



September 23, 2003

Via Electronic Mail Delivery

Mr. John B. Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

*Re: Response to Wireless Telecommunications Bureau
Information Request dated, September 9, 2003
Wireless Local Number Portability Implementation
CC Docket No. 95-116*

Dear Mr. Muleta:

Sprint Corporation, on behalf of its wireless division, Sprint Spectrum L.P., d/b/a Sprint PCS ("Sprint"), below responds to your letter dated September 9, 2003.¹ Attachments 1-7, which are contained in an Excel spreadsheet, answer the seven questions posed to Sprint regarding local number portability ("LNP") implementation efforts in the Kansas City market.

Sprint is committed to complying with the FCC's wireless LNP rule and being LNP-capable on November 24, 2003.² It is working hard to meet the November deadline. Sprint has completed network and hardware upgrades necessary to support LNP.³ In addition, Sprint's IT department has logged hundreds of thousands of man hours to make its LNP systems automated and efficient in order to meet consumer demand for fast, seamless porting. Sprint is re-tooling all of its customer touch points to allow port-

¹ See Letter from John B. Muleta, Chief, Wireless Telecommunications Bureau, to Luisa L. Lancetti, Sprint Vice President, PCS Regulatory Affairs, CC Docket No. 95-116 (Sept. 9, 2003)("Muleta Letter").

² See 47 C.F.R. § 52.31.

³ Vast majority of network and hardware upgrades were complete by 11/24/02 in support of Telephone Number Pooling.

ing at all sales channels in which Sprint performs service activation (e.g., Sprint retail, third party retail, telesales, and call-in activation channels). In addition, numerous applications have been impacted and are being re-worked to support LNP including front end (e.g., provisioning and ordering) and back end (e.g., billing) systems.

Sprint has successfully completed five months ago testing with the Number Portability Administration Center ("NPAC").⁴ Sprint has also achieved several "industry firsts" in the conduct of LNP testing with other carriers.⁵ Sprint has further scheduled over 240,000 man-hours for training employees including customer service representatives about LNP and its associated processes so they can assist persons who seek to port-in to Sprint PCS or port-out to another carrier.⁶

It is important for the Commission to realize, however, that while Sprint PCS is working toward, and expects to be, LNP ready on November 24, 2003, this does not mean that all customers will be able to port their numbers (whether to or from Sprint) on November 24, or that the process will be error-free from the beginning. Porting, by its very nature, is a bilateral transaction between competing carriers in which the "trading partners" must cooperate in order to successfully port a number. As described below, Sprint is receiving mixed cooperation from other carriers, leaving Sprint concerned at the prospects of its ability to port with many carriers on November 24. Further, mistakes invariably will be made in any project of this magnitude and Sprint expects some difficulties will be experienced at the outset. In addition, while many errors can be discovered through testing, very little LNP testing has been conducted to date. The absence of coordinated testing for wireless LNP is problematic.

You have stated the Commission "expects" there will be "a smooth and efficient process in place for consumers" when LNP is scheduled to begin in November and that LNP implementation efforts are being undertaken "as quickly as possible."⁷ As discussed below, at least three things need to occur before a smooth and efficient process will be in place. And as this discussion also makes apparent, these three things will not occur without Commission intervention. As Sprint has advised in prior Commission filings, the successful deployment of LNP requires Commission action.

A. Exchange of Porting Information. In order to successfully process a customer's port request, the two involved carriers must first exchange basic information such as contact names and reach information; operating company number ("OCN"); service provider ID ("SPID"); LSR version ID; FOC version ID; WICIS version ID; hours of operation; primary/secondary porting method; *etc.* Collectively, Sprint refers to this information as "Trading Partner Profile" or "TPP" information. Sprint has pro-

⁴ See Attachment 2.

⁵ See Attachment 4.

⁶ See Attachment 3.

⁷ See Muleta Letter at 1.

vided TPP information to the nearly 600 carriers that it sent *bona fide* requests (“BFRs”), and, in doing so, requested these carriers to share their TPP information. However, less than five of these nearly 600 carriers have submitted their TPP information to Sprint PCS.⁸ Until this basic TPP information is exchanged, it will be difficult for Sprint, or any carrier for that matter, to respond to port requests. And the TPP information is what is needed to permit porting, whether or not a separate operating agreement is negotiated and executed between the parties.⁹

The fundamental problem that Sprint has encountered in its LNP efforts is that the majority of carriers have refused to cooperate. This lack of cooperation is due, in large part we believe, to the Commission’s failure to resolve a number of porting issues that have been addressed by Sprint, CTIA, and a host of other parties in this docket. Indeed, many carriers have indicated to Sprint, in response to its BFRs, TPPs or otherwise, that they are awaiting Commission direction regarding carriers’ LNP obligations before moving forward in efforts to make wireless LNP available.

As discussed in Sprint’s previously filed *ex parte* communications in this docket, some carriers have refused even to recognize Sprint’s BFRs or have claimed the requests are inadequate – even though the requests comply with all the FCC requirements.¹⁰ Numerous other carriers have refused to discuss LNP with Sprint unless Sprint first “agrees” to additional requirements that the carrier has unilaterally imposed as a condition to permitting its customers to port to Sprint PCS. Common prerequisites include:

- A Section 252 Interconnection Agreement must be in place – even though LNP does not change existing interconnection arrangements;
- Sprint must obtain its own set of telephone numbers in the rate center – even though Sprint may not need these numbers and whether Sprint acquires its own set of numbers has nothing to do with the technical feasibility of porting current LEC customers to Sprint PCS;

⁸ Sprint notes, however, that sixteen (16) carriers have submitted a sub-set of TPP information to Sprint PCS’ clearinghouse, TSI, for use in performing testing, establishing connectivity, *etc.* Sprint further notes that TSI requires a minimum of 30 days to order and configure trading partner circuits. If Sprint is to be able to effectively port with any provider by 11/24/03, TPPs need to be completed and returned no later than 10/24/03.

⁹ Similar to its experience with TPPs, Sprint has executed LNP operating agreements with less than five wireless carriers and no wireline carriers.

¹⁰ See Sprint *Ex Parte* Letter, CC Docket No. 95-116, at 3-4 (Aug. 8, 2003).

- Sprint must directly interconnect with the carrier in the rate center – even though direct connections cannot be cost justified because of the small amounts of traffic exchanged; and
- Sprint must agree to indemnify the old service provider for any unpaid account balance or termination fee.¹¹

The Commission's existing LNP rules are clear: both wireless carriers and LECs must, within six months of a request, permit their customers to port their number to an LNP capable wireless carrier submitting a *bona fide* request.¹² In other words, a LEC or wireless carrier must provide LNP within the time frame specified in the rules – whether or not the carrier making the *bona fide* request agrees to any additional conditions preferred by the recipient carrier.

Sprint again advises the Commission of its view that full progress in LNP implementation will likely not occur until the Commission confirms that carriers (a) must timely provide upon request all relevant trading profile information, and (b) may not condition its availability of LNP based on requirements not contained in the FCC rules.¹³ Sprint encourages the Commission to make these necessary clarifications immediately.

B. Testing. The Commission has recognized the importance of testing before activating new technologies and capabilities. Indeed, with regard to LEC LNP implementation, the Commission “directed” LECs to conduct a field test (in Chicago) before making LNP more widely available, determining that a field test “will help to identify technical problems in advance of widespread deployment, thereby safeguarding the network.”¹⁴ In contrast, the Commission's wireless LNP schedule does *not* provide for time to conduct a similar field test, whether for wireless-wireless porting or LEC-wireless porting.

While the wireless LNP start date is only two months away, Sprint PCS has been unable to conduct any tests with the vast majority of the carriers (over 95 percent) that it expects will be engaged in porting. Sprint PCS has received BFRs from 14 carri-

¹¹ See, e.g., Sprint *Ex Parte* Letter, CC Docket No. 95-116 (Sept. 22, 2003); Sprint *Ex Parte* Letter, CC Docket No. 95-116 (Sept. 11, 2003); Sprint *Ex Parte* Letter, CC Docket No. 95-116 (Sept. 18, 2003); Sprint *Ex Parte* Letter, CC Docket No. 95-116 (Aug. 8, 2003).

¹² See 47 C.F.R. §§ 52.23, 52.31.

¹³ See Sprint *Ex Parte* Letter, CC Docket No. 95-116 (Aug. 8, 2003). Ideally, carrier TPP information would be stored on a single web site so all carriers can learn who to contact and how to exchange porting information in the event they receive a port request from a customer served by a carrier with which the carrier does not have any bi-lateral agreement.

¹⁴ *First LNP Order*, 11 FCC Rcd 8352, 8393094 ¶ 79 (1996). The FCC also permitted LECs to phase-in LNP on a market-by-market basis, as opposed to the nationwide flash-cut approach it adopted for wireless LNP.

ers – all wireless carriers.¹⁵ Sprint PCS has submitted BFRs to approximately 90 wireless carriers and over 500 LECs. The problem that Sprint has encountered is that most carriers have expressed no interest in testing or, more commonly, have refused even to discuss the subject unless — Sprint agrees to certain demands such as those discussed above.

Nearly all wireless LNP testing is coordinated through the Wireless Testing Sub-Committee (“WTSC”)¹⁶, yet only a handful of CMRS providers and only two wireline providers participate in the WTSC.¹⁷ Sprint has completed Phase 1 “ICP Test Environment” testing with five wireless carriers, and one LEC has agreed to schedule Phase 1 tests with Sprint PCS.¹⁸ Sprint has completed Phase 2 “ICP Production Environment” testing with only one wireless carrier (an industry first), and Sprint has not completed Phase 3 “End-to-End” testing with any carriers; indeed, Phase 3 tests are currently scheduled with only 10 wireless carriers and two LECs.¹⁹ Due to the impending deadline and status of deployment, Sprint notes that it intends to focus most of its efforts on Phase 3 end-to-end testing, recognizing that ICP testing (Phase 1 and 2 testing) is necessarily included in Phase 3 testing.

In March, Sprint urged the Commission to require carriers to engage in intercarrier LNP testing upon request, noting that the “customer experience in porting a number from one carrier to another should not be put at risk because inadequate testing was performed prior to the availability of porting”²⁰ The Commission has not, to date, acted on this Sprint request. However, your September 9 letter suggests that you agree with Sprint on this point:

[E]ven if carriers have not finalized agreements, it is important that they begin testing with other carriers to ensure porting functionality by the November implementation deadline.²¹

¹⁵ To date, not a single LEC has submitted a *bona fide* request to Sprint PCS.

¹⁶ The WTSC is a subcommittee of the Wireless Number Portability Operations (WNPO) team which reports indirectly to the North American Numbering Council (NANC). NANC is the Federal Advisory Committee created to advise the Commission on numbering issues including LNP.

¹⁷ While the only wireline providers participating in the WTSC are Sprint (local division) and SBC, Sprint PCS has been in contact with the RBOCs including Verizon, Bell South, and Qwest, in order to negotiate testing.

¹⁸ See Attachments 4 and 7.

¹⁹ *Id.*

²⁰ Sprint Reply Comments, CC Docket No. 95-116, at 16 (March 13, 2003). See also Sprint Comments, CC Docket No. 95-116, at 19-20 (June 13, 2003)

²¹ Muleta Letter at 1.

In furtherance of the Commission's commitment to "ensur[ing] that there is a smooth and efficient process in place for consumers,"²² Sprint submits that the Commission must declare that all carriers are required to engage in LNP testing with carriers submitting a *bona fide* request – even if all LNP arrangements have not be finalized. Given that the LNP start date is rapidly approaching, the Commission should further specify that carriers shall use best efforts to conduct requested testing in a timely and professional manner.

Further, with respect to the testing issue, as a practical matter, it is not physically possible to conduct the full set of tests specified by industry guidelines with all carriers based on the November deadline. Accordingly, Sprint PCS and other carriers will be required to conduct a "triage" approach to testing, focusing its testing resources on those carriers that serve the greatest number of customers.

Finally, Sprint notes that, while your letter asks only about intercarrier testing, clearinghouses also play a critical role in the LNP environment and are an essential part of LNP testing.²³ Many of the technologies to be used by clearinghouses are new LNP infrastructure components; yet, these clearinghouse components have not been through rigorous performance testing in production-like environments. In Sprint's view, it remains unclear whether these components have the ability to handle peak porting volumes. Sprint continues to work with its clearinghouse vendors, but the Commission should be aware Sprint's concern. Indeed, it is Sprint's understanding that all the major wireless carriers are planning to use clearinghouses to facilitate LNP; as such, the Commission should recognize the importance of clearinghouse readiness to LNP deployment.

C. Consumer Education. Consumer education is essential for a "smooth and efficient" porting process. With the LNP start date two months away, consumer education should be underway. The Commission can play an important role by issuing a customer LNP advisory that the press can use in educating consumers.²⁴ Customers need to understand, for example, that porting a number to a different carrier may require them to purchase a new handset and that they may still be liable for early termination fees. The Commission should work with industry to develop such consumer education materials.

²² *Id.*

²³ Clearinghouse vendors—the network hubs and router links between individual carries engaged in a port transaction and to NPAC—include Telcordia, TSI, VeriSign and NightFire.

²⁴ The Consumer and Governmental Affairs Bureau often prepares Consumer Alerts and Factsheets, and it has prepared a Factsheet for LEC LNP, but not wireless LNP. *See generally* www.fcc.gov/cgb/consumerfacts/numbport.html. In this regard, the Australian Communications Authority has issued several factsheets and consumer brochures regarding wireless LNP. *See* www.aca.gov.au/telecomm/telephone_numbering/mobile_number_portability/consumer_info/consinfo_centre.htm.

The problem industry faces is that many of the details of wireless LNP have not been addressed, and carriers understandably are reluctant to provide too many details to consumers for fear that later Commission orders may be inconsistent with the assumptions carriers make in their customer education effort.

As an example, Sprint PCS recently developed materials for its sales force to use in educating its business customers about LNP. This undertaking proved difficult, however, because of the uncertainty concerning LNP implementation. For instance, in an effort to set customer expectations, only vague direction could be given with respect to the amount of time a port will take. Similarly, Sprint had difficulty predicting or describing the availability of LEC-to-wireless portability.

It is essential for the Commission to address outstanding LNP issues expeditiously. Perhaps the most important group of people involved with wireless LNP will be the thousands of carrier customer service personnel who interface with customers or prospective customers. For customer service employees to address customer inquiries, these employees must themselves be trained. Because of the problems of re-training thousands of employees, it becomes imperative that the Commission set the ground rules before most customer service representatives are trained.

* * *

Although the Commission has required LECs and wireless carriers to provide LNP within six months of a request, it did not state that carriers must commence the LNP coordination process at any particular point in time during the six month period. Additionally, many LECs in particular have decided that the Commission's "deploy in six months" rule nevertheless gives them the opportunity to impose additional conditions on making LNP available to their customers. Until the Commission closes these gaps, the LNP implementation process will remain chaotic and the consumer LNP process will be neither smooth nor efficient.

Sprint welcomes your information request to it and other "selected carriers." But as this letter and the attached answers demonstrate, Sprint urges the Bureau to ask the same questions of other carriers – both wireless and landline - and clearinghouse vendors. As the experience with Phase II E911 service confirmed, focusing attention on only a subset of the players involved in implementing a regulatory mandate will not ensure that the services the Commission expects will be provided or will be provided in a timely manner.

In June, Sprint recommended that the Commission postpone the national LNP start date by seven weeks so carriers would have further time to conduct "real life" tests before the LNP capability is activated nationwide.²⁵ While Sprint does not expect the

²⁵ See Sprint Comments, CC Docket No. 95-116, at 20-23 (June 13, 2003); Sprint Reply Comments, CC Docket No. 95-1164, at 16-18 (June 24, 2003). Sprint recommends that the Commission select several area codes or NPAs, preferably smaller ones, for the conduct of several field tests.

Commission to grant this request, it is important that the Commission recognize that absence of coordinated testing may affect porting processes to start, thereby jeopardizing carriers' abilities to ensure that "a smooth and efficient process [is] in place for consumers."

We appreciate this opportunity to provide information on our LNP deployment efforts and the issues we see impacting successful deployment. We also stand ready to answer any further questions you may have concerning our implementation efforts.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being electronically filed with the Secretary's office for filing in CC Docket No. 95-116.

Respectfully submitted,

/s/ Luisa L. Lancetti

Luisa L. Lancetti
Vice President, PCS Regulatory Affairs
Sprint Corporation
401 9th Street, N.W. Suite 400
Washington, D.C. 20004
202-585-1923

Scott R. Freiermuth, Attorney
Sprint Corporation
6450 Sprint Parkway
Mail Stop: KSOPHN0212
Overland Park, KS 66251
913-315-8521

Attachments

cc: David Solomon
Jennifer Salhus
David Furth
Cathy Seidel
Jared Carlson

**Sprint PCS Switches for which LNP Request Received
Kansas City MSA**

Switches in LERG		Location	Has LNP Request Been Received?
1	INDPMOCJCM0	Independence, MO	Yes
2	LENXKSGOCM0	Lenexa, KS	Yes
3	LENXKSGOCM1	Lenexa, KS	Yes
4	LENXKSGO1MD	Lenexa, KS	Yes
5	LENXKSGO2MD	Lenexa, KS	Yes

Carriers That Have Submitted LNP Requests to Sprint PCS

	Carrier Name	Top 100 Only		Top 100 & Outside Top 100
1	ALLTEL		X	
2	AT&T Wireless		X	
3	Centennial Communications		X	
4	Cincinnati Bell Wireless, LLC		X	
5	Cingular Wireless			X
6	First Cellular of Southern Illinois			X
7	Nextel		X	
8	NTELOS			X
9	Southern Communications Services Inc.		X	
10	T-Mobile			X
11	Triton PCS		X	
12	United States Cellular Corp.		X	
13	Verizon Wireless			X
14	Western Wireless Corporation		X	

NOTE 1: The Kansas City MSA is within the Top 100 MSAs.

NOTE 2: Sprint PCS has received no LNP requests from wireline carriers (LEC, ILEC, CLEC, RBOC).

NPAC TESTING

Date Completed	Comments
April 2003	<p>Sprint PCS completed Service Order Administration (SOA) Certification testing with the NPAC for its Release 3.2 in April 2003.</p> <p>Sprint PCS is using a production-hardened SOA module that has been in production since May 2001, and this module has been recertified with every NPAC release.</p>

CUSTOMER SERVICE TRAINING

Name of Channel	Scope of Training	Training Start	Training End	Completed	Total Hours
Customer Service	Regular	10/22/2003	11/22/2003	No	45,312
Port Resolution Center-Pilot Team	Complex	7/14/2003	8/20/2003	Yes	2,688
Port Resolution Center-Train the Trainers	Complex	8/25/2003	9/26/2003	No	6,048
Tier 1 Port Resolution Center Analysts	Complex	10/13/2003	11/23/2003	No	106,640
Tier 2 Port Resolution Center Analysts	Complex	10/13/2003	11/23/2003	No	39,200
Affiliates	Regular	11/3/2003	11/21/2003	No	8,400
Retail *	Regular	11/3/2003	11/21/2003	No	27,000
Business	Regular	11/3/2003	11/21/2003	No	1,900
Telesales	Regular	11/3/2003	11/21/2003	No	3,000
				Total	240,188

Regular = Must be able to answer customer questions, process a port request, and advise of status.

Complex = Must be able to do all of the above, plus trouble shoot and resolve all possible porting issues.

* Information contained in the "Retail" category pertains only to Sprint PCS stores and employees and does not apply to 3rd Party retail staff (e.g. Best Buy, Radio Shack, etc.). Sprint provides "train-the-trainer" to 3rd party retail outlets; further training is the responsibility of the 3rd party and corresponding hours are not reflected in this chart.

INTERCARRIER TESTING- WIRELESS CARRIERS

There are three (3) types of industry testing coordinated through the Wireless Testing Subcommittee (WTSC):

Test Phase	Definition
ICP Test Environment	The scope of this phase of testing is to execute test cases in Section 4.0 of the Inter-Carrier Test Plan Version 1.7. This will include Intercarrier Communications Process (ICP) to ICP message exchange only, and will focus on the carrier's ability to exchange port transactions within our Service Management Gateway (SMG) Test Environment.
ICP Production Environment	The scope of this phase of testing is to execute test cases in Section 4.0 of the Inter-Carrier Test Plan Version 1.7. This will include ICP to ICP message exchange only, and will focus on the carrier's ability to exchange port transactions within our SMG Production Environment.
End-To-End Production Environment	The scope of this phase of testing is to execute all sections of the Inter-Carrier Test Plan to include: Section 4.0 - ICP testing; Section 4.1 - Network Testing, and back-office validations utilizing production systems and production personnel.

INTERCARRIER TESTING- WIRELESS CARRIERS

1st Phase: ICP Test Environment				
Carrier	Start Date	Completed	Estimated Date of Completion	Comments
Cingular	03/11/03	Yes	n/a	
US Cellular	03/13/03	Yes	n/a	INDUSTRY FIRST: First successful port (SPCS & US Cellular) utilizing a clearinghouse (TSI)
Nextel	05/12/03	Yes	n/a	
Verizon Wireless	08/04/03	Yes	n/a	
Rural Cellular*	08/06/03	Yes	n/a	INDUSTRY FIRST: First successful port (SPCS & Rural Cellular) using TSI's FAX Server solution
T-Mobile	08/18/03	No	10/10/03	T-Mobile requested to reschedule
AT&T Wireless	09/15/03	No	09/26/03	In progress.
Leap Wireless*	09/22/03	No	09/27/03	
Dobson*	09/22/03	No	09/27/03	
Nextel Partners	09/29/03	No	10/03/03	
Triton	09/29/03	No	10/03/03	
Centennial Wireless	09/30/03	No	10/04/03	
Alltel	10/07/03	No	10/12/03	

* Designates carriers that do not provide service in the Kansas City MSA (i.e., do not have NPA/NXXs in the MSA), but a carrier with whom Sprint is testing.

INTERCARRIER TESTING- WIRELESS CARRIERS

2nd Phase: ICP Production Environment				
Carrier	Start Date	Completed	Estimated Date of Completion	Comments
Cingular	06/02/03	No	Postponed	Postponed. Cingular communicated they were not ready. Details not shared with us.
Rural Cellular*	07/28/03	No	Postponed	Postponed. TSI vendor not ready with FAX Server Solution for production environment.
Qwest Wireless*	08/18/03	No	Canceled	Canceled. Qwest Wireless canceled with no new target date provided.
Nextel	09/01/03	Yes	n/a	INDUSTRY FIRST: First successful port within a production environment between two trading partners.
Verizon Wireless	09/08/03	In Progress	09/26/03	In Progress

* Designates carriers that do not provide service in the Kansas City MSA (i.e., do not have NPA/NXXs in the MSA), but a carrier with whom Sprint is seeking to test.

INTERCARRIER TESTING- WIRELESS CARRIERS

3rd Phase: End-to-End Production Environment				
Carrier	Target Date	Completed	Estimated Date of Completion	Comments
Nextel	10/13/03	No	10/23/03	Testing will commence upon IT Release 27.1.
Verizon Wireless	10/13/03	No	10/23/03	" "
US Cellular	10/20/03	No	10/30/03	" "
AT&T Wireless	10/21/03	No	10/31/03	" "
Cingular	10/27/03	No	11/05/03	" "
Centennial Wireless	10/27/03	No	11/05/03	" "
T-Mobile	11/03/03	No	11/13/03	" "
Leap Wireless*	11/10/03	No	11/20/03	" "
Triton	11/10/03	No	11/20/03	" "
Alltel	11/11/03	No	11/21/03	" "

* Designates carriers that do not provide service in the Kansas City MSA (i.e., do not have NPANXXs in the MSA), but a carrier with whom Sprint is seeking to test.

NOTE: End-to-End Testing is expected to take approximately 10 days to complete.

Roaming Services for Customers with Ported Numbers

Sprint PCS' network compliance projects were completed with implementation of Number Pooling on 1/24/02. Sprint's roaming partners should have been able to support non-matching MDN and MSID values as of that date. We believe our existing contracts are adequate, thus we have not approached (nor been approached) by any roaming partner to renegotiate contracts in order to comply with WLNP. Sprint notes, however, that billing issues arise from time-to-time that require coordination with roaming partners to resolve.

Coordination with Wireline Carriers in Kansas City MSA

Company	Date BFR Sent	BFR Reply	OA/SLA Negotiations Underway	OA/SLA Complete	Date TPP Sent	TPP Reply	Trading Partner Profile Complete	Comments/Status
Alma Telephone Co	05/23/03	Letter 06/06/03	No	No	07/07/03	No response	No	Carrier requires interconnection agreement prior to LNP service.
Cass County Telephone Co	05/23/03	Letter 06/05/03	No	No	07/21/03	No response	No	6/5 Letter- Carrier believes SPCS BFR is deficient. SPCS must have NXXs assigned to the rate centers where SPCS has requested LNP; if not, then "location portability" not required by FCC. If SPCS chooses to move forward then SPCS must provide detailed description of interconnection requested by SPCS, the network facilities intended to be used and the number of ported lines, by year, expected over next 5 yrs. Carrier states it is not LNP capable; unresolved issues before FCC; and, interconnection agreement required prior to LNP service.
Citizens Telephone Co	05/16/03	Letter 05/21/03	No	No	07/14/03	No response	No	
KMC Telecom Ill, Inc.	05/23/03	No response	No	No	07/28/03	No response	No	
Lathrop Telephone	05/23/03	No response	No	No	07/28/03	Letter 8/14	No	8/14 Letter- Carrier believes it is exempt from FCC's requirements regarding LNP as they have not received a BFR. Carrier acknowledges receipt of correspondence "purporting to be a BFR," but Carrier finds BFR deficient. Carrier believes they are under no obligation to implement "location" portability.
MO-KAN Dial, Inc	05/16/03	Letter 06/18/03	No	No	08/11/03	Letter 09/04/03	No	6/18 Letter- Carrier states it is unclear whether FCC has required wireline carriers to provide LNP to wireless carriers. Premature to process LNP request until FCC resolves critical issues. If FCC requires carrier to provide LNP to wireless, carrier will need interconnection agreement that addresses direct connection and other interconnection related matters. 9/4 Letter- Carrier chooses not to exchange TPP information.
SBC / Southwestern Bell	05/23/03	No response	Yes	No	08/18/03	No response	No	While no written responses rec'd from SBC, the parties are in the process of negotiating an OA/SLA.
Sprint Communications (local division)	05/20/03	E-mail responses	Yes	See comment	08/18/03	Informal response	Yes	OA/SLA agreed to in principle; execution in process.
AT&T Local (TCG Kansas City, INC)	05/23/03	No response	No	No	07/07/03	No response	No	Contacted; negotiations refused. Directed to AT&T Local website.

BFR - bona fide request for deployment of LNP pursuant to 47 C.F.R. §§ 52.23 and 52.31.

OA/SLA - operations agreement or service level agreement; negotiated bilateral agreements to effectuate porting between two telecommunications carriers.

TPP - trading partner profile document sent by Sprint to carriers from whom Sprint has requested LNP. The trading partner profile contains the basic information necessary to facilitate the exchange of porting information between carriers such as Contact Names, Operating Company Number (OCN), Service Provider ID (SPID), LSR Version ID, FOC Version ID, WICIS Version ID, Hours of Operation, Primary/Secondary Porting Method, etc.

INTERCARRIER TESTING- WIRELINE CARRIERS

1st Phase: ICP Test Environment

Carrier	Start Date	Completed	Estimated Date of Completion	Comments
SBC	10/06/03	No	10/11/03	Facsimile testing.

NOTE: ICP Test Environment testing generally takes 5 days to complete.

2nd Phase: ICP Production Environment

None presently scheduled.

3rd Phase: End-to-End Production Environment

Carrier	Target Date	Completed	Estimated Date of Completion	Comments
Edge (Sprint CLEC)	11/03/03	No	11/13/03	Testing will begin upon PCS IT Rel. 27.1 and establishing connectivity and data protocol acceptance between TSI and Carrier.
Sprint Communications (local division)	11/03/03	No	11/13/03	Testing will begin upon PCS IT Rel. 27.1 and establishing connectivity and data protocol acceptance between TSI and Carrier.
SBC	In negotiation	No	In negotiation	Pending negotiation.
Bell South*	In negotiation	No	In negotiation	Pending negotiation.
Verizon*	In negotiation	No	In negotiation	Pending negotiation.
Qwest*	In negotiation	No	In negotiation	Pending negotiation.

* Designates carriers that do not provide service in the Kansas City MSA (i.e., do not have NPA/NXXs in the MSA), but a carrier with whom Sprint is seeking to test.

NOTE: End-to-End Testing is expected to take roughly 10 days to complete.