



February 6, 2018

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: Telephone Number Portability**

CC Docket No. 95-116; WC Docket Nos. 09-109, 07-149

Dear Ms. Dortch:

On February 2, 2018, B. Lynn Follansbee, USTelecom, Krista Witanowski, CTIA, Rosemary Leist, Sprint, Robert Morse, Verizon, Indra Chalk, T-Mobile, Jeb Benedict, CenturyLink, Jacquelyne Flemming, AT&T, Michael Saperstein, Frontier, Michael Skrivan, Consolidated (via phone), Deborah Tucker, Verizon (via phone) and Teresa Patton, AT&T (via phone) met with Nirali Patel, Legal Advisor to Chairman Ajit Pai, to discuss the current status of the Local Number Portability Administrator (LNPA) transition.

During the meeting, the parties provided an update on the status of the LNPA transition from Neustar to iconectiv. The parties expressed their commitment and optimism to seeing the LNPA transition occur on time through an efficient and effective process. Substantial progress has been made on the LNPA transition since the Commission's 2016 Order and nears a critical milestone with the first regional cutover scheduled to occur on Sunday, April 8<sup>th</sup>.

The parties noted, however, that one critical issue remains outstanding - a contingency plan to roll back to the current LNPA (Neustar) in the unlikely event that the transition to the new LNPA (iconectiv) encounters a problem.<sup>1</sup> While the parties expect the transition to occur on time and successfully based on the reports of the Transition Oversight Manager (TOM), the parties believe that a contingency roll back plan is an appropriate and necessary step to ensure the transition does not impact consumer choice when porting a telephone number among competing telecommunications providers. The parties expressed concern for this important consumer safeguard because discussions about this issue between the TOM, NAPM, LLC, Neustar and iconectiv have broken down as the transition nears completion and despite the availability of a well-thought contingency roll back plan initially developed by the TOM and

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<sup>1</sup> The parties noted that the roll back to the current LNPA may be necessary in the event of a catastrophic failure during the initial cutover period.

iconectiv, with participation and input provided by Neustar, and ultimately accepted by the NAPM, LLC.<sup>2</sup>

Notably, the parties understand that NAPM, LLC evaluated various contingency plans, taking into consideration the views of LNPA transition stakeholders, and decided on a process that is consistent with industry practices, creates operational and technical efficiencies – and, critically, aligns with the transition timeline. Based on these considerations, the TOM facilitated at least five industry meetings, in which it was decided that a manual, rather than automated, contingency roll back process would be the most reasonable approach to address any issues in the unlikely event of a problem with the new LNPA after the initial cutover period. Unfortunately, given recent public statements and regulatory filings about this issue, the parties expressed concern that other stakeholders may have the misimpression that the LNPA transition is at risk, even as the TOM itself has reported that the LNPA transition remains on schedule.

To clarify the situation and ensure the transition is not disrupted, the parties asked the Commission to use its oversight authority<sup>3</sup> to encourage the entities responsible for the LNPA transition (NAPM, LLC, Neustar, iconectiv and TOM) to resolve this issue in a way that maintains the critical LNPA transition timeline. In addition, the parties expressed support for any Commission efforts to encourage the entities responsible for the LNPA transition to focus on the task at hand and avoid any rhetorical exchanges that undermine confidence in the LNPA transition. At this point in the LNPA transition, all parties should be working in good faith to ensure an efficient and effective transition that will ultimately benefit American consumers and public safety.

Please contact the undersigned should you have any questions.

Respectfully submitted,

USTELECOM ASSOCIATION



By: \_\_\_\_\_

B. Lynn Follansbee  
Vice President – Law & Policy

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<sup>2</sup> See e.g., Letter from Todd D. Daubert, Counsel to the NAPM, LLC, to Marlene Dortch, Secretary, FCC, CC Docket, 95-116, WC Dockets Nos. 09-109 & 07-149, Attachment at 1-2 (filed Jan. 29, 2018 (filing document at request of the Transition Oversight Manager); Letter from Thomas J. Navin, Counsel to Neustar, Inc., to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket Nos. 09-109 & 07-149, Attachment A, at 2 (filed Jan. 16, 2018).

<sup>3</sup> *In the Matter of Telephone Number Portability, et al.*, Order, 31 FCC Rcd 8406, 8407-23 (Jul. 13, 2016).