

LNP Problem/Issue Identification and Description Form

Submission Date	March 27, 2000
Company(s) Submitting Issue:	NENA
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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.)

9-1-1 address records are taking longer to update/change when number portability involved than 9-1-1 address records when number portability not involved.

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

A. Examples & Impacts of Problem/Issue:

Examples & Impacts of Problem/Issue: When a customer begins phone service with a local service provider and number portability is not involved, the needed 9-1-1 address record is normally added within a business day. When a customer moves and phone service is completely changed to the new location (same service provider, the needed 9-1-1 address record is normally changed within a business day.

When a customer ports (no move involved) to another local service provider, the donor service provider must send through a record unlocking the 9-1-1 address record (for security reasons, to prevent errors). The recipient service provider sends through a migrate record (which includes any customer record changes and the new service provider identification code). The migrate is processed after the unlock is sent and processed.

When a customer ports (move involved) to another local service provider, the donor service provider should send through a record deleting the current 9-1-1 address record. The recipient provider sends through a migrate (which is treated as an insert/add and includes the new customer address and new service provider identification code). The migrate is processed after the delete is sent and processed.

The two processes involving porting customers are taking longer to complete with some carriers than the two that do not involve porting.

A voluntary NENA standard is in place stating that the unlock/migrate or delete/migrate should take place the business date of NPAC activation (a matching time frame to that of regular customer moves and changes).

If the standard is not adhered to, the following can apply if a port and move is involved.

A customer moves and ports at the same time. The new phone service is NPAC activated and sent out to local SMSs about 9:00 A.M. on a Monday. The delete 9-1-1 record process is activated by the donor local service provider on Tuesday. The existing 9-1-1 address record is deleted in a batch process about 11:00 P.M. Tuesday. From 9:00 A.M. Monday until 11:00 P.M. Tuesday, the 9-1-1 address database contains the wrong address for the customer.

The migrate/insert record process is activated by the recipient local service provider on Wednesday. The new 9-1-1 address record is migrated/inserted in a batch process about 11:00 P.M. Wednesday. From 11:00 P.M. Tuesday until 11:00 P.M. Wednesday, there is no customer record in the 9-1-1 address database.

If that phone generates a "no voice contact" 9-1-1 call during the above time periods of 38 hours and 24 hours, the 9-1-1 answering point will either receive a wrong address or no address, respectively.

A "no voice contact" 9-1-1 call can be a medical call where the caller is unable to speak, a fire call where part of the local equipment has burned or melted before the caller can provide details, or a law enforcement call, such as domestic violence, where the phone was grabbed from the caller or the cable ripped from the wall.

B. Frequency of Occurrence:

Twice a Week.

C. NPAC Regions Impacted:

Canada__ Mid Atlantic __ Midwest__ Northeast__ Southeast__ Southwest __ Western__
West Coast __ ALL_X_

D. Rationale why existing process is deficient:

Reference the above frequency question, this appears to be daily. 9-1-1 service providers across the country report several thousand 9-1-1 address records in an "unlock" state awaiting the "migrate" from recipient local service providers, some several days or longer.

A national local service provider reports hundreds to thousands of "migrates" in some areas not being processed within the business day NENA standard.

The FCC LNP orders state that emergency services (E9-1-1) should not have negative impacts from number portability.

9-1-1 callers should not be subject to a lower standard of emergency services (incomplete/inaccurate address records) simply because they have ported.

A recipient local service provider of a ported customer should have accurate information within the 9-1-1 address database on a timely basis.

The donor local service provider of a ported customer should not have to trace down why large numbers of 9-1-1 address records have not been taken over by the responsible recipient local service providers.

E. Identify action taken in other committees / forums:

NENA (National Emergency Number Association) has developed 9-1-1/number portability standards with the participation of 9-1-1 representatives from more than thirty local service providers in the U.S. and Canada.

These standards closely follow those in place for non-ported customer activity (within the same time frames).

The unlock/migrate process (for customers' porting) should be completed the same business date as NPAC activation. This standard was adopted in June, 1997.

The delete/migrate process (for customers' porting and moving) should be completed the same business date as NPAC activation. This standard was adopted March 11, 2000.

They are voluntary standards and there are an increasing number of local service providers that are not active in 9-1-1 standards' setting.

The above standards were presented to the OPWEST March 22 committee meeting. Also in attendance were members from the LNP East committee.

OPWEST members approved supporting their companies' move towards compliance.

F. Any other descriptive items:

3. Suggested Resolution:

We are seeking LNPA-WG approval of the NENA 9-1-1 LNP standards as needed to protect 9-1-1 in an LNP environment along with submission from the LNPA-WG to NANC for any needed approval.

We will be attending the next LNPA-WG meeting and can address this issue.

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LNPA WG: (only)

Item Number: 0006

Issue Resolution Referred to: _____

Why Issue Referred: _____

