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PUBLIC SERVICE COMMISSION

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April 13, 2009

The Honorable Michael J. Copps, Acting Chairman  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**RE: Written Ex Parte Communications concerning the Time Frame for Simple Ports between Carriers raised in the proceedings captioned: *Telephone Number Portability, CC Docket No. 95-116; Numbering Resource Optimization, CC Docket 99-200; Local Number Portability, WC Docket No. 07-244.***

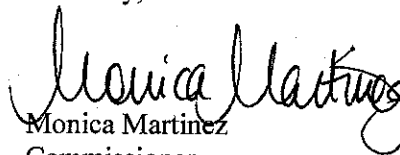
Dear Acting Chairman Copps,

As a state commissioner, I am aware that local number portability (LNP) has become a cornerstone of competition in telecommunications by providing customers with the ability to change their service provider without changing their telephone number. During the last twelve years, procedures have been adopted to provide cost recovery, LNP between wireline, wireless, and Voice over Internet Protocol (VoIP) providers, and to ensure a porting customer is able dial 9-1-1 throughout the porting process. The current LNP completion time of four days, for simple ports involving an account for a single line, is obsolete and needs to be immediately addressed.

Although the four day LNP process for wireline carriers was viewed as timely in 1997, advancements in telecommunications technology, and an increase in consumer desire to change their provider, makes it critical that this lengthy process be updated to a one-day porting interval for simple ports. When LNP began, many requests were sent by fax machines from one carrier to another; however, this process has changed dramatically, with carrier requests now performed electronically with the need for additional information determined instantaneously.

The National Association of Regulatory Utility Commissioners (NARUC) endorsed a one-day porting interval for most simple ports between carriers in a November 2007 resolution and in comments filed before the Commission in March 2008. As a member of NARUC, I support the resolution and urge the FCC to act promptly to adopt a one-day porting process for simple ports.

Sincerely,

  
Monica Martinez  
Commissioner

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