**Comment/Response to Document in Review**

|  |  |
| --- | --- |
| **Announcement Date:** | **October 5, 2023** |
| **Effective Date:** | **November 6, 2023** |
| **Notification Number:** | **CMPR.CTLL.10.05.23.F.20738.LNP\_Workback\_Process\_Chg** |
| **Notification Category:** | CMP; Website |
| **Target Audience:** | **CLEC-Q; Resale-Q** |
| **Subject:** | **LNP Workback Process Change - PCAT Documentation Update** |
| **Disposition Level** | **3** |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Lumen recently posted updates regarding the LNP Workback Process Change.CLECs were invited to provide comments during a Document Review period from October 5, 2023 through October 20, 2023. The information listed below is Lumen’s response to CLEC comments provided during the review/comment cycle.Document Review Site: <http://www.centurylink.com/wholesale/cmp/review.html>If you have any questions on this subject or there are further details required, please contact Lumen’s Change Management Manager at cmpcomm@centurylink.com.CenturyLink’s Response to Comments on: LNP Workback Process Change - PCAT Documentation Update

|  |  |  |
| --- | --- | --- |
| **#** | **CLEC Comment** | **Lumen Response** |
| 1 | **CLEC: Zayo****Date: 10/5/23**The proposed change requires the end user to initiate retail account restoration with Lumen when the end user is out of service due to porting activity.  The PCAT as proposed is too broad and does not reflect the Best Practices of the U.S. [Number Portability Industry Form (NPIF)](https://urldefense.com/v3/__https%3A/workinggroup.numberportability.com/__;!!CdLFVIQ!VtLrcTWjNLM9Pza4gBzfdQrN5nvBN8ifuoaZPhEFur9iBgj1V7fCuMUS9UxfLPoZHq_E0XzEersjNj_Nv0tiZA$). The ICAs between Lumen Qwest and the CLECs indicated that the parties will follow NPIF (formerly LNPA) Porting Best Practices. Zayo is requesting that Lumen retract this notice and then consult with Phil Linse Lumen's representative in the NPIF.  An end user out of service event when there is a pending or completed port has multiple causes, which may include Disputed Ports, Inadvertent Ports or Fraudulent Ports.  The NPIF has multiple Best Practices that address this issue, see NPIF  [Best Practice 073 Unauthorized Ports](https://urldefense.com/v3/__https%3A/workinggroup.numberportability.com/sites/workinggroup/files/2022-12/BP%2A20073%2A20-%2A20Unauthorized%2A20Port%2A20Flow%2A20v3%2A20%2A281%2A29.docx__;JSUlJSUlJSUl!!CdLFVIQ!VtLrcTWjNLM9Pza4gBzfdQrN5nvBN8ifuoaZPhEFur9iBgj1V7fCuMUS9UxfLPoZHq_E0XzEersjNj9H6FuhYA$) . The NPIF has purposely designed this Best Practice to:* Protect the end user from harm
* Get the end user service restored as quickly as possible
* Not burdened the end user, to the extent possible, by keeping the restoration of the end users service between the Old and New Service Providers.

The NPIF sees these Best Practices to be in the best interest of the industry because they are in the best interest of the end users | 10/6/23We have changed the verbiage as follows:If the end-user is Out of Service (OOS) is due to a CLEC failed port, and the DD on the service request is past and you desire restoration of the CenturyLink service, you must contact your customer and have them contact CenturyLink to restore the service. ~~the CSIE and open an escalation ticket to begin the ”Workback” (WB) process.~~ CenturyLink otherwise follows industry best practices. |
| 2 | **Zayo****10/6/23**Could you define what a CLEC failed port means to Lumen? Lumen is not supposed to remove translations until it sees the numbers have been ported so there would be no out of service condition if the CLEC didn't activate the port subscription.  Is Lumen's definition of CLEC failed port - A port subscription that is activated by the CLECs but the CLEC cannot get the end users service to work due solely to a CLEC caused issue.   Zayo/Allstream has experienced issues with Lumen not completing the porting process and not responding to requests to troubleshoot end user service impacting issues. I want to make certain that Lumen understands that it is obligated to work with the New Service Provider to troubleshoot and resolve any issues Lumen is causing prior to making the end user customer re-establish a retail account.  See [Best Practice 075](https://urldefense.com/v3/__https%3A/workinggroup.numberportability.com/sites/workinggroup/files/2022-09/BP_075_-_Response_Interval_Guidelines_for_End_User_Issues_after_Port_Activation.docx__;!!CdLFVIQ!Tg5HnCIEiPWgjeFQFkmUP2l2bQ0j9oMa34ZAg4LA6QOcKR7wP1OU_n_Uno69qg1BwI8QE7bfLI3S9a6w2-PBsg$)As the LNP process becomes more automated, parties might not be aware that ports may have dropped from automated LNP provisioning processes which result in end user service impacting issues. This best practice is intended to provide guidelines to service providers and to set expectations for response times.  If an NLSP/NNSP or an ONSP reports that an end user customer is experiencing issues related to a number port activation (e.g. dial tone but is unable to receive calls due to an incomplete 10 digit trigger or other incomplete LNP task), the parties will review the status of their LNP Provisioning tasks (e.g. removing translations) in an expedited manner and with the appropriate level of urgency that will allow the task completion as quickly as possible. While there is no mandated timeline associated with resolving end user customer issues related to number porting, these issues typically can be resolved within a four (4) – eight (8) business hour window.If a NNSP activates a port during non-business days or holidays, the ordering NNSP should be aware that there may not be any support from ONSP provisioning group. Where possible, the NNSP should be able to address the incomplete LNP Provisioning with the ONSP trouble reporting centers. | CLEC failed port definition:* When CLEC does not meet the requested port date and supp is not received.
* When CLEC directs Lumen to hard disco in switch and CLEC fails to complete port.

CLEC are expected to actively work with Lumen to complete porting activity.   If the CLEC does not expect its port request to meet the requested due date, it is the CLEC’s responsibility to supp the DD on the order and establish a new date.  If a supp is not received and as a result the end user goes out of service and the CLEC desires restoration of the Lumen service on behalf of the CLEC customer, the CLEC must contact its customer and have them contact Lumen to have service reactivated.  This process is consistent with Industry best practices and specifically best practice 75. |
| 3 | I agree Lumen and the CLEC are expected to work together.  The reason I'm hounding this issue is that we have had incidents where Lumen has taken the customer out of its switches prior to the new provider activating the port subscription.  This results in a customer outage that is Lumen's responsibility.  We experienced Lumen instructing the end user customer to reestablish their retail account to get their service back up.  If the error is Lumen's, fixing the issues is Lumen's and the end user should not have to do anything (including re-establishing an Lumen account.)  Due to the past experiences, we need the PCAT to be very clear that if the service outage is due to Lumen taking the number out of its switch before the port completes in the NPAC, Lumen is responsible for correcting the error as quickly as possible.  So I do need to rebut the your statement - CLECs are expected to actively work with Lumen to complete porting activity.   If the CLEC does not expect its port request to meet the requested due date, it is the CLEC’s responsibility to supp the DD on the order and establish a new date.  If a supp is not received **[should say: by 9:00 PM Local time on the due date. If Lumen is removing translations using option (3) in the below LNP Flow Step 9]** and as a result the end user goes out of service and the CLEC desires restoration of the Lumen service on behalf of the CLEC customer, the CLEC must contact its customer and have them contact Lumen to have service reactivated.  This process is consistent with Industry best practices and specifically best practice 75. | We will concur with your suggestions on this paragraph with just a few minor changes:If the end-user is Out of Service (OOS) because the CLEC did not activate the port subscription in the NPAC; and the CLEC did not submit a supplement prior to industry agreed to time of day (e.g., 9:00 PM) on the due date; and the confirmed due date on the service request is past; and you desire restoration of the CenturyLink service, you must contact the end user customer and advise them to contact the CenturyLink Business Center to restore the CenturyLink retail service.  CenturyLink otherwise follows industry best practices |

 |  |