

FEBRUARY 22, 2008

## *FCC Seeks Comment on Local Number Portability Requirements for Common Carriers and Providers of Interconnected VoIP Services*

**WC DOCKET NOS. 07-243, 07-244**

**COMMENTS DUE MARCH 24, 2008  
REPLY COMMENTS DUE APRIL 21, 2008**

On November 8, 2007, the Federal Communications Commission released a Notice of Proposed Rulemaking (“NPRM”) seeking comment on whether the Commission should extend local number portability (“LNP”) requirements and other numbering-related rules to interconnected Voice over Internet Protocol (“VoIP”) providers. The NPRM also asks whether the Commission should adopt rules specifying the length of porting intervals and other details of the porting process.

On February 21, 2008, the NPRM was published in the Federal Register, and thus comments are due on March 24, 2008, and reply comments are due on April 21, 2008.

The issues raised in the NPRM impact all common carriers and providers of interconnected VoIP services.

### **INTERCONNECTED VoIP PROVIDER NUMBERING OBLIGATIONS**

Among other issues, the NPRM seeks comment on:

- Issues associated with the implementation of LNP for users of interconnected VoIP services;
- Whether any of the Commission’s numbering requirements, in addition to LNP, should be extended to providers of interconnected VoIP services; and
- The benefits and burdens of requiring interconnected VoIP providers to comply with N11 code assignments or other numbering requirements.

### **LNP PROCESS REQUIREMENTS**

Among other issues, the NPRM seeks comment on:

- Whether the Commission should take steps to mandate or modify certain elements of the porting process to ensure the efficiency and effectiveness of LNP for consumers;
- How the information required for validation fields adopted by the Commission affects the validation process, including any other ways that those validation fields could minimize the error rates or further reduce the amount of information that a porting-in entity must request from the porting-out entity prior to submitting the simple port request;
- Any other considerations that the Commission should evaluate in the simple port validation process; and
- Whether the Commission should adopt a requirement that carriers identify all errors possible in a given Local Service Request (“LSR”) and describe the basis for rejection when rejecting a port request.

### **PORTING INTERVALS AND PROCESS**

Among other issues, the NPRM seeks comment on:

- The Commission’s tentative conclusion that it should adopt rules reducing the porting interval for simple port requests;
- Whether the Commission should establish time limits on the porting process for all types of simple port requests (*i.e.*, wireline-to-wireline

ports, wireless-to-wireless ports, and intermodal ports) or just certain types of ports;

- Whether the Commission should adopt a rule codifying the wireless industry voluntary standard of 2 ½ hours for wireless-to-wireless ports;
- The Commission's tentative conclusion to adopt a 48-hour porting interval for wireline-to-wireline and intermodal simple ports; and
- Whether the Commission should adopt different porting intervals for particular types of simple ports (*e.g.*, wireline-to-wireline, wireline-to-wireless, wireless-to-wireline) and how the Commission should define the various porting interval timelines in terms of operating hours.

#### FOR MORE INFORMATION

For more information about the issues raised in the NPRM or if you would like to submit comments in the proceeding, please contact your regular Kelley Drye Telecommunications attorney or:

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