



**Public Service Commission of the District of Columbia**  
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[www.dcpsc.org](http://www.dcpsc.org)

**Betty Ann Kane**  
**Chairman**

October 13, 2015

Mr. Matthew DelNero  
Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

RE: NANC Local Number Portability Administration Working Group  
Recommended Clarification to LNP Best Practice 0004

Dear Mr. DelNero:

At the September 30, 2015 meeting of the North American Numbering Council (NANC), the NANC concurred with the recommendation of the Local Number Portability Administration Working Group (LNPA WG) to clarify the meaning of the term “donor carrier”, as it appears on Page 11 of the “LNPA WG Interpretation of N-1 Carrier Architecture” (in the third bullet; a/k/a LNP Best Practice 0004 V.5, Attached). The LNPA WG confirms that the donor carrier in this scenario is the A-Block Code Holder designated in the LERG for the NPA-NXX of the called number. The A-Block holder is the default carrier for routing calls based on the NPA-NXX of the called number. In the instance where a TN is ported out of a pooled thousands block, the thousands block holder is not the A-Block Code Holder, nor the donor carrier in the context of these EAS N-1 responsibilities. The call is default routed to the actual A-Block Code Holder, who is responsible for performing the LNP dip. The NANC requests that this clarification to LNP Best Practice 0004 be adopted by the Federal Communications Commission Wireline Competition Bureau.

Parenthetically, I bring to your attention that LNP Best Practice 4 V.5 was the result of a request in 2004 by then NANC Chair Robert Atkinson for the LNPA WG to address in part, the various Extended Area Service (EAS) call routing situations and recommend the parties who would perform the LNP dips necessary to insure proper call routing. Page 11 of the “LNPA WG Interpretation of N-1 Carrier Architecture” is where these EAS-related

Mathew DelNero  
Wireline Competition Bureau  
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call scenarios are explained. As shown in the January 19, 2005 NANC meeting Minutes, this LNPA WG document was reviewed with the full NANC. These meeting Minutes also document that Page 11 would be submitted by NANC Chair Atkinson to the FCC's WCB for further action. NANC Chair Atkinson sent a letter to the WCB on July 25, 2005 (Attached) wherein he recommended that "on the NANC's behalf, that the Commission endorse all of the LNPA WG's recommendations (particularly the EAS proposals) and, as quickly as possible, take any other steps that may be necessary to encourage service providers to abide by them." Unfortunately, the FCC WCB has not acted on this NANC recommendation. Accordingly, I request that in association with the aforementioned recommendation regarding the clarification to LNP Best Practice 0004 that the FCC WCB also endorse the underlying LNP Best Practice 0004 V.5.

Please feel free to contact me, or the LNPA Working Group, Tri-Chairs: Paula Jordan Campagnoli, ([Paula.Campagnoli@T-Mobile.com](mailto:Paula.Campagnoli@T-Mobile.com)), Ron Steen, ([rs7566@att.com](mailto:rs7566@att.com)), or Dawn Lawrence ([dawn.r.lawrence@xo.com](mailto:dawn.r.lawrence@xo.com)) if you or members of your staff have any questions regarding this NANC submittal.

Sincerely,



Betty Ann Kane  
Chairman  
North American Numbering Council

Attachments (2)

cc: Kris Monteith, FCC  
Ann Stevens, FCC  
Marilyn Jones, FCC  
NANC Members