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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Telephone Number Portability, et al. CC Docket No. 95-116; WC
Docket Nos. 09-109 and 07-149*

Dear Ms. Dortch:

Neustar, Inc. (Neustar) submits the attached response¹ provided today to the Transition Oversight Manager (TOM) and North American Portability Management LLC (the NAPM) to the December 29, 2017 Local Number Portability Administrator Transition Status Report.² Neustar's response explains how this report once again fails to inform stakeholders of key elements of transition readiness and the potential for what is now imminent consumer service disruption. Specifically, Neustar's response expresses concerns over (1) development and testing delays with iconectiv's Number Portability Administration Center (NPAC) and the lack of transparency surrounding this issue, and (2) the lack of an agreed-upon, viable contingency rollback that will restore NPAC service with Neustar's platform or personnel should the new system fail.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

/s/ Thomas J. Navin

Thomas J. Navin
Counsel to Neustar, Inc.

¹ See Attachment A.

² Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 and 09-109, CC Docket No. 95-116, (filed Dec. 29, 2017) ("LNPA Transition Status Report").

Attachment A

Neustar Response to 12/29 NAPM-TOM Report
1/16/2018

Neustar writes in response to the LNPA Transition Status Report delivered to the Federal Communications Commission on December 29, 2017.¹ As Neustar has noted in previously-filed responses, the Status Report remains an unreliable and opaque indicator of iconectiv's readiness to launch a new NPAC system.

The timeline for launching iconectiv's NPAC service is winding down; there are less than 60 days remaining before critical law enforcement and public safety services are launched by iconectiv, and less than 90 days before the flash-cut of NPAC services in the Southeast region, i.e. in Georgia, Alabama, Mississippi, Louisiana, Tennessee, Kentucky, North Carolina, South Carolina, and Florida, as well as Puerto Rico and the US Virgin Islands. For reference, the Southeast region is the largest U.S. NPAC region, containing over 154 million consumer and business telephone numbers, or 20% of the total number of NPAC records across all seven regions. Nevertheless, iconectiv still has not finally developed its NPAC platform, and development delays continue to result in the abandonment of vital testing requirements. Most seriously, due to the TOM's failure to establish a viable contingency rollback plan, there is no path back to a stable platform for consumers in the affected states if rollout does not go as planned.

The TOM's long lack of transparency in communicating with the public calls into question the veracity and completeness of the current and most recent reports. Neustar reiterates its concern that iconectiv's escalation to the NAPM on August 2, 2017 regarding increased risk to the iconectiv launch schedule was never included in any official Status Reports, was not revealed to the North American Numbering Council until December 2017, and to this day remains without any substantiation or transparent investigation. Nevertheless, considering the growing list of stark discrepancies between industry best practices (as well as early iconectiv commitments) and the current reality, it is apparent that the impending launch of a newly-developed NPAC platform presents significant risks that are not being acknowledged.

- Despite early project plans which allowed for at least one year of industry testing following iconectiv's code-complete date of a newly coded system, in the final plan, only three months of industry testing were allocated.
- Given additional issues discovered in November 2017, as of today the iconectiv NPAC is still not fully developed, leaving less than eight weeks before code-freeze to validate connectivity, performance, and functionality.
- No information has been published by the TOM regarding acceptance criteria or testing results of the new NPAC's performance under load conditions.
- The vast majority of mechanized users will be offered no opportunity to validate their connections for performance or disaster recovery before launch.
- No parallel testing between the incumbent and successor NPACs to verify system parity is planned.
- No industry testing using converted data has been performed, or is planned.

Despite industry best practices that a platform the size of the NPAC be subjected to 10-20 thousand regimented test cases², validation by the industry has been limited to less than 500, or 5% of the recommended amount. The

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² These statistics reflect a "waterfall" implementation method, which iconectiv chose for its from-scratch NPAC implementation.

overwhelming majority of the testing for the iconectiv system is not being performed by the TOM or any other independent party, but rather by iconectiv itself. The content or findings of these iconectiv internal tests has never been revealed. The results of cutting so many corners in quality control is entirely predictable: industry-accepted algorithms predict that there are 20,000 to 25,000 coding errors or defects in the version of NPAC software currently being tested, and there will be at least 10,000 to 20,000 software defects, impacting millions of critical data elements, in the iconectiv system planned to be launched in April.

Current State of Contingency Rollback

In conjunction with the current published schedule and the termination notice provided by the NAPM in November 2017, Neustar is terminating all aspects of its NPAC service in the Southeast Region on April 8 as iconectiv launches its platform. This includes help desk staff and subject matter expertise for Users in the affected states, along with all database, application, and network availability. For the avoidance of doubt, given the TOM's failure to establish workable parameters after nearly two years of effort, following an April 8 iconectiv launch Neustar will not be available to provide resources to assist in issue resolution, and there will be no means to restore NPAC service with Neustar's platform or personnel.