

# Future of Numbering Working Group

## Interim Report to the NANC

### Nationwide Number Portability

February 8, 2016

On November 16, 2015 the FCC sent a letter regarding nationwide wireless number portability to the NANC Chair which directed 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 the proposed solutions to each identified issue”. The FCC outlined seven specific issues to be addressed, and the NANC Chair referred the following of those issues to the Future of Numbering Working Group (FoN WG):

- Applicability and assessment of tolls, tariffs, and taxes;
- The role of state regulatory commissions;
- Costs, including cost recovery;
- Confirming edits to relevant federal rules

This interim report is intended to address each of these issues and provide an update of the FoN WG discussions to date.

#### **Defining Nationwide Number Portability**

The LNPA WG defined Non-Geographic Number Portability (NGNP) as the “ability of users of telecommunications services to keep their assigned telephone numbers when relocating within the United States, regardless of the Rate Center associated with the phone number’s origin, or the distance between the associated Rate Center and the end user’s physical location.”<sup>1</sup>

There have been several other terms used across the industry, to identify a porting scheme where telephone numbers are no longer associated with a physical location or Rate Center, such as Location Portability, Nationwide Wireless Number Portability, and Non-Geographic Number Portability. The FoN WG will work with the other NANC working groups to reach consensus on a defined uniform term to best describe nationwide number portability (NNP).

#### **Assumptions**

As the FoN WG started discussions, it became apparent that some assumptions needed to be defined. The following assumptions were agreed to by the FoN WG:

- 1) Assume when the consumer engages in NNP they physically move and their interconnect point is established in their new geography.
- 2) Assume that the consumer is now under the new district (porting to a different rate center or LATA within the same state) or new state laws/regulations.

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<sup>1</sup> North American Number Council Local Number Portability Administration Working Group White paper on Non-Geographic Number Portability February 19, 2015

- 3) Assume that NNP should be implemented up to and including crossing state lines (e.g. porting a number assigned in CA to NY).

The above assumptions will continue to be monitored, and the FoN WG will modify them as necessary going forward. These assumptions will be shared with other NANC working groups to ensure that all working groups are in agreement.

### **Applicability and assessment of tolls, tariffs, and taxes**

A sub-committee was formed to discuss and define this issue.

### **The role of state regulatory commissions**

Several states' commission staff regularly attend the FoN WG meetings. Early in the discussions it was clear that each state has its own regulations and processes to manage portability within the state. The regulations and processes could vary differently from state to state.

The FoN WG received input from the state commission staff participants and identified some aspects of NNP at the state and local levels. Some of the concerns expressed were:

- **Consumer Complaints**

Some carriers do not provide service throughout the United States, therefore there is a concern surrounding NNP and consumer complaint resolution. Specifically, in an NNP port scenario, which state would adjudicate a consumer's complaint should a portability problem arise? At the core of this concern is a jurisdictional question, as to whether NNP is local or interstate, which will need to be resolved.
- **Coordination among states for rules and common practices for NNP**

Each state creates its rules based on formal proceedings. Any state rules that conflict with a federal rule will have to be changed. This concern will need close scrutiny at the Federal Communication Commission to ensure there is clarity for States, industry and consumers.

With NNP there may be a need for nationwide 10-digit dialing, which will require States/Federal/Industry collaboration to educate and implement.
- **Public Safety**

It is crucial that all 911/NG911 and PSAPs can coordinate/collaborate their expertise to provide seamless emergency services for the public. Since many states do not have the authority to perform these tasks 911/NG911 becomes another issue that will need to be vetted at the local State and Federal levels.
- **Tariffs and Rulemaking**

Each state has its own specific methodology for rule making and tariffing. With NNP these processes may require some changes to accommodate an interstate program and rules.

The FoN WG continues to discuss this in more detail.

**Costs, including cost recovery**

The FoN WG has reached out to the LNPA WG for assistance with defining the costs implied by NNP. The subcommittees will collaborate to reduce duplicate efforts.

In addition, the FoN WG agreed that without a technical solution for NNP defined and agreed to by the industry, it is a challenge to define issues and resolutions. The FoN WG tri-chairs reached out to ATIS and the ATIS Packet Technologies and Systems Committee (PTSC) co-chairs to ask for assistance regarding a feasible technical solution(s) to NNP. The PTSC agreed to start working on analyzing different possible solutions for NNP and create a final recommendation. It is unclear if a final recommendation will be defined and agreed upon before the NANC must submit its final report to the FCC in May of 2016.

The FoN WG will continue its collaborations with ATIS' PTSC to understand potential technical solutions.

**Conforming edits to relevant federal rules**

The FoN WG has determined that all local/State rules may be dependent upon federal rule changes, so the FoN WG will keep this issue open and continue to look for possible changes to the rules.

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