Mass Migration Requirements

These requirements were developed through a collaborative process by representatives from the industry. The requirements are to be used when a CLEC is exiting the local exchange services market, or a portion of its market, and has a customer base to migrate to other carriers. Such a mass migration will require special cutover procedures to accommodate a large number of service orders over a short period of time. Once the mass migration process begins, carriers will need to suspend normal order processing for the customers involved in the mass migration and follow the processes outlined in these requirements.

Adopted by MDTE Order August 7, 2002.

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I. Objective

When a CLEC discontinues local exchange services, the customers of that CLEC must have the opportunity to migrate to another local exchange carrier without interruption of service.

II. General Principles

The goals of a mass migration are to:

1. Ensure the customer does not lose service.
2. Maintain the ability of regulators to monitor events and assist parties if needed.
3. Avoid double migrations whenever possible. Double migrations are generally the product of timing constraints where the customer is migrated to the acquiring carrier, and then to the carrier of the customer's choice.
4. Ensure that customers are provided ample notification to allow them to select the service provider 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 service provider(s) to migrate the customers seamlessly.

III. Regulatory Notification

Both the FCC and the DTE require notification from any company that will no longer be serving customers in a particular market. In addition, the exiting provider must file supplements to either cancel or modify its tariffs, as well as plans for transferring customers and preventing slamming problems. Further, the DTE requires notification from the company 90 days in advance of discontinuing service or, upon a showing that 90 days' notice is not feasible, at the earliest possible date.

The exit plan filed with the DTE must include:

1. A sample of the letter to be sent to customers
2. A final termination date
3. A cutoff date when customers must select a carrier
4. A contact number for the cutover coordinator
5. Any arrangements made for an acquiring carrier
6. Steps taken with the number code and/or pooling administrator to transfer NXX or thousand number blocks (if applicable)
7. The current customer serving arrangements e.g. UNE-P, Resale, UNE-L or Full Facilities
8. The number of customers impacted
9. A list of customers with CSR information including circuit IDs (CKIDs**)**
10. Any transfer of assets/debts
11. Plans to modify/cancel tariff(s

12. Notification to the DTE if there are changes to the cutover plan

IV. Industry Notification

Because there are special order processing procedures associated with mass migrations, an acquiring carrier should no longer routinely process orders that involve customers impacted by the migration once the mass migration process has begun. To determine how to process orders, the acquiring CLEC should check with the exiting CLEC or the network service provider's project manager.

Notification will involve:

1. The DTE, when notified, will notify the CLEC contact list regarding any CLECs exiting the market. (While Verizon maintains this list, there is no obligation on its part to ensure its accuracy or update status.)

The acquiring CLEC agrees to a waiver of applicable performance order metrics.

V. Customer Notification

Companies involved in mass migrations must meet the following timelines in order to ensure enough time to migrate customers.

1. Exiting CLEC must notify the DTE of its plans at least 90 days prior to discontinuing service. The information required by the DTE is listed in Section III.
2. Exiting CLEC must notify its customers 60 days in advance of target exit date
3. Acquiring carrier must notify customers 30 days in advance of target exit date

If a carrier is unable to meet one or more of these deadlines, it must demonstrate to the Department that meeting the deadlines is not feasible, and it must provide the appropriate notices as soon as feasible.

Appendix A to these guidelines contains two sample letters that illustrate what information must be included in the letter to be sent by the exiting CLEC who is 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 carrier. Letter 2 represents the information that the exiting CLEC must send to the customer when there is no acquiring carrier.

Mass migrations involving an acquiring carrier must identify a cut-off date. The cut-off date is defined as the date after which customers will have to wait before they can obtain local exchange service from a different provider. When the customer is notified 60 days in advance, the cut-off date could be 20 days from the scheduled migration. This cut-off date will ensure that the customer has time (40 days) to make a decision and that the acquiring carrier has the time to send out notification information concerning the scheduled migration. Customers who have not selected an alternative carrier will then be transferred to the acquiring service provider. When the customer is not notified 60 days in advance, the cut-off date will depend upon the size of the migration and the notification timelines.

When there is no acquiring carrier, the exiting CLEC must establish a cut-off date as referenced in the timeline in Section VI, after which it puts the customer on "soft dial tone" or, if feasible, an announcement. For purposes of these migrations, "soft dial tone" is defined as the ability to call 911 only. Alternatively, when the telephone is picked up the customer hears an announcement instructing him/her to contact the company regarding local service immediately.

VI. Mass Migration Process

The exiting CLEC shall designate a "migration manager" responsible for managing customer migrations with the DTE and, if applicable, the acquiring carrier.

Each mass migration must have a program manager responsible for coordinating the overall migration. In addition, each of the parties involved in the migration must have a project manager who works with the program manager. The program manager will generally be selected from the acquiring carrier.

In order for the acquiring carrier(s) to migrate its customers seamlessly, the exiting CLEC must provide sufficient network information to the acquiring carrier and the DTE. Specifically, for UNE-L or full facilities-based migrations, the exiting CLEC must provide, 60 days prior to the target exit date, the applicable circuit IDs and associated telephone numbers as well as billing names and addresses and location addresses. With UNE-P or Resale migrations, the exiting CLEC must provide, 60 days prior to the target exit date, a billing name, address and telephone number with the associated working telephone number(s).

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.[1] 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.[2]

[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; ¶ 28.
[2] *Id*. § 64.1120

When processing orders for migrations, it should be emphasized that all parties need to be flexible. There will 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.

The mass migration timeline is summarized below.

Day	Milestone
90	✍ Exiting CLEC informs MA DTE of plans to exit market. ✍ DTE to inform industry 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)
60	✍ Exiting CLEC notifies its customers that it is exiting the market. Informs them that if they do not select another carrier within 40 days, 1. they will be transferred to the acquiring carrier (if there is one), or 2. they will be without local phone service (if there is no acquiring carrier) ✍ Exiting CLEC provides customer information to DTE and acquiring CLEC.
30	✍ Acquiring carrier notifies customers of their status, informing them that they have 10 days to select an alternative provider if they desire. ✍ Where Verizon is network service provider, acquiring CLEC notifies its Verizon Account Manager of its need for a Mass Migration Project Manager. (This is the minimum allowable timeframe. Acquiring carriers should notify Verizon as early as possible regarding a Mass Migration.) ✍ Acquiring CLEC notifies Verizon of the total number of lines and the Central Offices or collocations involved in the migration. (N.B. There is a maximum of lines that can be worked per night per geographical area.)
20	✍ Cut-off date if there is an acquiring carrier. Moratorium begins
17	✍ Project Manager advises acquiring CLEC of the due dates and the number of lines per Central Office per due date.
15	✍ Acquiring CLEC issues valid LSRs no later than 15 business days prior to due date, if required. (If reusing loop facilities, exiting CLEC must provide reusable circuit ID with the associated telephone number.) ✍ Project Manager provides specifics to be included on LSRs, e.g., Frame Due Times. Due dates on any LSRs sent after this interval must be negotiated with Verizon Project Manager. Late LSRs may not be included in Project.

12	✍ Upon receipt of valid LSR, Verizon to provide Firm Order Confirmation (FOC) to acquiring CLEC.
10	✍ If no acquiring carrier, cut-off date. Soft dial tone placed on lines. ✍ Where appropriate (i.e. loop migrations), acquiring CLEC provides Project Manager with spreadsheet or other negotiated document for each CO. Spreadsheet will include CO, PON, BTN, WTN, CLEC Cable and Pair, Circuit ID, and Out and In order numbers (obtained from FOC). ✍ Network service provider performs all pre-work to ensure migration's smooth progress (e.g. prewiring, ANAC, etc.) consistent with provisioning requirements of specific type of service.
2	✍ Network service provider notifies acquiring CLEC of any discrepancies. ✍ Acquiring CLEC takes appropriate actions required to correct discrepancies.
1	✍ Unresolved service order discrepancies rescheduled for evaluation.
0	✍ Target exit date. All scheduled orders worked. When there is no acquiring carrier, exiting carriers are authorized to terminate end user service at the end of the ten-day soft dial tone or announcement period. (*See* Section IX)

VII. NXX Code Transfers

An exiting CLEC that has any NXX codes or thousand number blocks assigned to it must make transfer arrangements with the code administrator in accordance with the Central Office Code Assignment Guidelines and Pooling Administration Guidelines developed by the Industry Numbering Committee.

VIII. E-911

CLECs discontinuing service must care for its E911 records before discontinuing service. Specifically, the CLECs must unlock all of its TN records in the appropriate E911 databases to allow its customers to be properly transitioned to a new carrier. This E911 unlock procedure is in accordance with the National Emergency Numbering Association's ("NENA") standards for Local Number Portability, to which all carriers must adhere.

IX. Termination Actions When There is no Acquiring Carrier

When an exiting CLEC serves its customers through UNE-P or Resale, the CLEC must request the underlying carrier to apply "soft dial tone" to customers who have not selected a new carrier by the cut-off date. Exiting carriers serving customers by UNE-L and full facilities-based arrangements must provide soft dial tone to customers who have not chosen a carrier by the carrier selection cut-off date.

For purposes of this document, "soft dial tone" is defined as the ability to call 911 only.

If technically feasible, an announcement may also be placed on the line, instructing the customer to call the local service provider. This procedure is designed to notify the customer of impending loss of local service and the need to act immediately. Soft dial tone, or the announcement, is to be placed on the line for the final ten days of service.

When there is no acquiring carrier, exiting carriers are authorized to terminate end user service at the end of the ten-day soft dial tone or announcement period.

Appendix A

Sample Customer Notification Letter (with primary new carrier)

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

YOUR SERVICE WILL BE TRANSFERRED TO (name of primary new carrier) UNLESS YOU CHOOSE A NEW LOCAL TELEPHONE SERVICE PROVIDER BY (20 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 Massachusetts. (explanation of specific company circumstances)

If you do not select a new local telephone service provider on or before (20 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 (20 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 your 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 (20 days prior to exit date).

After selecting a new local telephone provider, you should also contact your current intra-LATA toll provider and your long-distance provider to ensure that neither your current intra-LATA toll calling plan nor your long-distance calling plan is changed as the result of your change in local service. If you do not contact these providers to ensure that your current calling plans remain in place after your transfer of local service, you may be charged basic rates (non-calling plan rates) for intra-LATA and long-distance calls.

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, MA zip

YOU MUST CHOOSE A NEW LOCAL TELEPHONE SERVICE PROVIDER BY (20 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 Massachusetts. (explanation of specific company circumstances)

Your action is required! You must select a new local telephone provider as quickly as possible but no later than (20 days prior to exit date) or you may lose your local telephone service.

Generally, you can find a list of most local telephone service providers in your local telephone directory. If you require assistance, please contact XYZ Company (current company) at (toll free number).

After selecting a new local telephone provider, you should also contact your current intra-LATA toll provider and your long-distance provider to ensure that neither your current intra-LATA toll calling plan nor your long-distance calling plan is changed as the result of your change in local service. If you do not contact these providers to ensure that your current calling plans remain in place after your transfer of local service, you may be charged basic rates (non-calling plan rates) for intra-LATA and long-distance calls.

XYZ Company regrets any inconvenience this change may cause you.

Sincerely,