



2025 M STREET, NW, SUITE 800 PH: 202.296.6650
WASHINGTON, DC 20036 FX: 202.296.7585

July 3, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commissions
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Nationwide Number Portability, WC Docket No. 17-244
Numbering Policies for Modern Communications, WC Docket No. 13-97**

Dear Ms. Dortch:

As the Commission continues to explore ways to achieve nationwide number portability, INCOMPAS commends the agency for proposing long-overdue changes to its numbering policies that will help promote competition and ready the marketplace for non-geographic number portability.¹ INCOMPAS supports Chairman Pai's draft Order that is scheduled to be voted on at the July open meeting and urges the Commission to unanimously adopt it.

Specifically, given the fundamental changes to the stand-alone long-distance market and the prevalence of all-distance service, INCOMPAS supports the Commission's proposal to forbear from the interexchange dialing parity requirements for competitive local exchange carriers. Additionally, INCOMPAS believes that the Commission's "middle course" for the N-1 requirement will give competitive providers the flexibility to eliminate routing inefficiencies inherent in this practice while preserving the standardization and uniformity that has contributed to successful number portability at the local level and with nationwide carriers. Both actions represent a necessary modernization of the regulatory regime and lay important groundwork for nationwide number portability.

According to the North American Numbering Council's recently released report on this issue, a detailed cost-benefit analysis is necessary to identify the regulatory barriers, consequences, and technical feasibility of the four nationwide number portability models

¹ See *Nationwide Number Portability et al.*, Draft Report and Order, WC Docket No. 17-244 et al., FCC-CIRC1807-05 (rel. June 21, 2018).

considered by the Commission in this proceeding.² INCOMPAS encourages the Commission to adopt solutions that are competitively neutral and that ensure that providers, particularly rural and regional carriers, do not incur prohibitive implementation costs. The association and its membership stand ready to provide the Commission with the information necessary to conduct this analysis and make a determination on the model that will ultimately allow for complete number portability.

Respectfully submitted,

/s/ Christopher L. Shipley

Christopher L. Shipley
Attorney & Policy Advisor
(202) 872-5746

cc: Jay Schwarz
Amy Bender
Jamie Susskind
Travis Litman

² See FED. COMM'N COMM'N, N. AMERICAN NUMBERING COUNCIL, REPORT ON FINDINGS RELATED TO ATIS MODELS ON NATIONWIDE NUMBER PORTABILITY 1-2 (June 2018), *available at* http://www.nanc-chair.org/docs/mtg_docs/Jun18_NANC_NNP_Report_Final.pdf.