

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)

Nationwide Number Portability Numbering)

Policies for Modern Communications)

WC Docket No. 17-244

WC Docket No. 13-97

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net Coalition (“VON”)¹ respectfully submits these comments in response to the Commission’s Notice of Proposed Rulemaking and Notice of Inquiry (“Notice”)² regarding nationwide number portability (“NNP”). The Notice seeks comment on issues associated with removing legacy regulations and different models that might assist to implement NNP.³

VON has long-supported the Commission’s proposals for local number portability (“LNP”),⁴ which in part has resulted in the dynamic growth of interconnected VoIP, and now applauds the Commission’s move toward a more comprehensive and flexible NNP plan. An efficient NNP plan will reduce costs, encourage competition among voice service providers,⁵ and slow number exhaustion. In 2017, geography⁶ or transitioning between wireline and wireless services⁷ should no longer be obstacles to keeping one’s personal or business phone number.

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP-enabled communications. VON Coalition members are developing and delivering voice and other communications applications used over the Internet. For more information, see www.von.org.

² *In re Nationwide Number Portability Numbering Policies for Modern Communications*, Notice of Proposed Rulemaking and Notice of Inquiry, Docket Nos. 17-244, 13-97 (rel. Oct. 24, 2017).

³ *Notice* at 13.

⁴ *See, e.g. In re Telephone Number Requirements for IP-Enabled Services Providers; Local Number Portability Porting Interval and Validation Requirements*, VON Coalition Comments, WC Docket No. 07-243 (filed March 24, 2008); VON Coalition Reply Comments, WC Docket No. 07-243, 07-244 (filed April 21, 2008).

⁵ *Notice* at 7.

⁶ *Notice* at 4.

⁷ *Notice* at 13.

Further, removing existing inefficiencies in the current procedure,⁸ such as the N-1 requirement⁹ and archaic interexchange dialing parity requirements,¹⁰ is simply good policy.

I. Nationwide number portability benefits consumers and competition.

VON supports the Commission’s goal of bringing the benefits of number portability to all. Those who wish to move to and from areas with rural or regional carriers, or simply to migrate from PSTN to interconnected VoIP services, should have the option to make those choices without risk of losing a telephone number.¹¹ Like LNP before it, moving toward NNP will help “fulfill the [Communications] Act’s goal of facilitating a ‘rapid, efficient, Nationwide ... communication service.’”¹² A modern national numbering plan will present Americans with real options for number portability, including national carriers, local and rural carriers, and VoIP providers.

A more efficient porting and numbering plan will also enhance competition by “[e]nsuring that telephone numbers do not act as barriers to competition between carriers of various sizes and technologies”¹³ Despite attempts to provide an even playing field for interconnected VoIP providers,¹⁴ the current rate center-focused system limits the ability to port to and from certain LECs. The widespread adoption of VoIP and other forms of over the top communications further reflects the need for a porting plan available to consumers of all types and for carriers of all sizes and locations. The Commission’s proposal is an important step to promote a more robust and competitive market for consumers.

⁸ Notice at 6.

⁹ *Id.*

¹⁰ Notice at 7.

¹¹ Notice at 2.

¹² *In the Matter of Tel. No. Requirements for IP-Enabled Services Providers Loc. No. Portability Porting Interval and Validation Requirements IP-Enabled Services Tel. No. Portability Final Reg. Flexibility Analysis Numbering Resource Optimization*, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd 19531, 19540 (2007) (“Telephone Number Requirements”) (citing 47 U.S.C. § 151).

¹³ Notice at 3.

¹⁴ *See, e.g. Telephone Number Portability*, Second Report and Order, 12 FCC Rcd 12281, 12283 (1997) (“Second Number Portability Order”).

Finally, untying consumers from their original rate centers will improve stability by slowing number exhaust. Widespread provision of LNP has helped, and now the promise of a real nationwide porting plan will continue to slow number exhaust.¹⁵

II. Certain Legacy Regulations Are No Longer Necessary.

VON has long supported “[s]wift and efficient number portability.”¹⁶ At its inception, the N-1 requirement was a sensible and efficient approach to call routing in light of the competitive landscape.¹⁷ Now, however, handing off a call just because it looks like it is interLATA is no longer an efficient practice. The nature of a true NNP environment, particularly in an era of widespread LNP, makes it prudent for an originating carrier to query a number itself if it is able.

The competitive benefits of removing the interexchange dialing parity requirement are twofold. First, the FCC’s plan recognizes that today’s market is radically different from what consumers faced in 1982.¹⁸ The advent and explosive growth of broadband and interconnected VoIP services,¹⁹ along with other all-service carriers, means that consumers have more choices than ever before. As a result, consumers are no longer at the whim of a small number of incumbent LECs to provide access to long distance carriers.²⁰

¹⁵ Notice at 16. See also *Telephone Number Requirements* at 19542.

¹⁶ See VON Coalition Reply Comments, WC Docket No. 07-243, 07-244, at 2.

¹⁷ Notice at 9.

¹⁸ Notice at 10 (citing *See Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Enforcement of Obsolete ILEC Legacy Regulations That Inhibit Deployment of Next-Generation Networks et al.*, Memorandum Opinion and Order, 31 FCC Rcd 6157, 6183-84 (2015) (“2015 USTelecom Forbearance Order”).

¹⁹ Notice at 10.

²⁰ Notice at 7.

CONCLUSION

The Von Coalition encourages the FCC to move toward complete nationwide number portability and to remove antiquated regulations that no longer reflect today's marketplace. For these reasons, the Commission should adopt the proposals in the NPRM/NOI.

Respectfully submitted,

VOICE ON THE NET COALITION

/s/ Glenn S. Richards _____

Glenn S. Richards
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street, NW
Washington D.C. 20036
(202) 663-8215
glenn.richards@pillsburylaw.com

Its Attorney

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