

7-30-10

Comcast's Response to NANC - Telcordia Dispute – 4 Policy Issues

To: Chairman Kane

Comcast responses in Bold and italicized font

Section 3.4 included four specific policy issues that the FoN believed should be addressed. We note with interest that these policy issues are as valid today as they were in 2004.

3.4 Policy Issues

The FoN identified four policy issues that that need to be considered when making a determination whether NANC Change Orders 399 and 400 should be included in the NPAC. The four policy issues are as follows:

1. Resolution needed on whether services involving only IP-IP versus PSTN should be in the NPAC.
 - Rules for SPs using IP interfaces are not defined and whether the NPAC should be used for this purpose is unclear.

❖ *Comcast Response*

- *NPAC database should be used only for routing calls based on LRNs, as defined by the industry. When the Industry has a schedule to transition to an IP routing system, Number Portability technology should be reevaluated to determine the best solution.*
- *There are other options that exist to Service Providers for identifying/providing the type of information in the URI fields under Change Orders 399 and 400. (e.g. ENUM and Private sources, etc.)*
- Should the NPAC provide an additional mechanism to support IP to IP?

❖ *Comcast Response*

- *NPAC database should be used only for routing calls based on LRNs, as defined by the industry. When the Industry has a schedule to transition to an IP routing system, Number Portability technology should be reevaluated to determine the best solution.*
 - *There are other options that exist to Service Providers for identifying/providing the type of information in the URI fields under Change Orders 399 and 400. (e.g. ENUM and Private sources, etc.)*
 - It should be noted that the NPAC is a provisioning system that will help facilitate the coordination between SPs that otherwise will require multiple database checks.
2. If adding this information will impose costs upon those that do not use these features, should the entire industry be forced to pay (will they pay?) for it?

- The NPAC has in the past had quite a few modifications added that have provided a benefit to a select group of SPs.
- Cost may be a secondary issue and discussion may be premature if the business case that surrounds it has yet to be developed. Since the change orders will be installed in an inactive state, there is no cost until they are turned on.

❖ **Comcast Response**

- ***Comcast's understanding is that inclusion of URIs or additional TNs in the NPAC will not increase transactional costs to the industry.***

3. The two change orders will be separated for policy considerations and analysis.

- Change Order 399 does not appear to have the same impacts and issues as Change Order 400.
- It was noted that the LNPA considered both change orders relative to being added in a turned off state or as fully operational as part of NPAC Release 3.3 implementation.
- The purpose of the NPAC is to avoid limiting an end-user's ability to port. For example, a carrier stated that it is able to port numbers without impacting services today without needing the NPAC change orders.

❖ **Comcast Response**

- ***No type of carrier is impeded from Porting a TN today based on information that is or is not in the NPAC.***

4. Do these change orders make sense relative to the long-term needs of the industry?

- It was stated that the FoN may not have the right technical representation to consider long term technical requirements.

❖ **Comcast Response**

- ***Technical Requirements should be supported in the LNPA-WG and not the FoN.***
- ***LNPA-WG Web Site specifically states their role is as follows:***
 - ***The LNPA WG is responsible for developing and maintaining the process that is followed by all Service Providers who participate in LNP.***
 - ***The LNPA WG is also responsible for defining the requirements for the national Number Portability Administration Center (NPAC) Service Management System (SMS) and how it interfaces to each Service Provider's local LNP system to enable LNP.***
- ***FoN's Mission = To explore changes in the environment, including new and future technologies, the impact of the market place and/or regulatory changes and innovations on telephone numbering.***
- ***FoN's Scope = Investigate new telephone numbering assignment approaches and future telephone number assignment requirements... etc.***

- The FCC's recognition of existing needs for portability when the NPAC was created limits addressing future needs.