

CONNECTICUT MASS MIGRATION GUIDELINES

These guidelines are to be used when a competitive local exchange company (CLEC) is exiting the local exchange services market, or a portion of its market, and has a significant customer base. Every attempt should be made to provide sufficient notice in order for the customer base to be migrated to other service providers utilizing business as usual practices. In some cases there may be situations that require special migration procedures to accommodate a large number of service orders over a short period of time. Specifically, CLECs will need to follow the processes outlined in these guidelines.

I. OBJECTIVE

To ensure that the customers of a CLEC that discontinues local exchange services have the opportunity to migrate to another local exchange carrier (LEC) with minimal interruption of service, utilizing business as usual practices.

II. GENERAL PRINCIPLES

The goals of these mass migration guidelines are to:

1. Ensure that customers are informed of their choices and are provided ample opportunity to secure alternative service arrangements prior to interruption of service.
2. Maintain the ability of regulators and underlying network providers to monitor events and assist parties if needed;
3. Avoid double migrations whenever possible;¹
4. Ensure that customers are provided ample notification to allow the customer to select the LEC of their choice;
5. Comply with federal and state laws and regulations;
6. Coordinate information flow and activities through a project management team;
7. Ensure that the exiting CLEC provides sufficient network information for the acquiring LEC to migrate its customers seamlessly.

III. REGULATORY NOTIFICATION

The Federal Communications Commission (FCC) and the Department of Public Utility Control (Department) require notification from any company that will no

¹ Double migrations are generally the product of timing constraints where the customer is migrated to an acquiring carrier, and then to the carrier of the customer's choice.

longer be serving customers in a particular market. In addition, the company must file supplements to either cancel or modify its tariffs as well as plans for transferring customers and for preventing slamming problems. Further, the company is required to notify the Department 90 business days in advance of discontinuing service or, upon a showing that 90 business days' notice is not feasible, at the earliest possible date.

CLEC exit plans filed with the Department must include:

- A sample of the letter to be sent to its customers;
- A proposed final termination date;
- A cutoff date by which customers must select an alternative local service provider;
- A contact number for the exiting CLEC's cutover coordinator;
- Any arrangements made with an acquiring LEC;
- Steps to be taken with the number code and/ or pooling administrator to transfer NXXs or thousand number blocks (if applicable) while pursuing number portability for numbers within the code/blocks;
- The current customer serving arrangements (e.g., Unbundled Network Elements-Platform (UNE-P), resale, Unbundled Network Elements-leased (UNE-L) or Full Facilities;
- The number of customers affected;
- Any transfer of assets/ debts;
- Plans to modify/cancel tariff(s);
- Notification to the Department if there are changes to the cutover plan as filed;
- Plans for unlocking the E911 database.

At least sixty days prior to the projected transfer date a customer list should be submitted to the Department. Staff will assess the nature of the customers being transferred and track the progress of the transfer. Specifically, Staff will determine the size of the customer base and identify health and safety related customers. Additionally, Staff will contact customers to determine if problems are being encountered. Recognizing the privacy concerns associated with submitting a customer list, Staff will treat the customer list as confidential, and, further, will not be shared with any other LEC without the exiting CLEC's permission.

The customer list should include: customer name, telephone number(s), address, class of service, and type of serving arrangements (UNE-P, resale etc.). To the extent possible, customer lists should also include an identification of "priority" or "essential" customers. For purposes of the Connecticut Guidelines, "priority/essential" customers will be defined as any: hospital, ambulance, police, fire, national security, and civil defense organizations, or any customer who has obtained Telecommunications Service Priority (TSP) authorization from the

government. Also, to the extent possible, customer lists should also identify any “at risk” customers whose particular serving arrangements may create transfer problems.

Additionally, the exiting CLEC must make available the customer service record (“CSR”) information to enable the acquiring LEC(s) to migrate its customers seamlessly. Staff may request CSR information for “at risk” customers. Specifically, the information required to migrate a customer is:

1. Type of service (UNE-P, etc.);
2. Class of service;
3. Customer billing name and address;
4. Customer directory listings including stand alone listings if applicable;
5. Customer service address;
6. Billing telephone number, associated telephone numbers; and any associated vertical features
7. If applicable - circuit Ids.

IV. INDUSTRY NOTIFICATION

This step is important because it will help manage the migration process. Specifically, LECs should be aware that there must be a coordinated process in migrating customers when a LEC is acquiring an exiting CLEC’s entire or partial customer base. However, during the period of transition, customers may elect to migrate their local service to another LEC. The underlying network provider will process these orders as they do today in its normal course of doing business as orders are received.

An exiting CLEC must notify the Department and the underlying network provider at least 90 business days before their planned exit, whether its customer base is being acquired by another LEC or when customers must select their own alternative local service provider. Upon notification from the exiting CLEC, the Department will:

1. Post the exiting CLEC notice on the CLEC migration web site, including if an acquiring LEC will assume the customer base and
2. Notify the LEC contact list with information regarding any CLECs exiting the market when there is no acquiring LEC. Please note that although the Department maintains this list, there is no obligation on its part to ensure its accuracy or update status.

V. CUSTOMER NOTIFICATION

CLECs exiting the local service market must follow the guidelines and meet the following timelines in order to ensure enough time to migrate customers:

- The exiting CLEC must notify the Department and its underlying network provider in writing of its plans at least 90 business days prior to discontinuing service. (Note that the information required by the Department is listed in Section III.);
- The exiting CLEC must notify its customers 60 business days in advance of discontinuing service;
- Exiting CLEC must send a second notification to its customers by letter 30 business days in advance of discontinuing service. If there is an acquiring LEC, the acquiring LEC must notify customer's 30 business days in advance of the exit date that the customer will be transferred.
- If there is no acquiring LEC and customers have not yet migrated to another LEC 15 business days prior to discontinuing service, the exiting CLEC must send a final notice, via certified letter, advising the customer of the disconnection date.

If a CLEC is unable to meet one or more of these deadline(s), it must demonstrate to the Department that meeting the deadlines is not feasible, and it must provide the appropriate notices as soon as feasible. If this occurs, the date of disconnect may vary in order to provide ample time to notify customers and complete provisioning work.

Attached to these guidelines are sample letters illustrating the information that must be included in the letter being sent by the exiting CLEC when notifying the customer of discontinuing service. Letter 1 represents the information that the exiting CLEC must send to the customer when there is an acquiring LEC. Letter 2 represents the information that the exiting CLEC must send to the customer when there is not an acquiring LEC. Mass migrations involving an acquiring LEC must identify a transfer date. This transfer date will ensure that the customer has time to make a decision and that the acquiring LEC has the time to send out notification information concerning the scheduled migration, while providing sufficient time for the underlying network provider to process and provision service requests from the acquiring LEC. The transfer date will depend on the size of the migration and the notification timeliness, but the customer must be informed via certified mail of the final transfer date. The exiting CLEC must send a certified letter to all remaining customers advising them that they will lose service within 5 business days if they do not select an alternative provider.

If an exiting CLEC fails to provide any of the notifications called for by these Guidelines, the Department may call the surety bond that the CLEC was required to provide pursuant to the Department's Decision in Docket 01-12-10 and use the funds provided by the bond to send the appropriate notice to the customer of the exiting customer.

VI. PROGRESS REPORTS

The exiting CLEC must track the progress of the migrations and provide the Department and its underlying carrier with progress reports. The frequency of the updates will vary with the magnitude of the mass migration cut-over as well as customer risk factors.

When processing orders for migrations, it should be emphasized that all parties need to be flexible. In this regard, there will be circumstances where the framework outlined in this project management section will need to be modified to accommodate unique circumstances. This framework is not intended to preclude parties from negotiating special procedures aimed at facilitating customer service.

VII. MASS MIGRATION PROCESS

There are two scenarios that require the migration of customers from an exiting CLEC to another LEC;

1. Migrations resulting from an exiting CLEC's withdrawal, which includes a prearranged agreement with a LEC to acquire the exiting CLECs customer base, and
- (2) Migration resulting from an exiting CLEC's withdrawal without a prearranged agreement with an acquiring CLEC.

Each scenario requires a different coordination method and timelines as described below. When processing orders for migrations, it should be emphasized that all parties need to be flexible. There may be circumstances where the framework outlined below will need to be modified to accommodate unique circumstances. This framework is not intended to preclude parties from negotiating special procedures aimed at facilitating customer service. However, the parties must notify the Department of any modifications.

A. Coordination Requirements

Regardless of the scenario, the exiting CLEC shall designate a program manager responsible for managing customer migrations and coordinating the overall migration of its customers to an acquiring LEC, the underlying network provider and if applicable, the Department. In addition, each of the parties involved in the migration must have a project manager who works with the exiting CLEC's migration program manager.

B. Customer Information

In order for the acquiring LEC(s) to migrate its customers seamlessly, the exiting CLEC must provide sufficient network information to the acquiring LEC. This information is necessary to allow the acquiring LEC to submit proper Local Service Requests (LSRs) to the appropriate underlying network provider. In compliance with industry guidelines, an exiting CLEC must provide the acquiring LEC with a copy of the CSR regardless of the method by which the customer is served (e.g., resale or UNE-L). In addition, for customers served by UNE-L or full facilities-based service, the exiting CLEC must provide to the acquiring LEC, the applicable circuit IDs and associated telephone numbers, whether the customer's number is ported and the name of the porting company, as well as billing names, addresses and service addresses. For UNE-P or resale arrangements, in addition to the CSR, the exiting CLEC must provide the acquiring LEC a billing name, billing address, bill telephone number and all associated working telephone number(s). Such CSR information must be provided to the acquiring LEC within 48 hours of the request.

C. Order Processing

In accordance with the FCC rules, existing preferred carrier freezes on the lines involved in the transfer will be lifted, therefore subscribers must contact their local service providers to arrange a new freeze.² The exiting CLEC must also request that the underlying network provider remove the freeze. In addition, the acquiring carrier will be responsible for any carrier change charges associated with the transfer; however, when there is no acquiring carrier, the customer is responsible for the charges.³

When processing orders for migrations, it should be emphasized that all parties need to be flexible. There may be circumstances where the framework outlined in this section will need to be modified to accommodate unique circumstances. This framework is not intended to preclude parties from negotiating special procedures aimed at facilitating customer service. However, the parties must notify the Department of any modifications or special procedures.

When there is an acquiring LEC assuming the exiting CLEC's customer base, the mass migration will be treated as a project. The details pertaining to the transfer schedule will be determined by the exiting CLEC, the acquiring LEC and the underlying network provider. The method of service provisioning will determine the time frames for exiting the market and for completion of service. The acquiring LEC is responsible for all charges associated with the transfer of these customers.

When there is no acquiring LEC assuming the base of customers, customers will be transferred in the normal course of business. The exiting CLEC must ensure

¹ First Report and Order in CC Docket No. 00-257 and Fourth Report and Order in CC Docket No. 94-129 released May 15, 2001; p. 28.

² *Id.* § 64.1120.

that all customer information is shared with an acquiring LEC in a timely manner in order to facilitate the processing of the LSRs to the underlying network provider.

D. OVERALL PROCESS REQUIREMENTS AND RECOMMENDED TIMELINES

1. The process requirements and recommended timelines when there is a prearranged agreement with an acquiring LEC are summarized below.

Day	Milestone
90	▪ Exiting CLEC informs Department and underlying network provider in writing of plans to exit market. (See Section III) ▪ Department to post information regarding the CLEC exiting the market on its website. (See Section IV). ▪ Department to inform industry LEC contacts regarding the CLEC exiting the market. (See Section IV). ▪ Exiting CLEC to begin process to transfer its NXX codes in accordance with proper industry procedures, if applicable. (See Section IX). ▪ Exiting CLEC assigns migration program manager to contact underlying network provider. (See Section VI.A.). ▪ Exiting CLEC notifies Department if there is an acquiring LEC and provides copy of authorization to Department and underlying network provider. (See Section III).
80	▪ Exiting CLEC provides customer information as necessary to parties. (See Section VI.B.). ▪ Acquiring LEC and underlying network provider assign project managers.
70	▪ Parties develop a transfer schedule for implementing customer migrations. Implementation plan will identify when acquiring LEC must begin to issue LSRs. Timeline will depend on the type of facilities utilized by the exiting CLEC and acquiring LEC. (See Section VI.C.). ▪ Exiting CLEC provides copy of implementation schedule to Department including estimate of completion date.
60	▪ Exiting CLEC notifies its customers that it is exiting the market. Informs them that if they do not select another local service provider within 45 days, they will be transferred to the acquiring LEC and may then select another carrier after the transfer is completed.
30	▪ Acquiring LEC notifies customers of their status, informing them that arrangements have been made to migrate them to a specific LEC by the

	transfer date. Remind the customer again they can change provider, if they wish, before the transfer date. ▪ Exiting CLEC notifies remaining customers that service will be discontinued if the customer does not act within the next 15 business days. ▪ Discrepancies on customer list identified and addressed by parties.
0	▪ Target exit date. All scheduled orders worked.

2. The process requirements and recommended timelines when there is no prearranged agreement with an acquiring LEC to migrate the customer base are summarized below.

Day	Milestone
90	▪ Exiting CLEC informs Department and underlying network provider in writing of plans to exit market. (See Section III). ▪ Department to post information regarding the CLEC exiting the market on its website. (See Section IV). ▪ Department to inform industry LEC contacts regarding the CLEC exiting the market. (See Section IV). ▪ Exiting CLEC to begin process to transfer its NXX codes in accordance with proper industry procedures. (See Section VII). ▪ Exiting CLEC notifies the Department and the underlying network provider that there is no acquiring LEC. (See Section III).
80	▪ Exiting CLEC begins to provide CSR information to LECs acquiring customers upon request in compliance with industry standards. ▪ Any LEC acquiring a customer submits LSRs to the underlying network provider. LSRs are processed on the standard intervals. ▪ Underlying network provider assigns project manager. (See Section VI.A.).
60	▪ Exiting CLEC notifies its customers that it is exiting the market. Informs them that they must select another carrier within 45 business days or they will lose their local phone service. (See Section V)
40	▪ Discrepancies on customer list are identified and addressed by the parties.
30	▪ Exiting CLEC via certified letter notifies customers who have not yet selected another service provider that they must select another carrier within 15 business days or they will lose their local phone service on the target date. (See Section V).
15	▪ Exiting CLEC provides list of remaining customers to Department and underlying network provider. (See Section VI.C) ▪ Exiting CLEC via certified letter notifies customers who have not yet selected another service provider that they must select another carrier within 10 business days or they will lose their local phone service on the target date.

0	Target exit date. All scheduled orders worked. When there is no acquiring LEC, exiting CLECs are authorized to terminate end user service on the target date. (See Section VIII).

VIII. NXX CODE TRANSFERS

If the exiting CLEC has any NXX codes or thousand number blocks assigned, it must make transfer arrangements with the code administrator at least 66 days prior to the migration. If arrangements are not made, calls may not be completed. For specific information, refer to the Central Office Code (NXX) Assignment Guidelines and Thousand Block (NXX-X) Pooling Administration Guidelines developed by the Industry Numbering Committee. In addition, care must be taken to ensure that all number porting is complete before a code is disconnected.

IX. TERMINATION ACTIONS WHEN NORMAL MIGRATION PROCEDURES HAVE FAILED

An exiting CLEC must notify the customer by certified mail that the customer will lose its local service if the customer does not select an alternative local service provider within 10 business days. The customer should be informed that if the customer elects to wait until the last day, there is no guarantee that the customer will be able to retain the service or the telephone number.

X. E-911

CLECs discontinuing service must care for its E911 records before discontinuing service. Specifically, the CLECs must unlock and update all TN records in the appropriate E911 databases to allow its customers to be properly transitioned to a new carrier. Those companies exiting the Connecticut market shall be responsible for all costs associated with unlocking and updating the E911 database. This E911 unlock procedure is in accordance with the National Emergency Numbering Association's standards for Local Number Portability, to which all carriers must adhere.

Letter 1

Sample Customer Notification Letter (with primary new carrier)
Date (60 days prior to exit)

Customer Name
Address
City, CT zip

YOUR SERVICE WILL BE TRANSFERRED TO (name of primary new carrier)
UNLESS YOU CHOOSE A NEW LOCAL TELEPHONE SERVICE PROVIDER
BY (40 days prior to exit Date).

Dear Customer:

We regret to inform you that as of (exit date) XYZ Company will no longer be providing your local telephone service in Connecticut. (explanation of specific company circumstances)

If you do not select a new local telephone service provider on or before (30 days prior to exit date), (name of primary new carrier) will automatically become your local telephone service provider effective (date). If you select an alternative provider after (30 days prior to exit date), your choice can only be put into effect after the change to (name of primary new carrier) and will therefore be delayed. You will not incur any charges for the change to (name of primary new carrier). If you select another provider of your choice, you may incur additional charges. In the transfer of service to (name of primary new carrier), all efforts will be made so that your present local telephone number will remain the same and your existing local service and calling features will be transferred to (name of primary new carrier).

If you do not want service from (name of new primary carrier), your action is required! You must select a new local telephone provider as quickly as possible but no later than (30 days prior to exit date). A list of most local telephone service providers may be found in your local telephone directory.

If you have any questions regarding the discontinuance of XYZ Company's local telephone service, please call (toll free number). Questions regarding (primary new carrier) should be directed to (toll free number of primary new carrier). XYZ Company regrets any inconvenience this change may cause you.

Sincerely,

Letter 2

Sample Customer Notification Letter (without a primary new carrier)

Date (60 days prior to exit)
Customer Name
Address
City, CT zip

YOU MUST CHOOSE A NEW LOCAL TELEPHONE SERVICE PROVIDER BY
(30 days prior to exit date)

Dear Customer:

We regret to inform you that as of (exit date), XYZ Company will no longer be providing your local telephone service in Connecticut. (explanation of specific company circumstances)

Your action is required! You must act now and select a new local telephone provider as quickly as possible but no later than (30 days prior to exit date) or you will lose your local telephone service. A list of most local telephone service providers may be found in your local telephone directory. If you require assistance, please contact XYZ Company (current company) at (toll free number). XYZ Company regrets any inconvenience this change may cause you.

Sincerely,