LNP Problem/Issue Identification and Description Form

**Submittal Date** (mm/dd/yyyy): 13 January 2010 **PIM 74v4**

**Company(s) Submitting Issue**: Syniverse Technologies

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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.)

**Regarding the definition of the word “sends” in the LNP Provisioning Flows Narratives in the context of a response.**

The provisioning flows narratives currently state: *“ONSP* **sends** *FOC confirming Simple Port request to NNSP.” (emphasis added).* In addition, FCC 03-284 Footnote 129 states: “*…Firm Order Confirmation refers to the response the old service provider* **sends** *to the new service provider upon receiving the new service provider’s request to port a number…*” (emphasis added). Some providers with their own GUIs for LSR submission only place or post their Local Responses (e.g., FOCs, Rejects) on their GUI website for retrieval by the New Service Provider rather than sending it (e.g. transmitting it via fax or e-mail or some other method). This places a burden on the new service provider to check if the response is posted. Providers have questioned if posting the Response (FOC or Reject) is consistent with “sends”.

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

**A. Examples & Impacts of Problem/Issue:**

Carriers that place their local responses in a web site require the NNSP to take extra efforts to return to the web site to check if the local response is there yet. If it is not there they need to check back later. This may require extra care on the part of the NNSP to note that it needs to follow up. If the response is not yet ready the NNSP has to make another note to follow up. Each effort costs the NNSP additional time and expense. In a one-day porting scenario it is reasonable to expect that more carriers will have trouble making the four hour response deadline requiring more manual efforts.

In particular, since a LSR submitted by 1 pm (in the predominant time zone of the NPAC region of the porting phone number) will be responded to by 5 pm (if the response is compliant) that gives only 1 hour for the new service provider to look for the response, interpret it, complete any activity required before sending the port to the NPAC via the New Service Provider Create message to start the medium timers that are now set at 3 hours each. If the NNSP does not start the NPAC medium timers by 6:00 pm and the ONSP does not do a matching ONSP create, then these timers will not complete by midnight and the port will not take place as scheduled.

In some cases, a few carriers have posted a second response *after* the initial response posted in a GUI. However, because the NNSP has already found one response they have no reason to look again. When this happens it causes major confusion. For example a request was made via a GUI and a reject response was posted. The ONSP then later posted a FOC – without a subsequent LSR. When the NNSP called to work the fallout of the previous LSR the ONSP told the NNSP the LSR was confirmed, but the NNSP only had the Reject. This caused a lot of confusion and delay of the eventual port. What’s worse, it’s possible – and has happened – where a the second response was a Reject or Jeopardy. When the NNSP goes to port it fails at the NPAC and the port does not take place as expected.

**B. Frequency of Occurrence:**

Some carriers’ GUIs do not “send” the response. For these carriers GUI system every port requires manual monitoring for a response, by the NNSP.

Syniverse has compiled a list of wireline carriers that in Syniverse’s experience, use a GUI for port outs. The responses can either be posted in the GUI, e-mailed to the NNSP (Syniverse in this case) or mixed depending on SPID, state or other conditions. 13 of the 26 (50%) GUI-using wireline carriers post their response. These 13 carriers represent 51 of the 89 SPIDs (57%) that use a GUI



Note: Since the original PIM was submitted several other carriers have introduced GUIs.

1. **NPAC Regions Impacted:**

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

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

**D. Rationale why existing process is deficient:**

* Not sending a response could contribute to delays in completing ports which may lead to consumer complaints.
* Not sending a response requires the NNSP to look for a response. If the response is not there the NNSP must continually re-access the system until a response is there, thus wasting resources.
* Sending a response when it is ready gives the maximum time to the NNSP to complete its work before sending a NNSP SV Create to the NPAC. This effectively forces NNSPs to choose between two bad options. They must either (1) potentially waste time and money proactively looking for a response that is not yet posted or (2) wait for the entire four hours to elapse before looking and then having a reduced amount of time to complete their other provisioning work before NPAC work begins.
* When 1 Day Porting (FCC 09-41) goes into effect, both NNSP and ONSP carriers will have only a few hours to complete their respective work, instead of 24 hours or more. If an ONSP doesn’t send the response, NNSP carriers may be reluctant to promise a 1 or 2 day due date to customers removing the benefit of FCC 09-41 is intended to deliver to consumers.
* The posting of a second response without some positive notification to the NNSP causes great confusion, repetitive and unnecessary work and could delay the port and therefore negatively affect the end user.

**E. Identify action taken in other committees / forums:** None.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**F. Any other descriptive items:** None.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. **Suggested Resolution:**

LNPA Working Group should adopt the following best practice:

The word “Sends” in the porting flows means a valid response to the LSR (FOC, Reject, Jeopardy or other appropriate response) is delivered by the ONSP to the NNSP ~~in much the same way as an LSR is sent from the NSP to the OSP~~. To ‘send’ in this context does not mean to just post or transmit the response to the ONSP’s GUI as this can cause delay and confusion as the NNSP struggles to know when or if the response is available and to know if subsequent responses have been issued. This delay and confusion is especially impactful during a reduced simple port interval. By actually sending the response directly to the NNSP, it gives the NNSP an immediate and positive notice of the response.

The LNPA-WG continues to support and encourage the use of automated methods for sending LSR~~’~~s and FOC~~’~~s where possible, to reduce the amount of manual interaction necessary for all parties involved. Sending the response to the LSR (FOC, Reject, Jeopardy or other appropriate response to the NNSP) in one of the following methods, notifies the NNSP of its presence and allows for the maximum processing time possible so the port can complete on time for the end user. This best practice is *not* meant to imply that the ONSP would need to accept LSRs via a method that they do not support.

Therefore, the LNPA Working Group Best Practice is for an ONSP to do one of the following:

* If XML/EDI/API is used to send the LSR to the ONSP, then the response to the LSR (FOC, Reject, Jeopardy or other appropriate response to the NNSP) should be sent back to the NNSP via XML/EDI/API.
* If a GUI is used to submit the LSR to the ONSP, then the response to the LSR (FOC, Reject, Jeopardy or other appropriate response to the NNSP) should be sent back to either: the NNSP’s e-mail address or fax number indicated on the LSR or to a default email address for the NNSP agreed to by the NNSP and ONSP.
* A less desirable but acceptable alternative method would be for the ONSP to send a notification that a response has been produced and is now available for review in the GUI by the NNSP. This notification should be sent back to either: the NNSP’s e-mail address or fax number indicated on the LSR or to a default email address for the NNSP agreed to by the NNSP and ONSP. This email notification should clearly indicate the PON or Order number involved.
* If email is used to send the LSR to the ONSP, then the response to the LSR (FOC, Reject, Jeopardy or other appropriate response to the NNSP) should be sent to either: the NNSP’s e-mail address or fax number indicated on the LSR, or to a default email address for the NNSP agreed to by the NNSP and ONSP.
* If fax is used to deliver the LSR to the ONSP, then the response to the LSR (FOC, Reject, Jeopardy or other appropriate response to the NNSP) should be sent to either: the NNSP’s e-mail address or fax number indicated on the LSR or to a default fax number/email address for the NNSP agreed to by the NNSP and ONSP.

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1. **Final Resolution:**

This PIM resulted in the creation of BP 063 - ending of the LSR Response to the New Network Service Provider (NNSP)

**LNPA WG:** (only) Final Resolution Date: 2/9/10

Item Number: PIM 74 v4 Related Documents: BP 063

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

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