

February 23, 2018

VIA ECFS

The Honorable Ajit V. Pai
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Chairman Pai:

The North American Portability Management LLC ("the NAPM LLC"), by its attorneys, writes to provide an update in response to your letter dated February 2, 2018 regarding a contingency rollback plan for the Local Number Portability Administrator ("LNPA") transition. The FCC instructed the North American Portability Management LLC ("the NAPM LLC"), iconectiv, Neustar and the Transition Oversight Manager ("TOM") to carry out their responsibilities in good faith to identify areas of common agreement regarding a potential testing plan for industry-led contingency rollback that would ensure adherence to the April 8, 2018 deadline for cutover to the new LNPA in the Southeast Region and a Final Acceptance Date of May 25, 2018. As requested, the NAPM LLC is providing this update about the outcome of these efforts. From February 12 to February 16, the NAPM LLC, Neustar, and iconectiv engaged in an intensive series of daily working sessions, facilitated by the TOM. Though a number of proposals were considered, and some common ground was found (specifically, agreement that connectivity testing and industry outreach were both beneficial and should be continued, and that the current resubmission tools provided to the industry were useful), no mutually-agreeable contingency rollback approach was identified.

Over the course of the sessions, there have been a variety of discussions and offers made in an effort to reach a compromise that would secure the agreement of all parties to support contingency rollback if necessary. The offers made by the parties are summarized in **Table 1** as follows:

TABLE 1

iconectiv offered to	NAPM LLC offered to	Neustar offered
Augment and expand support for service provider testing and troubleshooting from iconectiv engineering	Limit the rollback period to not more than 24 hours after each regional transition; after that period any errors would be repaired by iconectiv with no recourse to rollback	Additional details on suggested tests, but no material change in previously stated positions
Develop a pre-arranged rollback simulation, under which service providers could elect to use Neustar suggested test cases	Restrict service provider use of MUMP and Pooling interfaces for the rollback period (24 hours) and remove the requirement for Neustar to provide BDD files until rollback is complete	
Arrange and support a voluntary group rollback simulation including a post-testing database validation, as suggested by Neustar	Remove all performance requirements during and after rollback, and compensate Neustar for additional necessary work, if any, that is not already covered by the fees that Neustar will already be receiving through May 25, 2018 and any further extensions	

The TOM also offered to establish an enhanced reporting mechanism for rollback testing (similar to that successfully deployed for service provider group and round robin testing) and conduct additional outreach and notification.

The NAPM LLC and iconectiv proposals were intended to bridge several key gaps between the parties' positions that pre-date the FCC's request. These gaps are noted in **Table 2** below:

TABLE 2

	NAPM LLC	Neustar
Participation	Testing by volunteer SPs, as usual for the industry, is sufficient	Minimum of all mechanized SPs and 15 of 20 top LTI users
Type of testing	Simulation testing similar to current group/round-robin method is acceptable	Group simulation for all mechanized SPs and 15 of 20 top LTI users simultaneously
Enforcement	Testing shall be voluntary	Testing shall be mandatory
Certainty	Neustar's guaranteed participation in rollback is the goal of the negotiation	Neustar's participation in rollback is not guaranteed (remains conditional/at-risk) even if the NAPM were to agree to all of Neustar's current requirements for rollback testing

Beyond differing views on whether mandatory testing is necessary and warranted, the gaps are critical because the mandatory testing requirements are not achievable within the current migration schedule.

The additional proposals and simplifications, which limited volumes and thereby the potential load and risk in contingency rollback, did not result in a change in Neustar's position on mandatory testing. Neustar also indicated that these testing requirements are necessary, but not sufficient to reach agreement, which the NAPM LLC understands to mean that even if all requirements were conceded, Neustar would be unable to commit to supporting contingency rollback until the completion of all testing. Neustar further communicated that it expected testing to be unsuccessful and that the outcome would be a need to delay the transition while an acceptable solution was developed.

In evaluating the current situation, and the extensive requirements Neustar sought, the NAPM LLC's limited asks of Neustar should be clearly understood. The NAPM LLC, on behalf of the industry, has attempted to secure the following performance from Neustar with the constraints noted in **Table 3**:

TABLE 3

	Neustar performance
Connectivity	<ul style="list-style-type: none"> On request of the NAPM LLC, allow service providers to re-connect with the Neustar NPAC, following the current industry-standard procedures for returning from a maintenance window
NPAC services	<ul style="list-style-type: none"> Accept and process normal transactions from service providers, using all normal interfaces (CMIP, XML, LTI) and following business-as-usual procedures Operate the help desk according to normal procedures, providing assistance to resolve exception conditions as per usual
Beneficial constraints (constraints on the industry that reduce the impact and/or risk to Neustar)	<ul style="list-style-type: none"> Rollback would only be an option for the first 24 hours, which greatly limits the volume of transactions that the industry would need to resubmit The industry would not use the MUMP interface while the rollback option was available, eliminating the need to resubmit MUMP jobs, or other project related requests during a rollback iconectiv would not request Pooling work while the rollback option was available, eliminating the need to manage resubmission of Pooling jobs during a rollback The industry would not require BDD files from Neustar during a rollback, eliminating the risk of distributing an incorrect BDD The NAPM LLC would not require Neustar to meet performance targets during or after a rollback, eliminating the risk of penalties

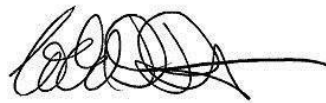
Of course, the items called out in this table are in addition to Neustar's timely transfer of accurate and complete data leading up to and during the migration. This is critical and an essential element in ensuring rollback is not required.

It is also important to understand that while the cutover for the Southeast Region will occur on April 8, 2018, the term for Neustar's services will not end until May 25, 2018, and the NAPM LLC has the right to extend the term for another six (6) months at any time before May 25, 2018. The termination -- or

expiration -- of the MSAs with Neustar is not in any way tied to cutover. Moreover, billing by, and payment to, Neustar will continue through the entire term of the MSAs and not be diminished even if they are not operating a region, and thus Neustar will be paid for all seven regions at least through May 25, 2018. Although Neustar has said that it will not participate in industry-led contingency rollback, the NAPM LLC would like Neustar to agree that it would undertake the limited tasks set forth in Table 3 upon request by the NAPM LLC within the first 24 hours after cutover in the extremely low possibility that iconectiv suffers the type of catastrophic failure after processing ports that iconectiv cannot fix in place in a reasonable amount of time.

The NAPM LLC negotiated in good faith and sought compromise. Though basis for agreement was not found, the NAPM LLC will look for opportunities to productively apply the applicable aspects of the working session proposals to the current industry-led contingency rollback approach. We would be happy to provide any further detail upon request.

Sincerely,



Todd D. Daubert
Counsel to the NAPM LLC

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