



Federal Communications Commission
Washington, D.C. 20554

November 16, 2015

Honorable Betty Ann Kane
Chairman
Public Service Commission of the District of Columbia
1333 H Street, N.W.
West Tower 7th Floor
Washington, DC 20005

Re: Nationwide Wireless Number Portability

Dear Chairman Kane,

As you are aware, on September 25, 2015 the Competitive Carriers Association (CCA) and CTIA – The Wireless Association (CTIA) sent Chairman Tom Wheeler a letter regarding the availability of number portability to wireless consumers nationwide. In particular, the letter discusses the technical limitation within the existing telephone number porting system that prevents consumers—particularly customers of small wireless providers—from porting their telephone numbers to wireless providers that do not have a facilities-based presence in the telephone number's original geographic area. I understand that representatives of CCA and CTIA delivered a presentation concerning nationwide wireless number portability five days later at the September 2015 quarterly meeting of the North American Numbering Council (NANC), and that members of the NANC discussed the issue at the meeting. With this letter, I am asking the NANC to take the next logical step in bringing its expertise to bear in this matter of great importance to American consumers.

In their letter, CCA and CTIA identify near-term, interim, and longer-term practical steps to implement nationwide wireless number portability. They note, however, that a more comprehensive solution will implicate longstanding industry practices, legacy telephone network equipment, and federal and state regulations—for wireless, wireline, and VoIP providers alike. For this reason, CCA and CTIA suggest that the Commission direct the NANC to evaluate and recommend actions to enable nationwide wireless number portability through technical modifications to the location routing number system used to route wireless- and wireline-originated calls to ported numbers. In particular, they recommend that the NANC report to the Commission on a number of regulatory and consumer issues relating to nationwide wireless number portability. (See CCA/CTIA Letter at page 4.)

The Wireline Competition Bureau, in close consultation with the Wireless Telecommunications Bureau, agrees with CCA and CTIA that the experts within the NANC should evaluate these important number portability issues and report to the Commission on its evaluation and proposed solutions to nationwide wireless number portability. We therefore direct the NANC to study the regulatory and consumer issues that may arise in connection with allowing a wireless telephone

number to be associated with any Location Routing Number (LRN), and proposed solutions to each identified issue. Specifically, the NANC should address:

- Potential impacts to the life of the North American Numbering Plan;
- Numbering Resource Utilization and Forecasting form impacts;
- Applicability and assessment of tolls, tariffs, and taxes;
- The role of state regulatory commissions;
- Costs, including cost recovery;
- Conforming edits to relevant federal rules; and,
- How long the need for LRNs will continue to exist once VoIP interconnection is fully implemented, including an analysis of the role of LRNs for carriers that implement both TDM and VoIP-based interconnection during the VoIP interconnection transition.

We direct the NANC to report its findings on these issues no later than six months from today. In the interim, the NANC should report to the NANC Designated Federal Officer at 45-day intervals its progress in evaluating these issues, as well as at each NANC meeting between now and its completion of the report.

We also direct the NANC to consider the CCA and CTIA recommendation that the Alliance for Telecommunications Industry Solutions (ATIS) evaluate and recommend actions to enable nationwide wireless number portability, and to engage the ATIS and the Local Number Portability Administrator in this effort as the NANC deems appropriate. Moreover, to the extent that the report will address 911 issues associated with nationwide porting of wireless telephone numbers, we encourage the Council to consult with the National Emergency Number Association. Wireless providers may wish to pursue the near-term solution suggested by CCA and CTIA while their interim and long-term solutions are under consideration by NANC.

We note that the NANC's LNPA Working Group established a sub-team to identify the issues and impacts to being able to port telephone numbers anywhere in the United States and developed a draft White Paper for presentation to the Working Group. *See North American Numbering council, Local Number Portability Administration Working Group, White Paper on Non-Geographic Number Portability, February 19, 2015.* While we commend the LNPA Working Group sub-team for its work to date, we also encourage the NANC to continue to build on that work by specifically addressing the issues identified above, as well as others that may be appropriate to the overall goals of wireless number portability on a nationwide basis. We also commit to make available the Commission's technical experts to work with the NANC on this important consumer and competition issue.

If you have questions about the Bureau's referral, please contact Marilyn Jones, the NANC's DFO, by telephone at 418-2357, or by email at marilyn.jones@fcc.gov. In the meanwhile, thank

you for your continued commitment to seamless number portability for all American consumers, regardless of where they live.

Sincerely,

A handwritten signature in blue ink, reading "Matthew S. DelNero". The signature is fluid and cursive, with a long horizontal stroke at the end.

Matthew S. DelNero
Chief, Wireline Competition Bureau, FCC

cc: Roger C. Sherman, Chief, Wireless Telecommunications Bureau, FCC