

**Bob Williamson/WUTC**

06/15/2005 08:22 AM

To  
lopez@puc.state.nv.us, Tom Wilson/WUTC@WUTC  
cc  
bwilliam@wutc.wa.gov  
Subject  
Re: Fw: VoIP & Number Portability

Manny,

Yes we have had a number of VoIP companies request LNP and also refusals to port based on the VoIP company being an information service provider. We were able to get the VoIP providers CLEC partner to request the port in one case. Below I've copied part of a discussion with Centurytel about just such an issue. You are not alone there are a number of states seeing the same issue. Unofficially I would say that number porting should never be done to a company that is not capable of porting out since the number would then be lost. There are technical solutions that can be used by VoIP providers and Vonage is working with a company to trial just such a system.

Hope this helps. Feel free to call me or follow-up with email if I can be of any help.

Bob Williamson  
Senior Member Technical Staff  
WUTC  
Olympia, WA.  
360-664-1288 office  
253-227-0279 mobile  
bwilliam Skype

Bob:

Per your request: Please see attachment.

Attached is a sampling of Federal law and Orders that show LNP obligations are between certificated local exchange carriers only (this term includes wireless).

Re the specific question below, CTL cannot speak to the relationship between a VOIP provider and a CLEC although as described it appears no more than that of a LEC and an end user customer. (Large end user customers obtain number blocks from a LEC for Centrex, PBXs, hotels, shared tenant, etc.) If a certificated CLEC places an order to port to its LRN pursuant to an in-place agreement, we would accept and process the order. If a non-

certificated VOIP provider contacts us directly, we cannot accept any order since that entity is only operating as an end user business. not as a local exchange carrier.

In 2004, the staff of the Wisconsin commission agreed in a similar complaint that VOIP provider who was hiding behind a CLEC was not entitled to any 251 obligations from the ILEC. This came in a direct call to CenturyTel from a staff person and because the PSC denied the complaint, we have no written reference to offer.

Thanks,

Trey



CERTIFICATED LOCAL EXCHANGE CARRIER LNP.doc

**Tom Wilson/WUTC**

06/14/2005 01:28 PM

To  
Bob Williamson/WUTC@WUTC  
cc

Subject  
Fw: VoIP & Number Portability

would you be able/willing to help?

----- Forwarded by Tom Wilson/WUTC on 06/14/2005 01:26 PM -----

**"Manny Lopez" <lopez@puc.state.nv.us>**

06/14/2005 10:14 AM

To  
"Tom Wilson" <twilson@wutc.wa.gov>  
cc

Subject  
VoIP & Number Portability

Tom,

It's Manny again from the Nevada PUC. I'm hoping to gain some more of your insight and to also thank you for your help regarding the business line reclassification as competitive. We finally made it through. Yet, as I'm sure you are more than aware of, the ball keeps rolling.

I've been asked to do a little research on VoIP & LNP. It appears one of our LECs has received a request and has denied LNP for a VoIP provider (since they are an information service provider and not a telecommunication service provider). I was wondering if Washington has received any requests and how has the Commission/Staff handled it. Your insight would be greatly appreciated.

Manny