

## **FCC MANDATE**

### **NON-COMPLIANCE INTERACTION AID**

**Context:** LNPA WG not given authority to enforce compliance. LNPA WG not a regulatory body. LNPA WG is a technical body.

**Goal:** To develop a communications process/checklist to assist service providers when dealing with trading partners who are not complying with FCC porting Orders.

#### **Preliminary/Pro-Active Checklist:**

- Exchange business rules/forms as necessary
- Maintain copies of current LNP business rules for all porting partners when available
- Contact info for the trading partner in question
  - Identify the person you need to speak with at the Trading Partner
    - \* Your internal customer database
    - \* NPAC secure site (will show if a service bureau is involved and that may also be a good first contact)
    - \* LNPA-WG contact list
    - \* LERG contact (AOCN or OCN contacts)
    - \* FCC site has a list of company attorney (Info on Telecom Providers gives 499-A form contact) <http://apps.fcc.gov/cgb/form499/499a.cfm> or [www.fcc.gov/wcb/iatd/locator.html](http://www.fcc.gov/wcb/iatd/locator.html) This FCC list shows company and attorney contacts.
    - \* NGIIF contact list for LNP (ATIS knows this isn't very updated or complete)
    - \* Website for LNP Business rules
    - \* Escalation hierarchy (if available)
- If an ICA is in place, it may give contacts and path for issues to be raised. May also indicate LNP compliance based of FCC orders and/or industry standards and guidelines. Wireline company's (some ICA's have varying rules and so need to check terms)
- Trading Partner Profile (TPP) may also have contact information. Some providers have in place the TPP on both wireline and wireless sides.

#### **Event/Escalation Checklist:**

- Investigate situation

- Verify the porting out NXX is open for LNP in the LERG and NPAC systems. May have to issue a BFR to request the code be opened when a company has a TN to port.
- Identify Trading Partner to Trading Partner level of contact/escalation necessary
- Determine magnitude of non-compliance. Is it happening on every port or under certain circumstances? Is it chronic or not?
- Cite specific examples/detail. Always helpful to have the facts listed in chronological order, in order to make that contact.
  - TN
  - PON
  - Date/time of LSR and JEP, Rejects
  - Relevant facts (service impacting or not, etc)
  - Actions taken so far
  - NPAC messages time stamps, if applicable
  - Who at the Trading partner has been involved so far
- Phone call or email for initial contact from provider who views an issue, explain the example, give details.
  - State FCC Orders applicable and appropriate mandated LNP Process Flows
  - State industry LNPA WG stance on an issue or embed the Best Practice url (if there is one),
- You may want to document each contact step for your internal use, and outcome in case need for higher level discussion/escalation
- After exhausting the trading partner to trading partner escalation process, contact the appropriate regulatory body for resolution. (last resort)
  - There are informal and Formal FCC Complaint processes. (Most of these come direct from the end user)
  - Some escalation may be worked through the State PUC's
  - Suggested path is to the lowest level
  - Work the company hierarchy to escalate to an equivalent counterpart

**General:**

Have your own ducks in a row before contacting the other party!