

**THE FCC SHOULD REDUCE THE WIRELINE PORTING INTERVAL TO 2 DAYS**

**Quick and easy porting of phone numbers is essential to the development of competition for phone services.**

- The need to port numbers makes the voice market different from all other markets. There is no other service where a new provider must wait for a customer to be released by its old provider before it may begin service.
- Congress wisely recognized that competition is best served when customers can keep a phone number when they switch providers; and that rule applies to all carriers, not just incumbents.
- Competition and consumers are best served when switching phone providers is no more difficult than it is for other services.
  - For video and broadband services, there is no waiting period at all when a customer decides to switch providers.
  - For wireless voice services, carriers are able to port the number in 2½ hours.

**Opposition by giant telephone companies to a shorter porting interval is unjustified and harms consumers.**

- The current porting interval permits a phone provider up to four business days to port a number. Far from being an onerous regulation, the porting interval is best viewed as a practical response that ensures a reasonable period of time for the old provider to release a number to the new provider. In 2008, however, there is no technological justification for making a new provider wait at least four days after a customer signs up for service for the number to be released.
- Wireless carriers, including AT&T and Verizon, are able to port numbers in a matter of hours. A reasonable step forward for wireline providers would be to reduce that interval from four days to two days.
- Updating and automating back office equipment and procedures is a constant part of every business. The largest phone companies in America should not be permitted to keep the number porting process walled off from advances in technology.

**While consumers would benefit from a shorter porting interval, it is appropriate to take into account any unique challenges confronting rural phone companies.**

- All consumers, including rural consumers, benefit from quick and easy porting.
- However, the FCC should consider challenges facing very small rural carriers through delayed implementation of any new rules or adoption of a slightly longer porting interval.