

New section 4.3.3(b) and the note to new section 4.3.10 refer to the potential use of a 'bulk PNV' where multiple sites are involved and the Losing C/CSP consents. This is a welcome inclusion as currently individual PNV Requests are required for each individual site, which can be inefficient and unnecessarily increases port processing fees.

However, the text box at the beginning of section 4.3 should be updated to reflect the potential use of a bulk PNV (as the current text states 'All PNV requests are limited to a single Customer Address...').

It would also be prudent to insert a definition of 'bulk PNV' into section 2.2. One reading of the note to new section 4.3.10 is that a Gaining C/CSP may request the Losing C/CSP use a bulk PNV process only in the case of a Large PNV. However, the Gaining C/CSP should be able to request the use of a bulk PNV process in other cases where such may be feasible. Given the bulk PNV process will only ever be used with the consent of the Losing C/CSP, and the process is intended to improve the efficiency of multi-site ports rather than Large ports per se, there is no need to limit its potential availability only to Large PNVs.