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**Computer & Communications Industry Association**

Wednesday, May 15 2008

The Honorable Kevin J. Martin, Chairman  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20054

Re: Telephone Number Portability  
WC Docket No. 07-244. CC Docket NO. 95-116

Dear Chairman Martin:

We urge the Commission to take prompt action in its pending rulemaking to expedite wireline to wireless intermodal porting of numbers. Twelve years ago, Congress had the foresight to realize that the ability of consumers to keep their telephone numbers when they switch to new providers was essential to the development of local exchange competition. The Commission implemented that congressional mandate and, given the importance of local number portability to consumers and to the functioning of a competitive market, it subsequently extended the requirement to the wireless industry.

Congress's and the Commission's purpose in mandating number portability was to ensure that consumers could retain their telephone numbers without suffering inconvenience or delay in service when changing from one providers to another. Regrettably, however, wireline carriers are nowhere near attaining this reasonable goal – consumers trying to switch from incumbent local exchange carriers to wireless or other competitive providers regularly have to wait a week or more if they want to take their phone numbers with them. This is in sharp contrast to the timeframe for wireless-wireless porting, which often is accomplished before the new customer even leaves the wireless provider's store.

The industry-established (and FCC-adopted) four business day wireline porting interval, which has been in place for more than a decade, discourages consumers from freely changing providers and therefore inhibits competition. While we appreciate the Commission's recent decision to limit the information required to be exchanged between porting carriers for port validation purposes, we urge the Commission to accelerate elimination of this barrier to competition as soon as possible by significantly shortening the porting interval for all wireline and intermodal ports.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Black". The signature is fluid and cursive, with a large initial "E" and "B".

Ed Black  
President & CEO  
CCIA

cc: Honorable Michael J. Copps, Commissioner  
Honorable Jonathan S. Adelstein, Commissioner  
Honorable Deborah Taylor Tate, Commissioner  
Honorable Robert M. McDowell, Commissioner