

February 2, 2010

MEMORANDUM TO CLIENTS

Re: FCC Announces Deadlines for Comments on Simple Number Porting Proposals

Comments Due: February 16, 2010

Reply Comments Due: February 22, 2010

The FCC has announced comment deadlines on two proposals submitted to the Commission regarding what data fields are necessary in order to complete “simple” ports of a customer’s telephone number from one carrier to another in response to a valid port request. Due to recent changes to the FCC’s local number portability rules that enable consumers to keep their telephone number when switching service providers, wireless, wireline and interconnected voice over Internet protocol (“VoIP”) providers will soon be required to complete “simple” ports (ports that generally do not involve more than one line or more complex adjustments to telephone switching equipment) in one business day rather than the current four-day porting period.

The FCC received two separate proposals regarding the information fields necessary to complete simple ports in the abbreviated timeframe. The North American Numbering Council recommended the use of 14 information fields in connection with such ports, while the National Cable & Telecommunications Association, Cox Communications and Comcast Corporation submitted an alternative proposal recommending the use of eight information fields for such requests. Generally, entities subject to the local number portability requirements may not request information beyond what is required to validate and complete a port request. Thus, commenters should focus on the minimum amount of information needed to complete a port in considering what number of fields is appropriate.

Comments are requested by **February 16** and reply comments by **February 22, 2010**.

We would be pleased to respond to any questions regarding this matter.

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