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February 26, 2018

VIA ELECTRONIC FILING

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

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

Dear Ms. Dortch:

On February 22, 2018, the undersigned and Andrew Fisher, Deputy General Counsel of Comcast Corporation (“Comcast”), met with Nirali Patel, Special Counsel to Chairman Pai, and Alison Cheperdak, Law Clerk, in the Chairman’s office. During the meeting, the parties discussed the status of the Local Number Portability (“LNP”) transition.

Comcast expressed its support for completion of the transition without delay. Comcast has engaged in thorough testing for more than six months of its readiness for the new NPAC transition, including testing multiple use cases and round robin testing with several other service providers.

Moreover, the timing for the first regional cutover – in the Southeast NPAC region on April 8, 2018 – is designed to minimize impacts to the industry in several ways. First, the cutover will begin during a regular maintenance window on a Sunday. Because only a small number of service providers engage in Sunday porting, the volume of ports will be at its lowest levels. Second, the type of ports permitted during the transition will be limited to competitive ports (*i.e.*, adds, deletes, and modifies), which will further reduce the volume of ports during the transition. Notably, Comcast’s competitive ports on Sundays are typically much lower than during Monday to Saturday, and any manual port resubmissions that may be needed in a roll back scenario would be manageable and would minimize customer disruption.

As one of a limited number of wireline providers that ports numbers on Sunday, Comcast is comfortable with the process to manually reissue its transactions in the unlikely event that a catastrophic failure occurs *after* cutover to the new NPAC vendor.¹ Despite the low likelihood that a

¹ “Rollback” is only relevant for a 24-hour period after the transition to the new vendor has been consummated. During this period, data integrity issues should be limited as well because the current vendor will not receive data electronically from the new vendor in the event of a manual rollback – rather they will receive reissued transactions from a limited number of service providers (*i.e.*, those that perform ports on Sundays). If the transition does not complete in the first instance, it is our understanding that there will be a “failback” to the current vendor.

rollback is necessary, Comcast is amenable to engaging in *manual* rollback testing if it does not delay the transition.

Please let me know if you have any questions.

Respectfully submitted,

/s/ Beth Choroser

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