MAINE

END-USER MIGRATION GUIDELINES

CLEC to CLEC

and

CLEC to VERIZON

Table of Contents

I. Introduction

These guidelines have been adapted from the Migration Guidelines approved for use in New Hampshire by the New Hampshire Public Utilities Commission on August 15, 2003, in Order No. 24,200. In a series of workshops, representatives from Maine competitive local exchange carriers (CLECs), Verizon, and Maine PUC Staff edited this document for Maine use.[1] This editing has included the following:

1. Editing for clarity or to correct errors; and

2. Including negotiated changes to revise New Hampshire processes for Maine use.

The objective of these guidelines is to ensure that end users can migrate from one CLEC to another CLEC or from a CLEC to Verizon Maine without encountering undue delays, service problems, slamming, cramming, or cumbersome procedures. End user migration should occur in a seamless and timely fashion for the benefit of the end user. To that end, these guidelines establish general business rules, privacy protocols, general procedures and LEC responsibilities governing such migrations.

These guidelines apply to all CLECs and Verizon for migrations of an end user between CLECs or away from a CLEC to Verizon. Business rules, protocols and procedures for the migration of end-users from Verizon to CLECs are not addressed here.

The Parties working on these guidelines support the development of consistent, statewide procedures as the best means to further competition and allow for the seamless migration of end users. It is hoped that these guidelines will serve as a model for reasonable behavior against which to evaluate particular situations on a company-by-company basis.

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[1] A list of the workshop participants is in Appendix D.

These guidelines will be used as a basis for migrations of data services within Digital Subscriber Line Service (DSL), line-sharing, line-splitting and data lines to the extent that the guidelines can accommodate the process and deployment differences between voice and data migrations, until specific guidelines for these services are adopted.

Specific CLEC migration disputes will be referred to the PUC's Rapid Response Process Team for dispute resolution.

II. Commonly Used Abbreviations and Terms

ATIS	Alliance for Telecommunications Industry Solutions
BTN	Billing Telephone Number
Bundled Service	For the purposes of this document, Resale and UNE-P services will be considered bundled services.
Business Day	A single business day is from the time a request is received to that time the following day, not including weekends or holidays.
Circuit ID	The NSP-assigned Loop Circuit Identification Number
CLEC	Competing Local Exchange Carrier
Cramming	Billing an end user for services they did not request.
CSI	Customer Service Information record. The CSI may include information that may not be available on a CSR, such as end user network configuration information (e.g., circuit ID or TXNU) or transition information (TI). .
CSR	Customer Service Record, which refers to a comprehensive document that includes all relevant customer contact and service information, as described herein.
DMARC	The point of demarcation between two carriers.
DSL	Digital Subscriber Line service
DSP	Directory Service Provider. For these guidelines, in Maine, the DSP is Verizon.
End User	Customer whose service is being migrated.
FCC	Federal Communications Commission
FOC	Firm Order Commitment
Hot Cut	A coordinated physical move of a working line to a new service arrangement with the goal of minimizing service interruption to the end user.
ILEC	Incumbent Local Exchange Carrier. For these guidelines, the ILEC is always Verizon Maine.
IPIC	International Preferred Interexchange Carrier. The interLATA carrier to which international calls are routed. The PIC and IPIC are the same carrier, unless an IPIC is specifically selected by the end user.
LEC	Local Exchange Carrier, a term that includes CLECs, Independent Telephone Companies and Verizon.
LNP	Local Number Portability
LOA	A Letter of Authorization from the end user as defined in the FCC Guidelines on Slamming.

LPIC	Local Preferred Intraexchange Carrier. The intraLATA carrier to which traffic from a given telephone number is automatically routed when dialing in equal access areas.
LSOG	The current version of the Local Service Ordering Guidelines.
LSP	Local Service Provider
LSR	Local Service Request
NID	Network Interface Device
NSP (Loop)	Network Service Provider of the Loop, the carrier providing the circuit to the end user.
NSP (Switch)	Network Service Provider of the Switch, the carrier providing the dial tone to the end user.
NPAC	Number Portability Administration Center
NSP	Network Service Provider. This includes both NSP (Loop) and NSP (Switch) unless the loop or switch designation is used.
OBF	Ordering and Billing Forum, a national forum managed by ATIS, defined above.
PIC	Preferred Interexchange Carrier. The interLATA carrier to which traffic from a given location is automatically routed when dialing 1+ in equal access areas.
POTS	Plain Old Telephone Service
PUC	Maine Public Utilities Commission
Slamming	The practice of changing an end user's local service provider or long distance carrier selection (PIC or LPIC) without the end user's knowledge and/or explicit authorization. Slamming is further defined in the Federal Slamming Rules.
TN	Telephone Number
TXNU	(slang for Circuit ID) The most common initials used for a 2-wire loop request for a "TXNU number" is a request to provide the Circuit ID, whether it has TXNU in it or not.
UNE	Unbundled Network Element (individual elements of the network that the ILEC makes available to competitors)
UNE-L	Unbundled Network Element - Loop
UNE-P	Unbundled Network Element - Platform
USOC	Uniform Service Offering Code. The system of product codes maintained by Telcordia and used by many service providers, including Verizon Maine.
Verizon	Verizon Maine

III. General Principles

The following general principles form a foundation for establishing operational procedures that ensure that end users can migrate as they choose from one local service provider to another local service provider without encountering undue delays, unwanted privacy intrusions, service problems, or cumbersome procedures.

1. If the end user has requested that their LSP not be changed without specific authorization, i.e., where the end user has requested a Local Service Provider Freeze , the end user must authorize the removal of the carrier freeze with the Old LSP, in accordance with Federal Slamming Rules. *See* 47 C.F.R. § 64.1190 (e). Once an Old LSP has received a request to remove an end user's Local Service Provider Freeze, the Old LSP must lift the freeze, or take the required steps to have the Old NSP lift the freeze, within one business day.

2. No service provider may put a carrier freeze on an end user's line without the end user's authorization, as described in the Federal Slamming Rules. *See* 47 C.F.R. § 64.1190 (d).

3. It is the end user's choice to migrate from one LSP to another. Neither the Old LSP nor the Old NSP may block an end user's desire to migrate or to port a telephone number of an active account for any reason, including unpaid amounts owed. Notwithstanding the end user's choice to migrate, the New LSP retains the right to impose requirements on an end user that are permissible under PUC rules or any applicable state or federal law (e.g., deposit requirements).

4. Carriers should follow consistent methods for data exchange to facilitate end user migrations.

5. The end user is informed by the New LSP of all pertinent aspects of the migration.

6. Carriers should work together in good faith to avoid and/or minimize any problems for the migrating end user such as service interruptions, billing problems, and pending orders.

7. Each carrier will maintain information for distribution to all other carriers on demand. This information is to include:

    a. The carrier's established processes and procedures for end user migration from that carrier to another carrier, and

    b. The carrier's escalation process and a contact list for escalations.

The preferred method of making the information available is for the carrier to maintain a web site, the address of which is filed and kept up to date with the PUC. The PUC will maintain a web site of LECs that includes each company's web site and telephone number. Carriers may choose to make the information available by fax or email, instead of through a web page, provided that the information is given to any carrier within two (2) business hours of that carrier's request for the information.

In addition, each CLEC will place on file with the PUC their escalation process and contact list for escalations. At a minimum, this list must include a contact for technical operations issues and a contact for escalation/policy issues.

8. The carrier's processes and procedures shall be consistent with all applicable federal and state regulations.

9. Carriers will abide by all PUC Rules, including those on cramming and slamming.

10. The end user's privacy is to be respected by all LSPs.

11. Carriers will abide by the FCC/Federal Trade Commission (FTC) "Statement on Deceptive Advertising" for local service migrations (*see* Appendix A for a copy of the statement).

12. Compliance with these guidelines will be considered *prima facia* evidence of reasonable conduct when migrating an end user between CLECs or from a CLEC to Verizon.

IV. Common Migration Responsibilities of Carriers

When an end user either queries a LSP about migrating to that carrier, or actually migrates, the involved carriers have the following responsibilities:

1. The New LSP deals directly with the end user.

2. To request a CSR from the end user's current LSP, the requesting LSP must have obtained end user authorization. The authorization to view a CSR need not be sent to the current LSP.

3. A company can be both a LSP and a NSP at the same time.

4. There can be multiple NSPs involved with a service (e.g., one carrier could provide the loop and another carrier the port).

5. The New LSP will provide the LSR information to the NSP(s).

6. Authorization is not required from the Old LSP for the New LSP to reuse portions of the network that were provided to the Old LSP by another NSP(s), nor may the Old LSP prohibit such reuse. However, reuse only applies to facilities that are no longer needed by the Old LSP to provide service to the migrating end user or any other end users.

7. The New LSP will be responsible for the coordination required to migrate an end user.

8. Partial migrations. In the case of a partial migration, the New LSP shall be responsible for determining the end user's requirement for the new account. The New LSP is responsible for advising the end user to communicate with the Old LSP for arrangement of numbers remaining with the Old LSP.

9. End-user expectations. When an end-user migrates his services from an Old NSP to a New NSP, the complete migration may take a full day to complete. There are times when not all service options can be turned up at the same time, e.g., Calling Cards, Directory

Assistance, and Intra-switch calls from the Old NSP. Thus, it is important that the end-user and each of the migrating carriers be made aware of the cutover process and any delays that may be encountered. Finally, the New LSP will be responsible for managing the end-user's expectations.

10.   End-users who have been permanently disconnected by a CLEC and subsequently purchase service from a New LSP may not be able to port the disconnected number to the New LSP.

11.   Porting Telephone Numbers. To minimize the possibility of a service interruption, LECs should abide by the practices listed below. These practices will allow telephone numbers to be ported on the cutover date and also allow, in certain instances, for the cutover to be reversed if it is unsuccessful.

    a.   When a notice of cutover is received, the Old NSP (Switch) and the New NSP (Switch) shall, where technically feasible, build a port trigger in their telephone number translations at least one day prior to the cutover date (i.e., due date minus one). The port trigger will query the appropriate LNP Routing Database every time a call is placed to the telephone number that is being cut over. The database will direct the call to the appropriate switch.

    b.   When 10 digit triggers are available, the Old NSP (Switch) will leave the telephone number translations in its switch until at least 11:59 PM the day of the cutover. When 10 digit triggers are not available (e.g., Direct Inward Dial Trunks, or other trunk side terminations), the translations will be disabled at the time of cutover.

    c.   When a LSR for a TN port is received, the Old NSP (Switch) shall provide a FOC back to the New NSP (Switch) confirming the due date.

d. When the UNE-Loop is being reused, planned coordination may be required between the Old NSP and the New NSP based on timing (e.g., Frame Due Time).

12. Trouble-Shooting Porting Problems.

a. Should the New LSP require cancellation or rescheduling of the port, it will submit a supplemental LSR with a revised due date. All parties shall work together to ensure the supplemental LSR is processed on a timely basis to avoid potential service interruption to the end user. Cancellations or rescheduling requested on the day of the port may require person-to-person notifications and coordination.

b. The New LSP will have primary responsibility for coordinating any service restoration that may become necessary due to problems with a scheduled port. All parties will cooperate fully to complete service restoration.

13. Loss Notification. The Old NSP (Switch) will provide a loss notification to the Old LSP when the Old NSP and the Old LSP are not the same company. When the Old NSP and Old LSP are the same company the LSR sent by the New LSP to the Old LSP will serve as the notification that the end user has migrated.

14. E9-1-1. E9-1-1 is only impacted in those situations where the NSP (Switch) changes. The Old NSP (Switch) must unlock the E9-1-1 record. This will allow the New LSP/New NSP to lock the E9-1-1 record, take responsibility for this record, and change the listing information as applicable. The new switch provider is responsible for inputting the new listing information into E9-1-1 database and for inputting information to identify itself as the end user's new carrier. This will lock the E9-1-1 database for that end user. The E9-1-1 database administrator will send out a report on unlocked records. Timing can be a problem with E9-1-1 inputs if the New NSP tries to migrate the record and the Old NSP

has not unlocked it. New inputs are recycled for 72 hours to eliminate some of these timing issues, but it is important for the Old NSP to unlock the E9-1-1 database in a timely fashion. The E9-1-1 database is locked when the order is completed.

15. Directory Listings. In the case of UNEs, standalone directory listings may exist. To the extent that directory listings cannot be migrated from one account to another, such listings must be deleted by the Old LSP, and added by the New LSP. Directory listing information should be submitted to Verizon on an LSR. Thus, even if Verizon is not involved in the migration, an LSR should be submitted to Verizon to indicate the New LSP for that listing. The Old LSP will delete standalone directory listings within 48 hours after the completion of the migration.

16. Pending Orders. To the extent that pending orders in the Verizon system inhibit newer orders, the following guidelines apply:

    a. If a pending order was placed by the end user, the New LSP will contact the end user to have the order cancelled.

    b. If a pending order was placed by the Old LSP, the Old LSP will cancel the order, unless it can be shown that such cancellation will have an undesired affect on the end user's service.

    c. The New LSP is responsible for coordinating the resolution of such conflicts.

17. The due date interval for completion of all migrations should be the same as the ILEC's wholesale migration interval.

V. Exchanging Customer Service Records

To facilitate local service migration in a timely and seamless manner, it is necessary to have a procedure for exchanging CSRs and/or CSIs in a timely and acceptable manner. In general, these procedures must meet the end user's needs for privacy, the LEC's need for information, and must include safeguards to ensure that the end user has approved the exchange of his/her records.

While sharing a CSR is an important element of end-user migration, the sharing of a CSR shall not violate an end-user's privacy or create inequitable marketing practices. A potential New LSP may not acquire a CSR without end user authorization. The Old LSP is prohibited from approaching an end user to retain that end user as a result of receiving a request for a CSR from a potential New LSP.

A. Definition of Customer Service Records

The following information, if applicable, must be submitted by an Old LSP whenever a New LSP requests a copy of a CSR that meets the guidelines laid out in Section V. C, below. This is baseline CSR information.

1. Billing telephone number (BTN).

2. All working telephone numbers.

3. Complete end user billing name and address.

4. Directory listing information including directory section, listing name, address, listing type, yellow page headings, etc.

5. Complete service address (including floor, suite, unit, etc.).

6. Current PICs (inter/intraLATA toll) including freeze status.

7. Local freeze status, if applicable.

8.   All vertical features (e.g., custom calling, hunting, etc.), including hunt group patterns.

9.   All options (e.g., Lifeline, 900 blocking, toll blocking, remote call forwarding, off premises extensions, etc.).

10.   Tracking number or transaction number (e.g., purchase order number).

11.   Service configuration information (resale, UNE-P, unbundled loop, facilities-based).

12.   Identification of all NSPs.

13.   Identification of any line sharing/line splitting on the migrating end user's line.

B.   Definition of End User Authorization

There are two general situations when a carrier may need to request aCSR. The first is during negotiations for service with a potential end user. The second is when an end user has agreed to migrate to another company. When a LEC (i.e., the "reviewing company") has permission from the end user to review the end user's account, the reviewing company can request a CSR or equivalent information from the current LSP, if the reviewing company has one of the following types of end user consent:

1.   A letter of authorization from the end user to review his/her account, or

2.   A third party verification of the end user's consent, or

3.   A recording verifying permission from the end user to review his/her account, or

4.   Oral authorization given by the end user.

The reviewing company must indicate to the current LEC that it has obtained one of these types of consent. The current LSP cannot require a copy of the end user's authorization from the reviewing company.

When a New LSP has permission from the end user to switch LSPs, the New LSP can request the end user's CSR and/or CSI, or equivalent information, from the Old LSP if it has one of the following types of end user consent:

1. A written or electronic signature letter of authorization from the end user to switch local carriers, or

2. A third party verification of the end user's request, or

3. A third-party recording of the third party's verification of the end user's request to switch local carriers.

The New LSP must indicate to the Old LSP that it has on file one of these certifications of consent, and must keep this certification on file for two years for third party auditing purposes. The Old LSP cannot require a copy of the end user's authorization from the New LSP.

C.   Format of a Request for a CSR

Appendix B contains a sample, optional form for use in requesting a CSR.

The following information must be provided by the requesting carrier in order to obtain a CSR:

1. The BTN, account number, or a working telephone number on the end user's account.

2. End user's service address.

3. An indication of end user's consent to review the CSR.

4. End user's name.

5. A tracking number for the request.

6. Who to and where to respond with the CSR information.

7. A telephone number and contact person for questions about the CSR request.

8. The name of the company requesting the CSR.

9. The date and time the request was sent.

10. What method to use to respond with the CSR information.

D. Form and Content of a CSR Response

Appendix C contains a sample, optional form for use in responding to CSR requests involving potential migrations of bundled residence and bundled business (up to and including ten lines) services. This form can be used when transmitting a CSR response via facsimile or e-mail. This form may also be available for review on the Old LSP's website. If a LEC chooses not to use the sample form, it must still provide the information identified in Appendix C when responding to CSR requests involving these types of migrations.

E. Transmission of CSR Information

In general, the transmission of the CSR request and the CSR response can be some form of electronic means; such as facsimile, electronic mail, electronic data interchange, website access, or any other means negotiated between the two carriers. In any event, the request cannot be via oral means (e.g., voice telephone call). Carriers may specify preferred and alternate means of transmission at their discretion. All LECs must at a minimum allow transmission of CSR information to the requesting LEC by facsimile.

A LEC may not withhold CSR or CSI information, or fail or refuse to take any action necessary to migrate an End User's service, on the ground that the End User has an unpaid balance or otherwise owes or would owe it money.

F. Timing

Upon issuance of these Guidelines, 80% of requested CSRs shall be provided within two business days. Six months after issuance, 80% must be issued within one business day.

During the twelve months following the issuance of these guidelines, an additional business day will be allowed for CSR requests involving over ten lines except for project and mass migrations or complex migrations. Project, mass migration, or complex migration CSR intervals will be negotiated.

VI. Exchanging End User Network Information

In addition to a CSR, there may be a need to obtain end user network configuration information (i.e., Customer Service Information or CSI) to migrate an end user. Carriers should share all network specific information of a technical nature necessary for the successful migration of end users. Specifically, there will be a need to provide circuit IDs when a loop must be migrated. The Old LSP should maintain circuit identification information and provide it to a New LSP for any UNE-L migration if the facility is reusable. If reusable, when requested, the circuit ID shall be provided with the CSR or within 24 hours of the CSR being provided. In addition, providing the circuit ID to the New LSP by the Old LSP constitutes confirmation by the Old LSP to reuse facilities. The New LSP must obtain the circuit ID from the Old LSP in order to be sure that reuse of facilities is possible.

VII. Local Service Requests[2]

The LSR supports the following scenarios:

1.   Porting a telephone number

2.   Porting a telephone number and reusing the UNE-L facility.

3.   Reusing the UNE-Loop facility and not porting the telephone number.

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[2] Sample LSR forms for typical CLEC to CLEC orders for migrations are available from the ATIS-OBF Manager at 202-628-6380, or may be downloaded from the ATIS website at http://www.atis.org/.

4.   Partial migrations.

All CLECs should accept any LSR that meets the ATIS-OBF specifications.   Furthermore,

the LSR should be sent through agreed upon electronic media or mailed when certain volume

thresholds (as agreed upon by the LECs) are met.

It is recommended that any CLEC planning to initiate service order activity with another

CLEC should contact the other CLEC's website and/or handbooks to understand the business

arrangements, contacts, and procedures associated with that CLEC.

VIII.   Notification Responses

A LSR response is either a Firm Order Commitment (FOC), or a rejection notification

that the LSR contains an error. The applicable response will be furnished within two business

days of receipt of the LSR. Project and mass migrations or complex migration FOC intervals

will be negotiated, with an initial response to be made within two business days.[3] One

completion notice must be issued after billing and provisioning are completed.

The Old NSP (Switch) will furnish a loss notification to the Old LSP within five business

days of the cutover.

IX.   Procedures for Specific Migration Scenarios

In setting procedures for migration, 16 basic types of CLEC migrations are addressed in

these guidelines. These types are listed in the table below. All scenarios have certain common

carrier responsibilities, which have been previously defined in Section IV under Common

Migration Responsibilities of Carriers. In addition, there are common processes that are

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[3] No provisioning completion notice is required on completion of LNP-only orders.

applicable to all of the migration scenarios. These common migration scenario responsibilities are also addressed in Section IV.

Please note that in identifying the process steps for the various types of migrations, the process steps do not include all of the potential confirmations, inquiries, jeopardy notices, and supplemental orders that may or may not be a part of any migration depending upon circumstances.

The functions of the Directory Service Provider (DSP) are addressed only where additional steps are required to migrate a standalone UNE listing account (facilities-based migrations).

The following scenario descriptions are currently limited to Plain Old Telephone Service (POTS), Integrated Services Digital Network Basic Rate (ISDN BRI), Public Payphone Lines and Centrex services. Additional requirements may be necessary for other types of services (e.g., Direct Inward Dialing and Special Services). For analysis purposes, the migration scenarios will be categorized as bundled or unbundled serving arrangements.

Bundled serving arrangements are resale or UNE-P serving arrangements where the network service provider furnishes all of the facilities. Unbundled serving arrangements are UNE-Loop and full facilities based serving arrangements where the LSP furnishes some or all of the facilities. The scenario numbers listed for each migration relate to the sixteen scenarios listed in the chart below.

Scenario #	Initial State	End State
1	CLEC #1 via UNE-P (or commercial alternative to UNE-P "CA UNE-P")	CLEC #2 via Resale
1	CLEC #1 via UNE-P or CA UNE-P	CLEC #2 via CA UNE-P
2A	CLEC #1 via UNE-P or CA UNE-P	CLEC #2 via Loop
2B	CLEC #1 via UNE-P or CA UNE-P	CLEC #2 via Facilities-Based Services
1	CLEC #1 via Resale	CLEC #2 via Resale
1	CLEC #1 via Resale	CLEC #2 via CA UNE-P
2A	CLEC #1 via Resale	CLEC #2 via Loop
2B	CLEC #1 via Resale	CLEC #2 via Facilities-Based Services
3B	CLEC #1 via Loop	CLEC #2 via Resale
3B	CLEC #1 via Loop	CLEC #2 via CA UNE-P
4A or 4B	CLEC #1 via Loop	CLEC #2 via Loop
4C	CLEC #1 via Loop	CLEC #2 via Facilities-Based Services
3A	CLEC #1 via Facilities-Based Services	CLEC #2 via Resale
3A	CLEC #1 via Facilities-Based Services	CLEC #2 via CA UNE-P
4E	CLEC #1 via Facilities-Based Services	CLEC #2 via Loop
4D	CLEC #1 via Facilities-Based Services	CLEC #2 via Facilities-Based Services

Scenario 1: Bundled to Bundled

Migrations   Resale to Resale
              Resale to CA UNE-P
              UNE-P or CA UNE-P to Resale
              UNE-P or CA UNE-P to CA UNE-P

Description   This migration involves the reuse of Loop facility and retains the end user telephone number. The New LSP and the Old LSP provide service to the end user by leasing bundled services from a NSP. In the bundled migrations, the NSP remains unchanged throughout the migration.

Process

1.   New LSP obtains authority from end user to access CSR and/or CSI to migrate the end user.

2.   New LSP acquires the CSR and/or CSI using one of two methods:

      a.   Contact Old LSP to request a CSR (Recommended).

      b.   Contact end user ("Blind" or without knowledge of the CSR or TI.)

3.   Old LSP responds to the CSR request.[4]

4.   New LSP and end user negotiate for services and features.

5.   New LSP issues LSR to NSP requesting a migration of service.

6.   NSP sends confirmation to New LSP of LSR Due Date.

7.   NSP performs necessary work steps to complete the migration and sends a provisioning completion notice to New LSP and, if applicable, the billing completion notice.

8.   NSP sends Loss Notification to Old LSP after the cutover.

9.   Old LSP issues LSR to DSP to remove directory listing(s) if located on a standalone UNE listing account.

Notes   For a partial migration, if necessary, the NSP will designate a new Billing Telephone Number (BTN) on the Old LSP end user's account.

              Concurrent with the migration of lines and telephone numbers (TNs) disconnection of other line(s) and/or TNs is allowed for the same end user at the same service address.

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[4] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

Responsibilities by Carrier

New LSP   Obtains authority from end user.

                    Acquires current end user service information.

                    Negotiates for services and features with end user.

                    Issues LSR to NSP requesting a migration of service.

Old LSP   Responds to CSR request.

                    Issues LSR to DSP to remove Directory Listing(s) if located on a standalone UNE listing account.

NSP   Validates the LSR and sends applicable confirmations to the New LSP.

                    Migrates service.

                    Sends provisioning completion notice to New LSP.

                    Sends billing completion notice. (if applicable)

                    Sends Loss Notification to Old LSP.

Scenario 2: Bundled to Unbundled

2A. UNE-P or Resale to UNE-L with LNP

Migrations   UNE-P to UNE-L
                    Resale to UNE-L

Description   This migration involves reusing the existing Loop facility and retaining the end user's telephone number. The Old LSP serves the end user via bundled services leased from a NSP. The New LSP serves the end user via its own switch (becoming the NSP (Switch)), and an unbundled Loop, making the loop provider the NSP (Loop). This migration requires a coordinated hot cut where the Loop facility must be disconnected from the Old NSP's switch and connected to the New NSP's cage.

Carriers   The Old NSP becomes the New NSP (Loop).

                    The New LSP is the New NSP (Switch).

Process

1.   New LSP obtains authority from end user to access CSR and/or CSI and to migrate the end user.

2.   New LSP acquires current CSR and/or CSI using one of two methods:

    a.   Contact Old LSP to request a CSR (Recommended).

    b.   Contact end user ("Blind" or without knowledge of the CSR or TI.)

3.   Old LSP responds to the CSR request.[5]

4.   New LSP and end user negotiate for services and features.

5.   New LSP issues LSR to New NSP (Loop)/Old NSP/DSP (these are all the same company) in order to:

    a.   Convert UNE-P/Resale account to an unbundled Loop facility.

    b.   Issue order to release telephone number in NPAC by Due Date minus one.

    c.   Establish Directory Listing(s).

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[5] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

6. New NSP (Loop):

    a.   Sends confirmation to New LSP of LSR Due Date with Circuit ID Information (e.g. TXNU numbers).

    b.   Issues order to release the telephone number in NPAC by Due Date minus one.

7. Old NSP converts the UNE-P/Resale line to an unbundled Loop facility (performs a hot cut). (This now makes the Old NSP the New NSP (Loop).)

8. Old NSP on Due Date, disconnects bundled account and removes the Directory Listing(s) on the account.

9. New NSP (Switch) activates telephone number port in NPAC.

10. New NSP (Loop)/Old NSP/DSP establishes Directory Listing(s).

11. Old NSP unlocks E9-1-1 database after order completion.

12. New NSP (Switch) locks E9-1-1 database.

13. Old NSP sends loss notification to the Old LSP after the cutover.

14. Old LSP issues LSR to DSP to remove Directory Listing(s) if located on a standalone UNE listing account.

Responsibilities by Carrier

New LSP   Obtains authority from end user.

               Acquires current end user service information.

               Negotiates for services and features with end user.

               Activates telephone number port in NPAC.

               Locks E9-1-1 database.

               Issues LSR to New NSP (Loop)/Old NSP for reuse of Loop facility, telephone number porting and Directory Listing(s).

Old LSP   Responds to CSR request.

               Issues LSR to DSP to remove Directory Listing(s) if located on a standalone UNE listing account.

NSP   Validates the LSR and sends applicable confirmations to the New LSP.

               Migrates service.

               Sends provisioning completion notice to New LSP.

               Sends billing completion notice. (if applicable)

               Sends Loss Notification to Old LSP.

Old NSP/New NSP (Loop)/DSP

Sends confirmation of LSR Due Date with Circuit ID Information.

Issues order to release telephone number in NPAC by Due Date minus one.

Converts the UNE-P/Resale line to an unbundled Loop facility

Performs Hot Cut.

Moves the cable and pair from the Old NSP switch and points it to the New NSP (Switch).

Disconnects bundled account.

Unlocks E9-1-1 database after order completion.

Removes old Directory Listing(s).

Establishes new Directory Listing(s).

Sends Loss Notification to the Old LSP

2B. UNE-P or Resale to Facilities-Based Service with LNP

Migrations   UNE-P to Facilities-Based Service
Resale to Facilities-Based Service

Description   This migration involves disconnecting the existing Loop facility while retaining the end user's telephone number. The Old LSP serves the end user via bundled services leased from a NSP. The New LSP serves the end user via its own Switch and Loop facility (New NSP. The end user retains the telephone number.

Carriers   The New LSP is the New NSP

The Old NSP is the Directory Service Provider (DSP).

Process

1.   New LSP obtains authority from end user to access CSR and/or CSI and to migrate the end user.

2.   New LSP acquires current CSR and/or CSI using one of two methods:

a.   Contact Old LSP to request a CSR (Recommended).

b.   Contact end user ("Blind" or without knowledge of the CSR or TI.)

3.   Old LSP responds to the CSR request.[6]

4.   New LSP and end user negotiate for services and features.

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[6] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

5.   New LSP issues LSR to Old NSP to release telephone number in NPAC by Due Date minus one.

6.   Old NSP sends confirmation to New LSP of LSR Due Date.

7.   New LSP issues LSR to DSP to establish new Directory Listing(s).

8.   Old NSP issues order to release the telephone number in NPAC by Due Date minus one.

9   Old NSP on Due Date disconnects bundled account and removes old Directory Listing(s) associated with the bundled account.

10.   New NSP/New LSP activates telephone number port in NPAC.

11.   Old NSP unlocks E9-1-1 database when order is completed.

12.   New NSP/New LSP locks E9-1-1 database.

13.   DSP establishes new Directory Listing(s).

14.   Old NSP sends Loss Notification to the Old LSP when order completed.

15.   Old LSP issues LSR to DSP to remove Directory Listing(s) if located on a standalone UNE listing account.

Responsibilities by Carrier

New LSP   Obtains authority from end user.

Acquires current end user service information.

Negotiates for services and features with end user.

Issues LSR to Old NSP for telephone number porting.

Issues LSR to DSP to establish new Directory Listing(s).

Old LSP   Responds to CSR request.

Issues LSR to DSP to remove Directory Listing(s) if located on a standalone UNE listing account.

Old NSP   Sends confirmation to New LSP of LSR Due Date.

Issues order to release telephone number in NPAC by Due Date minus one.

Disconnects bundled account.

Unlocks E9-1-1 database when order completed.

Removes old Directory Listing(s).

Establishes new Directory Listing(s)

Sends Loss Notification to the Old LSP.

New NSP   Activates telephone number port in NPAC.

Locks E9-1-1 database.

3. Unbundled to Bundled

3A. Facilities Based Service to Resale or CA UNE-P

Migrations   Facilities-Based Service to CA UNE-P
Facilities-Based Service to Resale

Description   This migration involves disconnecting the existing CLEC loop facility while retaining the end user's telephone number. The Old LSP serves the end user via its own Switch and Loop facility (Old NSP). The New LSP serves the end user via bundled services leased from a New NSP. The end user retains the telephone number.

Carriers   All carrier designations are new. The Old NSP and the Old LSP will change to a New NSP and New LSP. The New NSP is the Directory Service Provider (DSP).

Process

1.   New LSP obtains authority from end user to access CSR and/or CSI and to migrate the end user.

2.   New LSP acquires current CSR and/or CSI using one of two methods:

    a.   Contact Old LSP to request a CSR (Recommended).

    b.   Contact end user ("Blind" or without knowledge of the CSR or TI.)

3.   Old LSP responds to the CSR request.[7]

4.   New LSP and end user negotiate for services and features.

5.   New LSP issues LSR to Old NSP to release telephone number in NPAC by Due Date minus one.

6.   Old NSP sends confirmation to New LSP of LSR Due Date.

7.   New LSP issues LSR to New NSP to:

    a.   Establish bundled account.

    b.   Activate telephone number port on Due Date.

    c.   Establish Directory Listing(s).

8.   New NSP sends confirmation to the New LSP of LSR Due Date.

9.   Old NSP issues order to release telephone number in NPAC by Due Date minus one.

10.   New LSP arranges for connection of end user inside wire to DMARC/Network Interface Device (NID).

11.   New NSP:

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[7] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

a. Installs new facility to NID/DMARC.

b. Activates bundled service.

c. Activates telephone number port in NPAC.

d. Establishes new Directory Listing(s).

12. Old NSP unlocks E9-1-1 database when order completed.

13. New NSP locks E9-1-1 Database.

14. Old NSP removes old Loop facilities after Frame Due Time.

15. Old NSP sends Completion Notification to the New LSP.

16. New NSP sends Completion Notification to New LSP.

17. Old LSP issues LSR to DSP to remove Directory Listing(s) on the standalone UNE listing account, after port is completed.

Responsibilities by Carrier

New LSP   Obtains authority from end user.

Acquires current end user service information.

Negotiates for services and features with end user.

Issues LSR to Old NSP to release telephone number in NPAC.

Issues LSR to New NSP to establish the bundled account, activate the port in NPAC, and establish the Directory Listing(s).

Old LSP/Old NSP   Responds to CSR request.

Issues LSR to DSP to remove Directory Listing(s) on their standalone UNE listing account.

Sends confirmation to New LSP of LSR Due Date.

Issues order to release telephone number in NPAC by Due Date minus one.

Unlocks E9-1-1 database when order completed.

Removes old loop facilities after Frame Due Time (FDT)

Sends Completion Notification to the New LSP.

New NSP   Sends confirmation to the New LSP of the LSR Due Date.

Installs new facilities to the NID/DMARC

Activates telephone number port in NPAC during hot cut.

Locks E9-1-1 database.

Sends Completion Notice to the New LSP.

3B. UNE-L to Resale or CA UNE-P with LNP

Migrations   UNE-L to CA UNE-P with LNP
UNE-L to Resale

Description   This migration involves reusing the existing Loop facilities and retaining the end user's telephone number. It will require a reverse hot cut. The Old LSP serves the end user via its own Switch (NSP (Switch)) and leases an unbundled Loop facility from a NSP (Loop). The New LSP serves the end user via bundled services leased from a NSP.

Carriers   The Old NSP (Switch) is the Old LSP. The Old NSP (Loop) is the New NSP. The New NSP is the Directory Service Provider (DSP).

Process

1. New LSP obtains authority from end user to access CSR and/or CSI and to migrate the end user.

2. New LSP acquires current CSR and/or CSI using one of two methods:

    a. Contact Old LSP to request a CSR (Recommended).

    b. Contact end user ("Blind" or without knowledge of the CSR or TI).

3. Old LSP responds to the CSR request.[8]

4. New LSP and end user negotiate for services and features.

5. New LSP issues LSR to New NSP/Old NSP (Loop) to:

    a. Establish bundled account with the specified circuit ID to reuse Loop facility.

    b. Activate telephone number port on Due Date minus one.

    c. Establish Directory Listing(s).

6. New NSP sends confirmation to New LSP of LSR Due Date.

7. New LSP issues LSR to Old NSP (Switch) to:

    a. Release telephone number in NPAC by Due Date minus one.

    b. Advise of reuse of Loop facility.

8. Old NSP (Switch) sends confirmation to New LSP of LSR with Due Date.

9. Old NSP (Switch) issues order to release telephone number in NPAC by Due Date minus one.

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[8] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

10. New NSP:

    a.   Installs bundled account reusing existing loop facility at Frame Due Time

    b.   Activates telephone number port in NPAC at Frame Due Time.

    c.   Establishes new directory listings

11. Old NSP (Switch) unlocks E9-1-1 Database when order completed.

12. New NSP locks E9-1-1 Database.

13. Old NSP (Switch) sends Completion Notice to the New LSP.

14. New NSP sends Completion Notification to New LSP.

15. Old LSP issues LSR to DSP to remove old Directory Listing(s) on the standalone UNE listing account, after port is complete.

Responsibilities by Carrier

New LSP   Obtains authority from end user.

              Acquires current end user service information.

              Negotiates for services and features with end user.

              Issues LSR to the New NSP/Old NSP (Loop) to reuse Loop facilities for bundled service, port telephone number(s) and to establish Directory Listing(s).

              Issues LSR to Old NSP (Switch) to release the telephone number in NPAC by Due Date minus one and to advise of the reuse of the Loop facility.

Old LSP/Old NSP (Switch)

              Responds to CSR request.

              Issues LSR to DSP to remove Directory Listing(s) on their standalone UNE listing account, after the port is complete.

              Sends confirmation to New LSP of LSR Due Date.

              Issues order to release telephone number in NPAC by Due Date minus one.

              Unlocks E9-1-1 database when order completed.

              Sends Completion Notification to the New LSP.

New NSP/Old NSP (Loop)

              Sends confirmation to the New LSP of the LSR Due Date.

              Reuses loop facilities to activate bundled account (reverse hot cut).

              Activates telephone number port.

              Locks E9-1-1 database.

              Establishes new Directory Listing(s).

              Sends Completion Notice to the New LSP.

4. Unbundled to Unbundled

4A. UNE-L to UNE-L with LNP - Reuse of Loop Facilities

Migrations   UNE-L to UNE-L

Description   This migration involves reusing the existing Loop facility. The Old LSP serves the end user via its own switch (NSP (Switch)) and an unbundled Loop facility (NSP (Loop)) leased from a NSP. The New LSP serves the end user via its own switch (NSP (Switch)) and an unbundled Loop facility leased from a NSP (Loop). In addition, this migration requires a coordinated hot cut where the Loop must be disconnected from one company's cage/switch and connected to another company's cage/switch. The end user retains the telephone number.

Carriers   The Old NSP (Loop) is the New NSP (Loop)). The New LSP is the New NSP (Switch).

Process

1.   New LSP obtains authority from end user to access CSR and/or CSI and to migrate the end user.

2.   New LSP acquires current CSR and/or CSI using one of two methods:

    a.   Contact Old LSP to request a CSR (Recommended).

    b.   Contact end user ("Blind" or without knowledge of the CSR or TI).

3.   Old LSP responds to the CSR request.[9]

4.   New LSP and end user negotiate for services and features.

5.   New LSP issues LSR to New NSP (Loop)/Old NSP (Loop)/DSP to:

    a   Disconnect Old LSP Loop account and reuse the Loop facility.

    b.   Establish Directory Listing(s).

    Please note that coordination is required between the loop and portability orders and the delay of either one may require a supplemental order to be issued.

6.   New NSP (Loop)/Old NSP (Loop)/DSP sends confirmation to New LSP of LSR Due Date.

7.   New LSP issues LSR to Old NSP (Switch)/Old LSP to:

    a.   Release telephone number in NPAC by Due Date minus one.

    b.   Advise of reuse of Loop facilities.

8.   Old NSP (Switch)/Old LSP sends confirmation to New LSP of LSR Due Date.

9.   Old NSP (Switch) issues order to release the telephone number in NPAC by Due Date minus one.

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[9] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

10. New NSP (Loop)/Old NSP (Loop):

    a.   Transfers of Loop facility.

    b.   Establishes Directory Listing(s).

11. Old NSP (Switch) unlocks E9-1-1 database when order completed.

12. New NSP (Switch)/New LSP:

    a.   Activates telephone number port in NPAC.

    b.   Locks E9-1-1 database.

13. Old NSP (Switch) sends Completion Notice to the New LSP.

14. Old LSP issues LSR to DSP to remove old Directory Listing(s) on the standalone UNE listing account, after port is complete.

Responsibilities by Carrier

New LSP/New NSP (Switch)

    Obtains authority from end user.

    Acquires current end user service information.

    Negotiates for services and features with end user.

    Issues LSR to New NSP (Loop)/Old NSP/DSP to reuse Loop facilities, establish Directory Listing(s).

    Issues LSR to Old NSP (Switch)/Old LSP to release telephone number in NPAC by Due Date minus one and advise reuse of Loop facilities.

    Activates telephone number port in NPAC.

    Locks E9-1-1 database.

Old LSP/Old NSP (Switch)

    Responds to CSR request.

    Issues LSR to DSP to remove Directory Listing(s) on their standalone UNE listing account, after the port is complete.

    Sends confirmation to New LSP of LSR Due Date.

    Releases the telephone number in NPAC by Due Date minus one.

    Unlocks E9-1-1 database when order completed.

    Sends Completion Notification to the New LSP.

New NSP (Loop)/Old NSP (Loop)/DSP

    Sends confirmation to the New LSP of the LSR Due Date.

    Reuses loop facilities during hot cut.

    Establishes new Directory Listing(s).

4B. UNE-L to UNE-L with LNP - Loop Facilities Are Not Reused.

Migrations   UNE-L to UNE-L

Description   The Old LSP serves the end user via its own Switch (NSP (Switch)) and an unbundled Loop facility leased from a NSP (Loop). The New LSP serves the end user via its own Switch (NSP (Switch)) and a new unbundled Loop facility leased from a NSP (Loop). The end user retains the telephone number.

Carriers   The Old NSP (Loop) is the New NSP (Loop). The New LSP is the New NSP (Switch).

Process

1.   New LSP obtains authority from end user to access CSR and/or CSI and to migrate the end user.

2.   New LSP acquires current CSR and/or CSI using one of two methods:

   a.   Contact Old LSP to request a CSR (Recommended).

   b.   Contact end user ("Blind" or without knowledge of the CSR or TI).

3.   Old LSP responds to the CSR request.[10]

4.   New LSP and end user negotiate for services and features.

5.   New LSP issues LSR to Old LSP/Old NSP (Switch) to:

   a.   Release telephone number in NPAC by Due Date minus one.

   b.   Advise Loop facility will not be reused.

6.   Old LSP/Old NSP (Switch) sends confirmation to New LSP of LSR Due Date.

7.   New LSP issues LSR to New NSP (Loop)/Old NSP (Loop) to:

   a.   Establish new unbundled Loop facility.

   b.   Establish Directory Listing(s).

8.   New NSP (Loop)/Old NSP (Loop) sends confirmation to New LSP of LSR Due Date.

9.   Old NSP (Switch) issues order to release the telephone number in NPAC by Due Date minus one.

10. New LSP/New NSP (Switch) arranges for end user inside wire to be connected to the new Loop facility at the Network Interface Device (NID) or DMARC.

11. New NSP (Loop)/Old NSP (Loop) installs new Loop facility to NID/DMARC.

12. New LSP/New NSP (Switch) activates telephone number port in NPAC.

13. New NSP (Loop)/Old NSP/DSP establishes Directory Listing(s).

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[10] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

14. Old NSP (Switch) unlocks E9-1-1 database when order completed.

15. New LSP/New NSP (Switch) locks E9-1-1 database.

16. Old NSP (Switch) sends Completion Notice to the New LSP.

17. Old LSP issues LSR to DSP to remove old Directory Listing(s) on the standalone UNE listings account, after port is completed.

18. Old LSP issues LSR to Old NSP (Loop) to remove any unwanted Loop facility after port completed.

Responsibilities by Carrier

New LSP/New NSP (Switch)

Obtains authority from end user.

Acquires current end user service information.

Negotiates for services and features with end user.

Issues LSR to NSP (Loop)/DSP to establish new unbundled Loop facilities and to establish Directory Listing(s).

Issues LSR to Old NSP (Switch)/Old LSP to release telephone number in NPAC by Due Date minus one and to advise that the unbundled loop facility will not be reused.

Activates telephone number port in NPAC.

Locks E9-1-1 database.

Old LSP/Old NSP (Switch)

Responds to CSR request.

Sends confirmation to New LSP of LSR Due Date.

Releases the telephone number in NPAC by Due Date minus one.

Unlocks E9-1-1 database when order completed.

Issues LSR to DSP to remove old Directory Listings on the standalone UNE listings account, after port is completed.

Issues LSR to Old NSP (Loop) to remove unwanted Loop facility.

New NSP (Loop)/Old NSP (Loop)/DSP

Sends confirmation to the New LSP of the LSR Due Date.

Installs new Loop facility on NID/DMARC.

Establishes new Directory Listing(s).

4C. UNE-L to Facilities-Based Service with LNP

Migrations   UNE-L to Facilities-Based Service

Description   This migration does not involve the reuse of an existing Loop facility. The Old LSP serves the end user via its own Switch (NSP (Switch)) and an unbundled Loop facility leased from a NSP (Loop). The New LSP serves the end user via its own Switch and Loop facility (NSP). The end user retains the telephone number.

Carriers   The New LSP is the New NSP.

The Old NSP is the Directory Service Provider (DSP).

Process

1.   New LSP obtains authority from end user to access CSR and/or CSI and to migrate the end user.

2.   New LSP acquires current CSR and/or CSI using one of two methods:

    a.   Contact Old LSP to request a CSR (Recommended).

    b.   Contact end user ("Blind" or without knowledge of the CSR or TI).

3.   Old LSP responds to the CSR request.[11]

4.   New LSP and end user negotiate for services and features.

5.   New LSP issues LSR to Old LSP/Old NSP (Switch) to:

    a.   Release telephone number in NPAC by Due Date minus one.

    b.   Advise not reusing Loop facility.

6.   Old LSP/Old NSP (Switch) sends confirmation to New LSP of LSR Due Date.

7.   New LSP issues LSR to DSP to establish Directory Listing(s).

8.   DSP sends confirmation to New LSP of LSR Due Date.

9.   Old NSP (Switch) issues order to release telephone number in NPAC by Due Date minus one.

10. New NSP/New LSP:

    a.   Installs new Loop facilities to NID/DMARC.

    b.   Moves inside wiring to the New NSP NID/DMARC.

    c.   Activates telephone number port in NPAC.

11. Old NSP (Switch) unlocks E9-1-1 Database when order completed.

12. New NSP/New LSP locks E9-1-1 Database.

13. Old LSP sends LSR to Old NSP (Loop) to:

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[11] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

a.	Remove unwanted Loop facilities.

b.	Remove Directory Listing(s) from standalone UNE listing account.

14.	DSP establishes Directory Listing(s).

15.	Old NSP (Loop) sends confirmation to Old LSP of LSR Due Date.

16.	Old NSP (Loop) disconnects Loop facility.

17.	Old NSP (Switch) sends Completion Notice to the New LSP.

Responsibilities by Carrier

New LSP/New NSP	Obtains authority from end user.

Acquires current end user service information.

Negotiates for services and features with end user.

Issues LSR to Old LSP/Old NSP (Switch) for telephone number porting and to advise that unbundled loop facility will not be reused.

Issues LSR to DSP to establish new Directory Listing(s).

Installs Loop facility to NID/DMARC.

Moves inside wiring to New NSP NID/DMARC.

Activates telephone number port in NPAC.

Locks E9-1-1 database.

Old LSP/Old NSP (Switch)

Responds to CSR request.

Sends confirmation to New LSP of LSR Due Date.

Issues LSR to Old NSP (Loop) to remove unwanted loop facility and Directory Listing(s) on the standalone UNE listing account.

Releases telephone number in NPAC by Due Date minus one.

Disconnects bundled account.

Unlocks E9-1-1 database when order completed.

Sends Completion Notification to the New LSP.

Old NSP (Loop)	Sends confirmation to Old LSP of LSR Due Date.

Disconnects Loop facility.

4D. Facilities-Based Service to Facilities-Based Service with LNP

Migrations   Facilities-Based Service to Facilities-Based Service

Description   This migration involves a change from the facilities of one provider to the facilities of a new provider. The Old LSP serves the end user via its own switch and Loop facility (Old NSP). The New LSP serves the end user via its own switch and Loop facility (New NSP). The end user retains the telephone number. Directory listings are provided by the DSP.

Carriers   The Old LSP is the Old NSP. The New NSP is the New LSP.

Process

1.   New LSP obtains authority from end user to access CSR and/or and to migrate the end user.

2.   New LSP acquires current CSR and/or CSI using one of two methods:

    a.   Contact Old LSP to request a CSR (Recommended).

    b.   Contact end user ("Blind" or without knowledge of the CSR or TI)

3.   Old LSP responds to the CSR request.[12]

4.   New LSP and end user negotiate for services and features.

5.   New LSP issues LSR to Old LSP/Old NSP to release telephone number in NPAC by Due Date minus one.

6.   Old NSP/Old LSP sends confirmation to New LSP of LSR Due Date.

7.   New LSP issue LSR to DSP to establish Directory Listing(s).

8.   DSP sends confirmation to New LSP of LSR Due Date.

9.   Old LSP issue LSR to DSP to remove Directory Listing(s) on the standalone UNE listings account.

10.   DSP sends confirmation to Old LSP of Due Date.

11.   Old NSP/Old LSP issues order to release the telephone number in NPAC by Due Date minus one.

12.   New NSP/New LSP on Due Date:

    a.   Installs new Loop facility to NID/DMARC.

    b.   Moves inside wiring to New NSP NID/DMARC.

    c.   Activates telephone number port in NPAC.

13.   DSP removes Old Directory Listing(s).

14.   DSP establishes New Directory Listing(s).

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[12] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

15.   Old NSP/Old LSP unlocks E9-1-1 Database when order completed.

16.   New NSP/New LSP locks E9-1-1 Database.

17.   Old NSP/Old LSP removes old Loop facility and services after Frame Due Time.

18.   Old NSP/Old LSP sends Completion Notice to the New LSP.

Responsibilities by Carrier

New LSP/New NSP   Obtains authority from end user.

Acquires current end user service information.

Negotiates for services and features with end user.

Issues LSR to Old LSP/Old NSP to release telephone number in NPAC by Due Date minus 1.

Issues LSR to DSP to establish new Directory Listing(s).

Installs new Loop facility to NID/DMARC.

Moves inside wiring to new NID/DMARC.

Activates telephone number port in NPAC.

Locks E9-1-1 database.

Old LSP/Old NSP

Responds to CSR request.

Sends confirmation to New LSP of LSR Due Date.

Issues LSR to DSP to remove Directory Listing(s) on the standalone UNE listing account.

Releases telephone number in NPAC by Due Date minus one.

Unlocks E9-1-1 database when order completed.

Removes Loop facility and services after Frame Due Time.

Sends Completion Notification to the New LSP.

4E. Facilities-Based Service to UNE-L with LNP

Migrations   Facilities-Based Service to UNE-L.

Description   This migration moves the end user from the Loop facility of the CLEC to the Loop facility of the ILEC. The Old LSP serves the end user via its own switch and Loop facility Old NSP. The New LSP serves the end user via its own switch (New NSP (Switch)) and an unbundled Loop facility leased from a New NSP (Loop). The end user retains the telephone number. This migration requires coordination.

Carriers   The Old LSP is the Old NSP.

               The New LSP is the New NSP (Switch). The New NSP (Loop) is also the Directory Service Provider (DSP).

Process

1. New LSP obtains authority from end user to access CSR and/or CSI and to migrate the end user.

2. New LSP acquires current CSR and/or CSI using one of two methods:

   a. Contact Old LSP to request a CSR (Recommended).

   b. Contact end user ("Blind" or without knowledge of the CSR or TI).

3. Old LSP responds to the CSR request.[13]

4. New LSP and end user negotiate for services and features.

5. New LSP issues LSR to New NSP (Loop) to:

   a. Establish Loop facility.

   b. Establish Directory Listing(s).

6. New NSP (Loop) sends confirmation to New LSP of LSR Due Date.

7. New LSP issues LSR to Old NSP/Old LSP to release telephone number in NPAC by Due Date minus one.

8. Old LSP/Old NSP sends confirmation to New LSP of LSR Due Date.

9. Old NSP/Old LSP issues order to release the telephone number in NPAC by Due Date minus one.

10. New NSP (Loop):

    a. Installs Loop facility to NID/DMARC.

    b. Establishes Directory Listing(s).

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[13] In some cases, the Old NSP may provide the required information; however, this information may not convey the total picture of the end user's configuration.

11. New NSP (Switch)/New LSP:

    a.   Arranges for inside wiring to be connected to New NSP (Loop) DMARC/Network Interface Device (NID).

    b.   Activates telephone number port in NPAC.

12. Old NSP/Old LSP unlocks E9-1-1 database when order completed.

13. New NSP (Switch)/New LSP locks E9-1-1 database.

14. Old NSP/Old LSP removes old Loop facility after Frame Due Time.

15. Old LSP issues LSR to DSP to remove old Directory Listing(s) on a standalone UNE listing account, after port.

16. New NSP (Loop) sends completion notice.

17. Old NSP/Old LSP sends Completion Notice to the New LSP.

Responsibilities by Carrier

New LSP/New NSP (Switch)

Obtains authority from end user.

Acquires current end user service information.

Negotiates for services and features with end user.

Issues LSR to New NSP (Loop) to establish Loop facility and establish new Directory Listing(s).

Issues LSR to Old NSP/Old LSP to release telephone number in NPAC by Due Date minus one.

Arranges for inside wiring to be connected to the NID/DMARC.

Activates telephone number port in NPAC.

Locks E9-1-1 database.

Old LSP/Old NSP

Responds to CSR request.

Sends confirmation to New LSP of LSR Due Date.

Issues LSR to DSP to remove Directory Listing(s) on the standalone UNE listing account.

Releases telephone number in NPAC by Due Date minus one.

Unlocks E9-1-1 database when order completed.

Removes old Loop facility and services after Frame Due Time.

Sends Completion Notification to the New LSP.

New NSP (Loop)   Sends confirmation to New LSP of LSR Due Date.

Installs Loop facility to NID/DMARC.

Establishes Directory Listing(s).

Sends completion notice.

FCC/FTC Statement on Deceptive Advertising

The following is a summary of the Federal Communications Commission/Federal Trade Commission's joint statement on deceptive advertising as of June 2000. The full version of this statement (22 pages) is available at the following internet web site: http://www.fcc.gov/Bureaus/Enforcement/Orders/2000/fcc00072.txt

In recent years there has been an explosion in competition and innovation in the telecommunications industry. Long-distance customers have reaped substantial benefits in the form of greater choice in deciding which carrier to use and a greater diversity in the prices charged for those calls.

Numerous carriers, both large and small, promote their services through national television, print, and direct mail advertising campaigns. Because no one plan is right for everyone, advertising plays a critical role in informing consumers about the myriad choices in long-distance calling and, in the case of dial-around services, advertising is generally the only source of information consumers typically have before incurring charges. With accurate information, consumers benefit from being able to choose the particular carrier that meets their long-distance calling needs at the most economical price. However, if consumers are deceived by the advertising claims, they cannot make informed purchasing decisions and ultimately the growth of competition in the long-distance market will be stifled.

The proliferation of advertisements as well as an increase in the number of complaints regarding how these services are promoted, have raised questions about how the principles of truthful advertising apply in this dynamic marketplace.

Section 201(b) of the Communications Act requires that practices in connection with communications service shall be just and reasonable, and any practice that is unjust or unreasonable is unlawful. The FCC has found that unfair and deceptive marketing practices by common carriers constitute unjust and unreasonable practices.

This Policy Statement, based on the principles of truth in advertising developed by the FTC under the FTC Act, provides specific guidance for long distance advertising. Its essential elements are listed below.

1. Once an advertisement makes a claim, the advertiser is responsible for the truthfulness of the representation and for substantiating the representation, regardless of whether the advertiser intended to convey those messages to consumers.

2. In situations where an advertisement makes claims that are not directly false but might be misleading in the absence of qualifying or limiting information, advertisers are responsible both for making any necessary disclosures and for ensuring that they are clear and conspicuous.

3. Any significant conditions or limitations on the availability of the advertised rates should be clearly and conspicuously disclosed. Examples of such restrictions would include limitations on the time of day or day of the week that the rate applies or the fact that the rate is good only during a limited promotional or sale period.

4. The advertiser should clearly and conspicuously disclose whether the advertised service includes in-state calls, and the fact that such calls are charged at a higher rate, if such is the case. Many long-distance services and plans are limited to state-to-state calls. The disclosure of this information is particularly important because in-state long-distance rates are often substantially more expensive than state-to-state rates, a fact that may be surprising and significant to reasonable consumers.

5. Advertisers should also exercise care to adequately explain phrases such as "basic rates" in their ads. A telecommunications professional may understand the term "basic rate" to refer to a specific class of tariffed service, which may be billed at the most expensive rates. However, the typical consumer

would likely interpret the phrase differently. When making claims using such terms as "basic rates" or "regular rates," advertisers should be mindful that those terms will be evaluated from the point of view of the reasonable consumer, and may be deceptive.

6.   An advertiser must have a reasonable basis for any representations comparing the advertiser's price to the prices of its competitors. By representing a competitor's rates, an advertiser is making an implied claim that these rates are reasonably current.

7.   The fact that information about significant limitations or restrictions on advertised prices may be available by calling a toll-free number or a clicking on a Web site is generally insufficient to cure an otherwise deceptive price claim in advertising. Advertisers are encouraged to use customer service numbers and Internet sites to offer consumers more information, but these sources cannot cure misleading information in the ad itself.

8.   When the disclosure of qualifying information is necessary to prevent an ad from being deceptive, that information should be presented clearly and conspicuously so that it is actually noticed and understood by consumers.

Disclosures should be effectively communicated to consumers. A fine-print disclosure at the bottom of a print ad, a disclaimer buried in a body of text unrelated to the claim being qualified, a brief video superscript in a television ad, or a disclaimer that is easily missed on an Internet Web site is not likely to be effective. To ensure that disclosures are effective, advertisers should use clear and unambiguous language, avoid small type, place any qualifying information close to the claim being qualified, and avoid making inconsistent statements or using distracting elements that could undercut or contradict the disclosure. Factors used in determining whether a disclosure is clear and conspicuous are:

Prominence
        Disclosures that are large in size, are emphasized through a sharply contrasting color, and, in the case of television advertisements, remain visible and/or audible for a sufficiently long duration are likely to be more effective than those lacking such prominence. The FTC's experience consistently demonstrates that fine-print footnotes and brief video superscripts are often overlooked. The disclosure should also be prominent enough so that typical consumers will actually *read* and *understand* it in the context of an actual ad.

Proximity and Placement
        The effectiveness of disclosures is ordinarily enhanced by their proximity to the representation they qualify. Placement of qualifying information away from the triggering representation -- for example, in footnotes, in margins, or on a separate page of a multi-page promotion -- reduces the effectiveness of the disclosure. The use of an asterisk will generally be considered insufficient to draw a consumer's attention to a disclosure placed elsewhere in an ad.

Absence of Distracting Elements
        Even if a disclosure is large in size and long in duration, other elements of an advertisement may distract consumers so that they may fail to notice the disclosure. Advertisers should take care not to undercut the effectiveness of disclosures by placing them in competition with other arresting elements of the ad.

Factors Relating Specifically to Television Ads

Other considerations specific to television ads include volume, cadence, and placement of any audio disclosures. Disclosures generally are more effective when they are made in the same mode (visual or oral) in which the claim necessitating the disclosure is presented. Research suggests that disclosures that are made simultaneously in both visual and audio modes generally are more effectively communicated than disclosures made in either mode alone. In television ads, a disclosure that includes both a sufficiently large superscript and a voice-over statement is likely to be more effective than a superscript alone.

Customer Service Information Request Form

Page ___ of ___

All Field are REQUIRED unless marked with a *

ADMINISTRATIVE SECTION
To: Responding Company _____
Date & Time Request Sent _____
Transaction Number _____
Type of Service   [ ] Business   [ ] Residential

REQUESTING COMPANY INFORMATION
From: Requesting Company _____
Initiator Name _____
Telephone Number _____
Mailing Address _____
Fax Number _____
*E-mail _____
Preferred Response Means   ( ) Fax   ( ) Email
Responding company to notify requesting company if preferred means will not be used.
Faxed requests and responses must be accepted.

CUSTOMER INFORMATION
Billing Telephone Number _____
*Account Number _____
Name _____
Service Address _____
City, State _____
End User Authorization Obtained?   [ ] Yes   [ ] No
Provide Circuit ID if Circuit is reusable   [ ] Yes   [ ] No

RESPONSE REASONS AND CODES
*Response Reason _____
*Response ID Number _____
Response Codes
001   Account telephone number and/or customer location not found
018   Supplied account information does not match active customer account
052   Account exceeds maximum page or fax limit (20 pages); response to be mailed in 24 hours
501   Required requesting company contact information incomplete; required fields blank or end-user
*   authorization not obtained*

REMARKS

_____
_____
_____

Customer Service Record Response

Page ___ of ___

*All Field are REQUIRED unless marked with a ***

ADMINISTRATIVE SECTION
To: Requesting Company _____
Attention _____
*Response Identifier _____
Requesting LSPs
Transaction Number _____
Service Provider ID _____

CSR DATA ELEMENTS SECTION
Billing Telephone Number _____
Type of Service   [ ] Business   [ ] Residential
Billing Name _____
Billing Address
Business or Residence Name
 (If different than Billing Name) _____
Service Address
 (If different than Billing Address) _____

LINE INFORMATION *Provide information for each working telephone number on account*

Account Features in USOC with English Description (Example: Hunting, Inside Wiring, etc.)	
Working Telephone Numbers (including BTN) with Vertical Features (Example: Custom Calling, Voice Mail, Remote Call Forwarding, etc.)	
Current PICs	
Freezes on account (PIC, Resale, Local Service, etc.)	
Options (Example: 900 Blocking; Toll Blocking, etc.)	
Service Configuration (Indicate One)	**[ ] Resale** **[ ] Unbundled Local Switching** **[ ] Commercial Alternative to UNE-Platform** **[ ] UNE-Loop** **[ ] Facilities-Based**
Circuit ID[14]	
Directory Listing Information	
Line Sharing/Line Splitting?	**[ ] Yes [ ] No**

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[14] Provision of circuit ID information confers permission for the re-use of that circuit by the new provider.

Appendix D

Workshop Participants

Verizon Maine
Conversent Communications
Cornerstone Communications
Biddeford Internet Corporation, d/b/a GWI
Pine Tree Communications
Oxford Networks
Axiom
MPUC