LNP Problem/Issue Identification and Description Form

**Submittal Date** (mm/dd/yyyy): 7/14/2009 **PIM 72 v2**

**Company(s) Submitting Issue**:\_\_\_\_Qwest\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Contact(s): Name** \_\_\_\_Jan Doell\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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**(NOTE: Submitting Company(s) is to complete this section of the form along with Sections 1, 2 and 3.)**

1. **Problem/Issue Statement:** (Brief statement outlining the problem/issue.)

A service provider (OSP) has assigned a security code/password/pin to every one of their end users accounts and as of 6/1/09 requires that the NLSP/NNSP provide this new security code/password/pin on all CSI request’s and all LSR request’s (not just Simple Ports) to port away an end user from that OSP. Many of the end users desiring to port their numbers are unaware of their security code/password/pin, thus this requirement causes a delay in the porting process and negatively affects the end user.

1. **Problem/Issue Description:** (Provide detailed description of problem/issue.)

A. Examples & Impacts of Problem/Issue: This new requirement is causing significant delays in the ability of end users to port away from that provider because the end users did not ask for the security code/password/pin to be put on their accounts and in many case do not know what the security code/password/pin is. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Frequency of Occurrence: \_\_constant\_ Consistently done on a routine basis\_\_\_yes\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
2. NPAC Regions Impacted:

Canada\_\_\_ Mid Atlantic \_\_\_ Midwest\_\_\_ Northeast\_\_\_ Southeast\_\_\_ Southwest\_\_\_ Western\_\_

West Coast\_\_\_ ALL\_X\_

D. Rationale why existing process is deficient:

This provider has represented that they are using the FCC Simple Port validation statement in FCC 07-188 as their support, however this use is out of context and mandates the 4 validation fields be on all ports even though the FCC Order was done to simplify the porting process to ‘validate on no more than 4 fields for a Simple Port. This is causing significant delay in the ability of the end user to port their numbers. This provider indicates the provider assigned security code/password/pin protects their users CPNI, however the New Service Provider has an LOA from the end user that allows for them to perform the porting function, thus eliminating this CPNI concern.

E. Identify action taken in other committees / forums:

In process of working directly with this provider and with a state PSC, via an informal complaint requesting relief.

F. Any other descriptive items:

1. **Suggested Resolution:**

For the LNPA-WG to make a Best Practice and statement that this specific practice is not acceptable and actually goes against the FCC order, causing an increase in the delay and complexity of porting for end users who want to change providers. And for the LNPA-WG to then forward the Best Practice to the NANC for endorsement due to the negative impact on the end user.

1. **Final Resolution:**

This PIM resulted in the creation of Best Practice 060 – Impact to the porting process of SP-assigned pass codes/PINs to End User accounts

**LNPA WG:** (only) Final Resolution Date: 9/16/09

Item Number: PIM 72 v2 Related Documents: BP 060

Issue Resolution Referred to: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Why Issue Referred: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_