



Michigan Internet & Telecommunications Alliance

February 8, 2018

Ex Parte Letter
Via Electronic Filing

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

Re: *Telephone Number Portability, CC Docket No. 95-116; Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al., WC Docket No. 07-149; Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration and to End the NAPM LLC's Interim Role in Number Portability Administration Contract, WC Docket No. 09-109*

Dear Ms. Dortch:

I am writing on behalf of the Michigan Internet and Telecommunications Alliance (“MITA”), a group of small Michigan communications companies,¹ to urge the Commission to ensure that there is a viable and tested contingency rollback plan before the LNPA Transition begins, a process currently scheduled to begin in two months on April 8, 2018. MITA appreciates Chairman Pai’s recognition of the urgency of having a viable rollback plan established before the LNPA Transition begins.

¹ Michigan Internet and Telecommunications Alliance (“MITA”) was formed as an outgrowth of the Michigan Communications Carriers Association, Internet Service Providers, Web hosting facilities, software programmers and engineers. All of these companies have a common interest in the core value of a fast robust communications infrastructure here in Michigan. It is the goal of this alliance to showcase the innovative technology that these companies are deploying and encourage policymakers to establish a regulatory framework for future growth that brings high-tech, communications-based jobs to Michigan and maximum choice to Michigan residents and businesses.

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As a member of the LNP Alliance, MITA has been encouraging the Commission to take all measures necessary to ensure a seamless LNPA Transition, not only for the nation's largest carriers, but also for small and mid-sized providers as well. MITA does not agree with USTelecom that the contingency rollback plan previously proposed by iconectiv and endorsed by the large-carrier NAPM, LLC, was a viable rollback plan.² To my understanding, the proposed plan did not allow for testing by iconectiv and Neustar. In addition, because it was a manual plan, it did not accommodate the limited resources of smaller carriers. To the extent that smaller carriers are unable to adequately manually reenter information or incur expenses necessary under the manual plan, the NPAC will be corrupted for all carriers. Moreover, rushing forward without testing was never a good idea.³

MITA supports Chairman Pai's February 2 letter requiring further negotiation of a better rollback plan, provided that such improved plan includes testing and well-publicized processes and procedures.⁴ If such a plan cannot be agreed to and implemented on the existing Transition schedule, MITA does not support rushing ahead without a proper rollback plan, including testing, in place.

Please do not hesitate to contact me with any questions regarding this filing.

Respectfully Submitted,

/s/ John Liskey

John Liskey
Executive Director

cc: Nirali Patel

² See Letter from B. Lynn Follansbee, Vice President, Law & Policy, USTelecom to Ms. Marlene Dortch, Secretary, FCC, CC Docket 95-116 (Feb. 6, 2018).

³ In addition, despite USTelecom's claim to the contrary (*id.*), while meetings were conducted to discuss the current inferior rollback plan, there was no consensus decision made at those meetings, including no vote or other request for the consensus of those in attendance.

⁴ See Letter from Chairman Ajit Pai to Lisa Hook, President and CEO of Neustar, Inc. *et al.*, CC Docket 95-116 (Feb. 2, 2018).