

October X, 2002

William Maher
Chief, Wireline Competition Bureau
Federal Communications Commission
Portals II
445 12th Street, S.W.
Washington, D.C. 20554

Re: DA01-1210, Petition of the Connecticut Department of Public Utility Control for Authority to conduct a Voluntary Unassigned Number Porting Trial and Docket No. 01-05-18, DPUC Intent to Conduct a Voluntary Unassigned Number Porting (UNP) Trial

Dear Mr. Maher:

The Connecticut Department of Public Utility Control (CTDPUC or Department) acknowledges receipt of your May 14, 2001 letter on behalf of the Federal Communications Commission (FCC or Commission) authorizing the Department to conduct an Unassigned Number Porting (UNP) trial (Trial) in Connecticut. The Commission also requested that prior to the Department's implementation of the UNP trial, that CTDPUC provide the FCC with a number of reports so that it can assess the feasibility of UNP as a national numbering resource optimization strategy. In order to facilitate the Department's implementation of the Connecticut UNP trial and properly respond to the Commission, the above noted docket was initiated.

From the initiation of Docket No. 01-05-18, the CTDPUC has sought the industry's input in order to properly report to the Commission as well as maximize telecommunications service providers' participation in the Connecticut trial. Specifically, the CTDPUC solicited industry input through formal requests for written comments. The Department has also conducted several technical meetings and workshops wherein the industry's comments concerning the trial were discussed. Copies of the Department's requests for written comments and notices of technical meetings have been appended hereto as Attachment 1.

In addition, the Department has been assisted in the development of the Connecticut UNP Trial by NeuStar, Inc. (NeuStar). With the input from members of the industry participating in this proceeding, NeuStar has drafted Administration Guidelines (Guidelines) that will be relied upon by the carriers participating in the Connecticut trial. A copy of the Guidelines is appended hereto as Attachment 2.

CTDPUC intends to commence a two-phased UNP trial beginning on November 1, 2002, that will be open to all providers certified to offer telecommunications services in the state. This trial was designed by the participating service providers to allow for maximum voluntary participation and employs the use of a surrogate form of UNP during Phase I and the actual porting of individual telephone numbers between service providers during Phase II. Specifically, during Phase I, a surrogate UNP trial will be conducted for three months wherein participating carriers would request telephone numbers (TN) from the industry's pooling inventory. At the conclusion of the three-month period, the data will be reviewed by CTDPUC and the industry group in order to determine whether to conclude the trial, continue Phase I or immediately move to Phase II of the trial. During Phase II, carrier to carrier exchanges of TNs in inventory for use by the receiving carrier for growth or footprint resources would occur wherein participating service providers will request telephone numbers from each other providers' inventories that would not involve a third party administrator.

Throughout the course of the CTDPUC/Industry Group UNP Technical Meetings, Cox Connecticut Telcom, L.L.C (Cox) expressed concern that the trial must immediately enter Phase II. Cox also indicated a strong desire to start Phase II before analysis of Phase I was complete.¹ However, many members of the industry group stated that moving to Phase II was not an automatic assumption. AT&T Communications indicated that it would not participate in the trial if Cox's suggestion was accepted. Similar concerns were expressed by other industry participants. In addition, the Southern New England Telephone Company suggested that the results of Phase I be analyzed before Phase II was initiated. Therefore, in light of those concerns, CTDPUC accepted the two-phased approach to trial UNP in Connecticut. ,

Because Phase I of the trial will rely on access to pooled blocks of TNs, a third-party administrator (i.e., the National Pooling Administrator) is required. By letter dated December 21, 2001, the Department requested the Commission's approval to permit the National Pooling Administrator's (NPA) assistance with the Connecticut UNP trial. The Commission approved the Department's request in May, 2002.

It is noted that in its May 14, 2001 letter, the Commission requested the Department submit an initial report prior to the commencement of the trial in order to facilitate the Commission's assessment of the feasibility of UNP as a national numbering resource optimization strategy. The following is the Department's responses to the Commission's requests:

- 1. Describe the purposes for which UNP will be permissible (e.g., specific customer requests for a particular number(s); establishing carrier footprints with small quantities of numbers; inventory building; inventory**

¹ On two separate occasions, Cox also requested that the CTDPUC direct the industry to implement an UNP trial immediately, to run concurrently with Phase I of the Connecticut UNP trial, or in the alternative, direct the industry to develop guidelines for a UNP trial by year-end 2002, for implementation 30 days after completion of those guidelines. On October X, 2002, CTDPUC responded to Cox. A copy of that response is appended here to as Attachment 3.

reduction), and what a carrier must demonstrate in each instance (e.g., proof of a customer contract).

Service Provider (SP) requests for TNs may be for footprint or growth. The same federal utilization, months-to-exhaust, and other criteria that currently apply for block or NXX requests will apply for requests for TNs in the Trial. If a SP requests numbers under the Trial, but does not meet the above noted criteria, it may submit a request to the Department for a waiver.

- 2. Describe how UNP will be administered (e.g., through a central administrator, through carrier-to-carrier administration). If carrier-to-carrier, what “rules” will apply (e.g., to prevent inadvertent ports or ports made in error)?**

The UNP trial will be administered through a central administrator pursuant to the guidelines at Attachment 2, pp. 6-8.

- 3. Specify the procedures to be followed by all parties (e.g., porting carrier, ported-to carrier, administrator, if applicable) involved in the transaction (e.g., who initiates the request for a port; who verifies that the requested port is permissible and meets the qualifying criteria).**

Requesting SPs will follow the same procedures that they normally would follow when requesting blocks (1K or 10K) of telephone numbers. Specifically, requesting SPs will be responsible to complete all appropriate forms (including identifying the appropriate Operating Company Number [OCN], parent company OCN, Administrative Operating Company Number [AOCN], switch ID and Tens-Block effective date, etc.). The Administrator will be responsible to receive all requests for tens-block unassigned numbers from the SPs and validate the requests to ensure each applicant meets the criteria to request tens-block numbers; verify that the applicant has completed the appropriate forms containing the pertinent information; assist industry inventory pool participants, as necessary, with the completion of all Tens-Block forms; select the specific unassigned numbers for assignment, or provide the reason to the SP why the assignment cannot be made; and respond to the applicant's request(s) within 7 calendar days following receipt of the request.

- 4. Will audits be performed to ensure compliance with established procedures? If yes, what type of audits will be conducted (e.g., random audits) and who will conduct such audits?**

In the performance of its duties and in meeting its responsibilities, the Administrator may encounter situations that may alert them to a possible noncompliance with the industry guidelines which warrants the need for an audit. In these situations, the Administrator will inform and forward relevant information, which contains the details of the possible infraction to the designated auditor or appropriate regulatory agency for disposition. The Administrator may also be

required to provide SP specific data to an auditor in order to facilitate the audit process.

SPs requesting resources from the industry pool shall be subject to audits to assure compliance with the Guidelines and Trial processes and principles. Audits will be conducted by a designated neutral party to:

- a. ensure uniformity in application of these guidelines by the Administrator to all unassigned number requests received by the Administrator;
- b. ensure compliance with these guidelines by SPs and the Administrator; and
- c. ensure the efficient and effective use of numbering resources by Applicants/ Holders and efficient and effective management of numbering resources by the Administrator.

5. Describe the dispute resolution procedures between carriers for inadvertent ports or ports made in error.

In cases of inadvertent ports or ports made in error, the procedures followed when TNs are inadvertently ported or numbers ported in error when numbers are ported for local number portability purposes will be followed. Carrier disputes would be addressed by the Department once they have been raised by the affected party(ies).

6. Describe any limitations on porting (within certain rate centers only or state-wide; the amount of numbers that may be ported per request; whether a carrier may deny another carrier's request for numbers under certain circumstances and a description of those circumstances).

The Trial will be conducted in all areas of Connecticut where pooling has been implemented except for the Woodbury Telephone Company service territory. One pooled block will be used in the Trial for each rate area. Only Requests for TNs will be in quantities of 10, but no limit on the total quantity of numbers requested except that a carrier requiring more than 500 numbers would request a pooled block assignment rather than making its requests as part of the Trial.

7. Describe which carrier(s) will cover the cost of porting, and if that coverage will differ depending on the purpose for which a port is sought. Describe any plans to permit carrier cost recovery.

Carriers will be responsible for their own costs incurred during the Trial.

8. Describe any carrier reporting requirements (e.g., will carriers donating and receiving ported numbers be required to supplement their Numbering

Resource Utilization and Forecasting (NRUF) reporting whenever a port takes place, or periodically -- e.g., either every 6 months with their scheduled NRUF report submissions or at some other interval). Will carriers be permitted to aggregate and report ported numbers at the rate center level or at the NPA level, and will the reporting level depend on the quantity of numbers being reported?

NRUF report submissions would be submitted by the Pooling Administrator in the same manner as contaminated blocks are reported today.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

cc: Service List