBA interface for testing purposes only. Keep this in mind when planning the NPAC implementation.
  - The group will discuss more during the Jul '07 APT meeting, including pros/cons analysis, LOE, and any input on the business case.
- NANC 413 – 32-bit signed integer:
  - NANC 413 clarifies what the minimum and maximum values are and what takes place during rollover. Behavior clarification text is added to the GDMO.

- NANC 414



NANC 414 for PIM51  
v3-change bars.doc

- **Service Providers** are to submit their SPID to OCN relationships to Steve Addicks ([Stephen.addicks@neustar.biz](mailto:Stephen.addicks@neustar.biz)), indicating if they have any cases where an OCN is associated with more than one SPID. If yes, this means that we cannot have an edit preventing a provider from associating another provider's OCN to their SPID. It was proposed that an audit that could identify cases where an OCN is associated with more than one SPID that would alert NPAC personnel so that it could be verified. The M&P could state that anything other than a one-to-one relationship would spit out to be verified by NPAC personnel.
- Action Item 0507-10: Regarding the attached NANC 414 which proposes an automated NPAC mechanism to prevent the wrong provider from opening up an NXX code in NPAC, **Local System Vendors** are to determine if the required OCN to SPID mapping, which would be part of the SP Profile in NPAC, should be modifiable over the CMIP interface.
- Action Item 0507-12: Regarding the attached NANC 414 which proposes an automated NPAC mechanism to prevent the wrong provider from opening up an NXX code in NPAC, **Service Providers** are to determine if the required OCN to SPID mapping, which would be part of the SP Profile in NPAC, should be modifiable over the CMIP interface.
  - Verizon, Verizon Wireless, AT&T, AT&T Mobility, and T-Mobile stated that they are not in favor of modifying the OCN to SPID mapping over the CMIP interface. They stated that this could be done

via the GUI by NPAC personnel instead. Action Items 0507-10 and 0507-12 are closed.

- NANC 422 is a Doc Only Change Order that updates the current IIS documentation to be consistent and reflect the current behavior relative to Subscription Version Queries, for the enhanced SV Query functionality over the SOA/LSMS interfaces.
- NANC 419, Notification Prioritization, was accepted by the group for further requirements development.
- Event Id Rollover Issue:
  - Action Item 0507-11: Regarding any local system changes required to address the Event ID rollover issue as defined in NANC 413, **Local System Vendors and Service Providers** are to provide a monthly status on the implementation of this change until complete.
    - Tekelec will deliver their software to their customers in August.
    - Evolving Systems has delivered their software to their customers.
    - Telcordia does not require a change.
    - Syniverse does not require a change.
    - VeriSign will be complete by end of August.
    - Cox will be complete by end of August.
    - Verizon Business is complete now.
    - Embarq will be complete by end of August.
    - NetNumber is complete now.
    - Another update will be on the August conference call agenda.
- SPID Migration Discussion
  - Action Item 0507-01: **NeuStar** is to determine how much of a delay in creating and delivering SPID migration SMURF files will result if they have a late cancellation of a provider's migration out of a set of SMURF files. The scenario to be analyzed is 5 providers are doing migrations and one of them is cancelled at 11:45pm the Saturday night before the migration.
    - NeuStar stated that cancellation of a migration that late will not affect delivery of SMURF files. Note that any pending SVs have already been cancelled and must be re-established. Action Item 0507-01 is closed. Verizon Wireless stated that they are very interested in automating the SPID migration process. This will be further explored in the APT.
- NANC 299

- Action Item 0507-14: NPAC Release 3.3 implemented a heartbeat message that contains a sequence number that NPAC treats independently from the sequence number contained in the LNPAAccessControl. Some provider SOA and LSMS systems consider them to be the same sequence number. NeuStar will add flags in the SP profile in NPAC indicating whether or not the provider systems consider them to be the same and react accordingly. This is planned for an NPAC Point Release in June. **Service Providers** are to check to see if they support the Application Level Heartbeat message and ensure that their profile in NPAC is consistent.
  - Verizon stated that they support the heartbeat message and their profile reflects that. Telcordia does not send heartbeat but supports receiving and responding to heartbeat from NPAC. The SP Profile is applicable to local the system supporting receiving the heartbeat from NPAC and responding to it. Sprint Nextel stated that they support the heartbeat message and is checking to see that their profile is consistent.

2007 Meeting/Call Schedule (All):

- Attached is the current 2007 LNPA WG schedule.



2007 LNPA WG  
Meeting and Call Sche

Discussion of Need for August Conference Call (All):

- It was agreed to hold a call on August 7<sup>th</sup> from 1pm to 4pm eastern. The bridge number is **888-412-7808 PIN 23272#**
- The agenda will consist of:
  - Status of PIMs 42 and 44 in light of OBF Issue 2943
  - PIM 62 Discussion
  - Status of Event ID Rollover Issue
  - 2008 Meeting and Call Schedule/Hosts/Locations
  - New Business

Development of NANC Report (Gary Sacra / Paula Jordan – LNPA WG Co-Chairs):

- The next NANC meeting has not been scheduled at this time.
- **Gary Sacra**, LNPA WG Co-Chair, will send a notice to Tom Koutsky, NANC Chair, that consensus was reached in the LNPA WG to add the resolutions of PIMs 32 and 50, and the 24 hour FOC issue, to the NP Best Practices document.

Review of May 2007 LNPA WG Action Items:



**May 2007 LNPA WG Action Items:**

- Item 0507-01: This item has been completed and is Closed.
- Item 0507-02: This item has been completed and is Closed.
- Item 0507-03: This item remains Open.
- Item 0507-04: This item has been completed and is Closed.
- Item 0507-05: This item has been completed and is Closed.
- Item 0507-06: This item has been completed and is Closed.
- Item 0507-07: This item remains Open.
- Item 0507-08: This item has been completed and is Closed.
- Item 0507-09: This item has been completed and is Closed.
- Item 0507-10: This item has been completed and is Closed.
- Item 0507-11: This item remains Open.
- Item 0507-12: This item has been completed and is Closed.
- Item 0507-13: This item remains Open.
- Item 0507-14: This item remains Open.

**May 2007 APT Action Items:**

- Item 0507-15: This item has been completed and is Closed.
- Item 0507-16: This item remains Open.
- Item 0507-17: This item has been completed and is Closed.
- Item 0507-18: This item has been completed and is Closed.

**LNPA WG Action Items Remaining Open from Previous Meetings:**

- Item 0605-22: This item remains Open.
- Item 0706-06: This item remains Open.
- Item 0906-12: This item remains Open.
- Item 0906-14: This item remains Open.
- Item 0307-08: This item has been completed and is Closed.
- Item 0307-09: This item has been completed and is Closed.
- Item 0307-10: This item has been completed and is Closed.
- Item 0307-11: This item has been completed and is Closed.
- Item 0307-17: This item remains Open.

**APT Action Items Remaining Open from Previous Meetings:**

- Item 0307-24: This item has been completed and is Closed..

**Review of June 2007 Action Items:**

- No Action Items were assigned on the June 2007 LNPA WG conference call.

**Unfinished/New Business:**

- Paula Jordan, T-Mobile, stated that an SP had denied their port request because the customer had not been in service for 30 days and that they would port on the 31<sup>st</sup> day. She asked if there was anything in FCC Orders allowing this. The group was not aware of anything allowing this in FCC Orders.
- Paula Jordan, T-Mobile, stated that a Reseller customer had ported to T-Mobile and the customer was being double-billed because the Reseller was still billing. It was stated that T-Mobile is not responsible for telling customers that they must contact their old provider to stop billing. The process is such that the Reseller should be notified of the loss by their underlying network provider.

**THURSDAY 07/12/07**

**ARCHITECTURE PLANNING TEAM (APT) MEETING**

Thursday, 07/12/07, Attendance:

Name	Company	Name	Company
Tina Plaisance	Alltel (phone)	Paul LaGattuta	NeuStar
Ron Steen	AT&T	Dave Garner	NeuStar
George Guerra	AT&T	Mike Panis	NeuStar
Renee Dillon	AT&T Mobility	Mike Whaley	Qwest (phone)
Marian Hearn	Canadian Consortium	Lavinia Rotaru	Sprint Nextel
Chris Brown	Cox	Susan Tiffany	Sprint Nextel
Vicki Goth	Embarq	Adam Newman	Telcordia
Jane Jackson	Evolving Systems	Pat White	Telcordia
Lynette Khirallah	NetNumber (phone)	Paula Jordan	T-Mobile
Jim Rooks	NeuStar	Mohamed Samater	T-Mobile
Ed Barker	NeuStar	Chipp Nelson	VeriSign
Charles Ryburn	NeuStar	Gary Sacra	Verizon
Syed Saifullah	NeuStar	Earl Scott	Verizon (phone)
John Nakamura	NeuStar	Deb Tucker	Verizon Wireless
Stephen Addicks	NeuStar (phone)		
Marcel Champagne	NeuStar		

**APT MEETING MINUTES:**

APT Mission Statement: To assess Number Portability industry production technical issues within the purview of the LNPA Working Group and develop recommendations for the strategic direction of the Number Portability architecture.

The current edition of the APT will focus on end-to-end LNP performance, including production needs, large ports, and testing and certification.

NANC 349 Review (Action Item 0307-24) (All):

Action Item 0307-24: **APT Participants** are to review NANC Change Order 349, which proposes investigating a batch processing alternative to generating all messages associated with large porting activity and sending them across the interface, and come prepared to discuss at the May 2007 APT meeting.



NANC Change  
Orders 10-31-05.doc

- There was tentative agreement previously that a batch process is not suitable for updates of routing data. Batch in this context would be an off-line file similar to a

SMURF file that providers would load in their local systems based on their schedule. This is the definition of batch in NANC 349.

- AT&T Mobility is interested in the ability to do mass changes, such as DPC data and LRNs, in a shorter timeframe. A major merger took place previously and it took months to complete modification of CNAM DPC data. AT&T Mobility's definition of batch processing is a large amount of work, not necessarily an off-line process. Their stated interest is in achieving up to 100K modifications in an hour. It was stated that this is actually a NANC 397 business need.
- It was agreed that NANC 349 will be placed in delete pending. This discussion will continue in the NANC 397 discussion.
- Action Item 0307-24 is closed.

NANC 372 Review (Pros/Cons) (Action Item 0507-16, 17) (All):

Action Item 0507-16: Regarding the discussion of NANC 372, which proposes investigation of an alternative to the CMIP protocol, Sue Tiffany, Sprint Nextel, and Deb Tucker, Verizon Wireless, are to investigate if ATIS developed a business case to justify the migration from CORBA to SOAP/XML.

- Sue Tiffany, Sprint Nextel, stated that the ATIS Board of Directors directed the ATIS migration to XML in order to consolidate to a single protocol. She stated that it does not appear that a business case was developed. The OBF Committees began the migration and it is progressing slowly. Action Item 0507-16 remains open.

Action Item 0507-17: LNPA Working Group Participants are to review NANC 372 and the discussions that took place regarding its benefits/pros and cons for discussion at July 2007 APT meeting.

- If companies are moving to XML in their other systems, it was stated that CMIP could be an outlier in the future.
- Regarding NANC 372, Alternatives to the CMIP interface, Local System Vendors and Service Providers are to determine if their respective companies have embraced the ATIS migration to XML and, if so, what are the implications of staying on CMIP for the LNP application.
- Action Item 0507-17 is closed.

NANC 419 Discussion of Notification Prioritization (All):

- The group reviewed the current requirements and it was agreed that we would move the ongoing discussion and review to the full LNPA WG.



- Concern was raised about notifications coming out of order as a result of priority changes. This will be part of the ongoing discussion.

NANC 397 Review (Next Steps) (Action Item 0507-15) (All):

Action Item 0507-15: At the May 2007 APT meeting, with regard to NANC 397, it was stated that if we did not have an implied requirement to support backing out 100K transactions in a 4 hour period during the night, we could meet a requirement of 25K transactions downloaded in an 8 hour period with the current throughput requirements. It was further suggested that we should perhaps explore a faster way of backing out – perhaps a new message over the interface that could reverse what was done. NeuStar will provide a writeup for the July 2007 APT agenda.

- The APT discussed a possible message at the end of the modifies to commit the changes if all is good. That could possibly address the need to reserve 4 hours in the 8-hour period for potential backout and allow the entire 8 hours to perform the 100K modifies. But, this would not allow call testing since the SCPs wouldn't be updated until the commit message is sent.
- If there is no benefit to a single backout message approach that would identify modified SVs that were tagged, then we will have to focus on throughput needs to meet the desired timeframe. APT Participants are to determine if there is a benefit to a single backout message approach that would identify modified SVs that were tagged. Backward compatibility and the possibility that not all providers would necessarily implement such an approach should be considered as well.
- It was stated that it took 18 months to do 20 million CNAM DPC modifies as a result of previous merger activity.
- A local system vendor suggested a possible data model that associates DPC data with an LRN and broadcasting that as network data as opposed to at the TN level. It was then stated that there are cases where resold numbers are associated with the same LRN as other numbers in the network provider's switch but are associated with a different CNAM or LIDB database. It was suggested that these could possibly be treated as exception cases like we do with ported numbers in pooled blocks, and if the DPC data is different in the individual SV than at the LRN level, then the individual SV data could take precedence.
- Another suggestion was to augment the existing range message to enable a list of TNs, not necessarily contiguous, to be modified.
- NeuStar is to coordinate among industry participants and provide a descriptive writeup for the September 2007 APT meeting on the following proposed alternatives:
  1. a single backout message approach that would identify modified SVs that were tagged. Backward compatibility and the possibility that not all

providers would necessarily implement such an approach should be considered as well.

2. a data model that associates DPC data with an LRN and broadcasting that as network data as opposed to at the TN level.
3. augmentation of the existing range message to enable a list of TNs, not necessarily contiguous, to be modified.

- Action Item 0507-15 is closed.

Review of NANC 408 (Action Item 0507-18) (All):



NANC 408.doc

**Action Item 0507-18: LNPA Working Group Participants are to review NANC 408 for discussion at the July 2007 APT meeting.**

- Modifying a NAME binding attribute over the interface violates the CMIP standard. That is one of the reasons originally cited why we did not want to modify SPID over the interface. It was stated that there is some support for eliminating SMURF files. Most SPID migrations do not result in modifications of SVs or pooled blocks, just code ownership changes in network data.
- Another approach suggested could be to perform the migration over the interface if there are no SVs involved and use the existing SMURF file process if SVs are impacted. **NeuStar** will provide a writeup for the September 2007 APT meeting of performing the migration over the interface if there are no SVs involved, and use of the existing SMURF file process if SVs are impacted.
- Action Item 0507-18 is closed.

Action Item Review/Topics/Agenda for Discussion at Next Meeting:

Next APT agenda for September 2007 meeting:

- NANC 372 Review
- NANC 397 Review
- NANC 419 Review
- NANC 408 Review

***Next LNPA WG Conference Call ... August 7, 2007, 1pm – 4pm Eastern,  
888-412-7808, PIN 23272#***

***Next LNPA WG Meeting ... September 11-13, 2007, Franklin, Tennessee – Hosted by  
Verizon Wireless***