Todd D. Daubert
Partner

todd.daubert@dentons.com
D   +1 202 408 6458

Dentons US LLP
1900 K Street, NW
Washington, DC 20006
United States

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dentons.com

January 31, 2018   **VIA ECFS**

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Secretary Dortch:

The North American Portability Management LLC (the NAPM LLC), by its attorneys, hereby files a written summary of the NAPM LLC's status updates to the Federal Communications Commission (FCC or Commission) regarding the transition from the current local number portability administrator (LNPA), Neustar, to the new LNPA, Telcordia d/b/a iconectiv (the Report).[1] This Report updates the FCC, the public, and all interested stakeholders regarding transition activities to date in accordance with requirements of the *LNPA Selection Order*[2] and guidance received from the FCC on June 24, 2015.[3] The NAPM LLC will continue to file written updates of this Report with the FCC at the end of each month until transition is complete.

*   *   *

Transition Oversight Plan

The Transition Oversight Plan (TOP), dated August 31, 2015, was edited and refiled December 5, 2016, and the TOP is published on the public portion of the NAPM LLC's website at www.NAPMLLC.org.[4] Although one or more transition milestone dates may be adjusted as appropriate to mitigate risk, the

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[1]   This Report is intended to provide an update with respect to events that occurred during the prior month. Although the monthly Reports may, at times, reflect certain developments that occurred between the end of the month for which the Report is filed and the date upon which the draft Report received final approval by the NAPM LLC for filing with the Commission, the Reports generally do not reflect all developments that occur during the month in which the Report is filed, which will be reflected in the Report for the following month. Please review previous Reports for information about previous developments.

[2]   *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116, ¶¶ 158-59 (rel. Mar. 27, 2015) (*LNPA Selection Order*).

[3]   This summary reflects information relevant to the transition as managed by the NAPM LLC with the assistance of the TOM and the oversight of the Commission.

[4]   *See* https://www.napmllc.org/Docs/npac/ref_docs/08%2031%2015%20-%20Updated%20Transition%20Oversight%20Plan.pdf.

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previously published dates remain accurate, and the transition is currently on track to meet the Final Acceptance Date of May 25, 2018.

Executive Summary

NAPM LLC and its independent, third-party Transition Oversight Manager (TOM) continue to monitor and manage the progress of the LNPA transition between the incumbent LNPA and the incoming LNPA. This includes the development of the Number Portability Administration Center Service Management System (NPAC SMS) platform; systems testing with service providers, systems vendors, and providers of telecommunications-related systems (PTRS) as well as public safety and other users; onboarding of NPAC users and ancillary services users including law enforcement entities and telemarketers; execution of the data migration and go-live events; and outreach to stakeholders and the public.

As of December 29, 2017, the transition is focused on industry testing against the latest software release for the NPAC SMS. The planned final acceptance date of May 25, 2018 for the new NPAC remains unchanged but faces significant risks. Several issues and vendor non-conformances related to interface specifications have been identified and require mitigation. With additional systems testing still remaining, new issues may arise that require resolution and add pressure to the program timeline.

Program Dashboard

Work Stream	Current Status	Highlights
NPAC SMS Platform Build	🟢	• Data center construction and configuration was completed ahead of schedule • The final software release (Release B) has been completed and provided to industry for testing as of 12/18 • The status of this work stream has been changed from "At Risk" last month to "On Track" as Release B development completed per revised schedule
User Onboarding	🟢	• 94% of NPAC users are engaged in onboarding • 1,409 NPAC users have completed registration • 27% of Enhanced Law Enforcement Platform (ELEP) entities have registered
Industry Testing	🟡	• All Acceptance Test Plans (ATPs) have been approved in coordination with the FCC • Industry testing is in progress • The status of this work stream is "At Risk" because issues identified during industry testing require longer than expected resolution timeframes, and testing has determined that one vendor has significant non-conformances with the applicable specifications that must be remedied and retested

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Data Migration and Go-Live	🟢	• Finalizing parallel operations requirements • All regional data migration testing is complete, pending ongoing validation of loaded data
Stakeholder Outreach	🟢	• December Transition Outreach and Education Plan (TOEP) webcast was held on 12/12 and had 216 attendees • Contingency Rollback Industry Session webcast will be held on 1/16 at 3PM ET • January TOEP webcast will be held on 1/17 at 3PM ET

NPAC SMS Platform Build

The development of the hardware and software for the new NPAC SMS platform is critical to ensuring the new NPAC meets all requirements. Each software version undergoes rigorous quality assurance testing before being released to industry testers. These activities include detailed development verification, the execution of thousands of multi-step test scenarios to ensure conformity to the Functional Requirement Specification, and internal execution of all applicable industry test cases. This development has been completed in accordance with the revised schedule despite the additional development needed to address poorly documented NPAC requirements and specification non-conformances discovered during industry testing. This schedule was established and met to ensure that the entire suite of internal testing and quality assurance was performed per industry-accepted best practices. The final version of the NPAC SMS Platform (Release B) completed iconectiv quality assurance and was provided to industry for testing on December 18, 2017. This software included fixes for issues that surfaced in the industry testing of the initial software code (Release A). At this point, all planned development is complete.

User Onboarding

Onboarding is required for users to port or otherwise make use of the new NPAC and its ancillary services as well as to take part in testing activities. Onboarding of NPAC users is progressing well with the vast majority of service provider, service bureau, and PTRS users having completed registration. Significant progress is also being made in onboarding more law enforcement system users and other ancillary services users in advance of the March 2018 transition of these services. The TOM, iconectiv, and FCC continue to engage users and promote their onboarding as the transition date approaches.

In late December 2017, iconectiv provided a list of users that have not registered to the FCC. Users that have not completed onboarding before the transition will not have access to NPAC services.

Industry Testing

Industry testing allows carriers to determine if their systems used for managing porting transactions will function properly. Testing is mandatory for mechanized users and optional for those interfacing through other interfaces. Vendors of these systems are required to certify against the industry test cases to demonstrate operational compliance with the NPAC.

For the first NPAC software release (known as Release A), one system vendor did not fully certify after all of the applicable test cases had been executed. Resolution of these issues is extending past the planned vendor certification window, which means some service provider testing has begun with systems

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that have not been fully certified. Fixes for these issues have been developed by iconectiv and the impacted vendor, and retesting began in December 2017.

In November, the first phase of the final NPAC software version (known as Release B) was delivered so that XML testing could begin. On December 18, 2017, testing of the final portion of Release B began. One vendor system under test has been fully certified against all test cases. The three remaining vendor systems requiring certification are in the midst of testing, and issues related to non-conformances that require remediation have been identified. Successful completion of Release B testing is a key gate to maintaining the overall transition schedule.

Additionally, round robin testing has begun with 20 interested service provider testers engaged, 6 testers paired, and no incidents reported. Providers are encouraged to engage in this group testing to add to the robustness of the transition testing.

Data Migration & Go-Live

Preparation for the transition between LNPAs involves the testing of data migration to ensure the integrity of the data and successful cutover during the transition window. These data migration tests have spanned multiple phases and demonstrate readiness for transition.

Mechanized users of the NPAC need to ensure that their production circuits connecting to the new NPAC are established and verified in a timely manner before the launch. The end-of-year deadline to establish connectivity was communicated to the 22 mechanized users requiring connection, but only 12 of them met that deadline, and some do not yet have expected circuit delivery dates, which creates additional risks for their customers.

To mitigate risk during the active transition period, significant effort has been spent in establishing a contingency rollback plan. This contingency rollback plan would be exercised in the event of a catastrophic and unrecoverable system failure within the incoming LNPA during the transition and revert porting responsibilities to the incumbent during issue resolution. However, the incumbent LNPA has yet to agree to terms that would govern the resumption of NPAC services in such an eventuality. While an incident that would trigger such a rollback is unlikely, it is still prudent to establish protocols and test them.

Stakeholder Outreach

The TOM is conducting outreach activities to educate and engage industry stakeholders to their obligations and expectations in supporting the transitions. These efforts include monthly TOEP meetings, which have seen steady attendance, as well as issue-related meetings such as preparation for a contingency rollback during transition. These efforts provide updates and context to the many stakeholders and allow them to provide input and feedback. The TOM hosted the December TOEP webcast on December 12, 2017, which was attended by 216 participants. The TOM hosted the Contingency Rollback Industry Session webcast on January 16, 2018, at 3PM ET and the January TOEP webcast on January 17, 2018, at 3PM ET.

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Program Risks

The following is a non-exhaustive list of summary-level program risks pertaining to LNPA transition:

- Disagreements by the incumbent LNPA about the TOM's authority to make transition decisions as well as enforce dispute resolution are leading to issues with vendor testing issue mitigation and contingency rollback planning;

- Lack of agreement between the incumbent LNPA and the NAPM LLC regarding the incumbent LNPA's obligations with respect to parallel operations. In particular, disagreement by the incumbent LNPA regarding its obligation to resume NPAC operations in the event of an industry-led rollback remains a point of concern;

  - To ensure readiness in the event of a rollback, the TOM has sponsored a regular cadence of contingency rollback planning meetings since 2015. As part of these meetings, a wide variety of potential rollback approaches were identified and evaluated on a timely basis. The industry-led approach was selected by the NAPM LLC because, in the judgment of the TOM and the NAPM, it *best* addresses technical, resource, schedule, and contractual constraints.

- Issues discovered during industry testing require remediation and regression testing that stress already tight development and testing schedules; and

  - XML testing has surfaced issues with one vendor that is not conforming to defined interface requirements;

- 10 of the 22 Service Providers and Service Bureaus did not meet the 12/31/17 target for connectivity with the new NPAC.

Stakeholder Actions

There are a number of actions stakeholders should take to support and facilitate the transition. They include:

- Complete registration with the new LNPA *as soon as possible*, if not already accomplished,

- Verify certification status of your system vendor and readiness to support service provider testing,

- Urge your vendor to quickly remediate any failed test cases or instances of non-conformance with requirements as identified by the TOM

- Ensure, if you are a user of mechanized service bureaus, that entities who missed the December 31 deadline, complete connectivity to the new NPAC *as soon as possible*,

- Participate in ad hoc and round robin testing once your system or service bureau has completed certification, and

- Review distributed contingency rollback preparatory materials, such as the resubmission aid, and ensure your company is prepared to undertake required resubmissions in the event of a rollback.

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Coming in the next month

In January, Release B vendor testing will continue and, as vendor systems certify, service providers will finalize their industry testing. As timely resolution of any identified issues is essential to maintaining the transition schedule, issues related to industry testing of Release B are being raised and addressed with the TOM directing responsible parties to take action where necessary and keeping stakeholders informed of progress. Additionally, execution of the Acceptance Test Plans (ATPs) will continue with the TOM monitoring progress and results. Updates on the ATPs will be a regular part of the TOEP outreach program.

Please see Appendix A for additional transition information, status and TOM activities for the past month.

*   *   *

iconectiv

On July 25, 2016, the FCC released a final decision approving the recommendation of the NANC that iconectiv serve as the next LNPA and the terms and conditions of the draft Master Services Agreement (MSA) that the NAPM LLC and iconectiv had previously submitted to the FCC.[5] On August 8, 2016, the NAPM LLC and iconectiv executed the MSA. On September 21, 2016, iconectiv held the first of several planned LNPA Transition onboarding webcasts for Service Providers, Service Bureaus and Providers of Telecom Related Services. In addition, iconectiv is moving forward with meeting the requirements and deadlines set forth in the Master Services Agreement.

For information from iconectiv about the NPAC transition, please send an email to **LNPA-ACCT-MGMT@iconectiv.numberportability.com**.
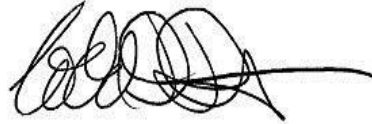
Neustar

Neustar began billing industry service providers on their December 2015 monthly Statement of Work (SOW) invoices for transition service support billable since July 2015, consistent with the terms of SOW 97. In addition, the four-way non-disclosure agreement, which facilitates joint vendor meetings to discuss transition related issues, was signed by Neustar, the NAPM LLC, the TOM, and iconectiv on February 2, 2017. Lastly, Neustar has executed the User Agreement with iconectiv, and has completed the vendor on-boarding process.

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[5]   *See Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (rel. July 27, 2015) (*LNPA Approval Order*).

Please contact the undersigned if you have any questions or would like any additional information about the issues discussed herein.

Sincerely,

Counsel to the NAPM LLC

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Appendix A: Additional Transition Information, Status and TOM Activities for the Past Month

- Confirmed delivery of the Pooling Administrator System (PAS) API to the incoming LNPA and monitored testing of the software; 1 new incident was identified and closed

- Confirmed progress on the 14 Problem & Issues Management forms (PIMs) arising from the vendor testing process. These PIMs and accompanying change orders address all of the non-conformities and ambiguities identified in Release A vendor testing, and, once fully implemented, will ensure compliance to the Functional Requirements Specifications (FRS):

  - 4 have been completed by the incoming LNPA and are ready for testing (no change since last month);
  - 8 were accommodated by the incoming LNPA and were incorporated into Release B for testing, beginning on 12/18 (no change); and
  - 2 were accommodated by the affected vendor and were made available for testing, beginning on 12/18 (+2)

- Anonymized summary results of industry testing are being provided to monitor the status and progress of NPAC testing while protecting sensitive security and proprietary information; these results include:

  - CMIP Vendor Certification Testing
    - 13 systems under test (SUTs) are being certified (no change);
    - 5 SUTs have been certified as of 12/29 (no change); and
    - 22 incidents remain open as of 12/29 (+2)
  - XML Vendor Certification Testing
    - 4 SUTs have started testing as of 12/29 (+1);
    - 1 SUT has completed certification (+1);
    - 10 new XML vendor testing incidents were identified, and 10 were resolved; and 7 XML vendor testing incidents remain open
  - Mechanized User Testing
    - 28 SUTs have started testing as of 12/29 (no change);
    - 26 SUTs have completed their mandatory testing as of 12/29 (+1);
    - No new mechanized user testing incidents were identified and 7 were resolved; and
    - 1 incident remains open as of 12/29 (-7)
  - Low-Tech Interface (LTI) Testing
    - 21 LTI users have started testing (+4); and
    - 2 LTI users are preparing to test (no change)

- Continued preparatory activities for Group and Round Robin Testing by collecting system profile details of Service Providers (SPs) that will participate in testing and facilitating the process for SPs to partner with each other to execute testing;

- Verified that 57 of 57 Industry Methods and Procedures (M&P) were approved;

  - 2 M&Ps were consolidated into a single M&P reducing the previous total from 58 to 57

- Incoming LNPA continued to onboard users to its new NPAC platform. Current onboarding status as of 12/29 indicates:

    - ~96% of SP/SB/PTRS users have started onboarding (+4%), and 1,409 NPAC users have completed registration (+69);
    - 378 WDNC entities have started registration (+109), and 114 have completed registration (+62);
    - 90% of ELEP entities have responded to outreach (+2%), and 27% have fully registered (+8%); and
    - Public Safety / IVR registration has launched in all 50 states (no change), and 1106 have completed registration (+199)

- Confirmed that 12 of the 22 Service Providers have installed and connected production circuits, 2 of which have completed installation and configuration of all their circuits; and

- 9 parallel operations term sheets have been approved by the NAPM (Data Migration P1/P2, CMA, Ancillary Services, Website Migration, ICN, SPID, MUMP, Helpdesk, IVR, and NUA/NUE)