LNP Problem/Issue Identification and Description Form

**Submittal Date**: 9/28/2009 **PIM 75 v4**

**Company(s) Submitting Issue**:\_Integra Telecom\_\_

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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.)

The LNPA-WG reached consensus on a best practice related to pass code/PIN verification (Best Practice 60). The best practice states that a provider cannot use a provider assigned pass code/PIN as validation or require the pass code/PIN to obtain a CSR. The new best practice will help in preventing unnecessary delays of porting, whether the delay is intentional or not. However it may leave room for the potential of using pass code/PIN information in a manner in which the industry agrees it was not intended (to delay a port request), and, may not go far enough to resolve the issue that Qwest identified in PIM 72. Integra believes the best practice requires some additional clarity and detail, including that it applies to all ports, not only simple ports.

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

A. Examples & Impacts of Problem/Issue: The best practice focuses on preventing provider assigned pass codes and pins for purposes of verification. However, there are circumstances when a customer may assign a pass code or pin to their account, but not for the purposes of preventing unwanted changes to the account or activity on the account. For example, a provider may require a end user customer select a pin or pass code to access their account information on line (CPNI). A pass code or pin the customer selects for this use, could not be interpreted as a pin or pass code a customer may select to protect the account. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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:

As Qwest’s PIM 72 outlined, a provider represented that they are using the FCC Simple Port validation statement in FCC 07-188 as their support to assign a pin or pass code to the account, and require that information from another provider, even though the customer may not be aware their account has a pin or pass code. Best practice #60 does not spell out those cases when a pin or pass code is used for CPNI.

E. Identify action taken in other committees / forums:

The LNPA-WG adopted best practice 60.

F. Any other descriptive items:

1. **Suggested Resolution:**

Revised version 11-24-09

For the LNPA-WG to revise Best Practice #60 so it states:

It is the position of the LNPA WG that only pass codes/PINs requested and assigned by the End User for the purposes of limiting or preventing activity and changes to their account (and not, for example, a password or PIN the end user uses to access their account information on-line [Customer Proprietary Network Information (CPNI)]) may be utilized as an End User validation field on an incoming port request by the Old Network Service Provider/Old Local Service Provider.  In addition, any service provider assigned pass code/PIN may not be utilized as a requirement in order to obtain a Customer Service Record (CSR). This Best Practice applies to all ports (not just simple ports.)

The additional language is highlighted.

1. **Final Resolution:**

The LNPA-WG reached consensus on a best practice related to pass code/PIN verification (Best Practice 60). The best practice states that a provider cannot use a provider assigned pass code/PIN as validation or require the pass code/PIN to obtain a CSR.

**LNPA WG:** (only) Final Resolution Date: 01/12/2010

Item Number: PIM 075 v4 Related Documents: BP 060

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

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