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February 28, 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.

<p style="text-align:center">*   *   *</p>

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.

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 third-party Transition Oversight Manager (TOM) continue to monitor and manage the progress of the Local Number Portability Administrator (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, 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 February 20, 2018, the completion of all mandatory industry testing against the final software release for the NPAC SMS is on the cusp of completion. Only one CMIP vendor system remains to be certified, and the patch required to resolve the sole remaining issue has already been successfully tested on a related system. All XML vendor system and required service provider testing is complete.

The NPAC solution readiness date of February 28, 2018 is on track. The planned final acceptance date of May 25, 2018 for the new NPAC remains unchanged but faces some risks. Some mechanized users are delayed in establishing and verifying connectivity to the iconectiv production NPAC. Additionally, some service providers are reporting challenges in upgrading local systems to certified versions by the required March 19, 2018 deadline. Contingency rollback also remains a concern. With the support of the FCC, the TOM facilitated the NAPM LLC, Neustar, and iconectiv in an intensive series of daily working sessions in an effort to identify a mutually-agreed approach for contingency rollback that was consistent with the May 25, 2018 final acceptance date. These sessions concluded on February 16, 2018 without agreement.

Program Dashboard

Work Stream	Current Status	Highlights
NPAC SMS Platform Build	🟢	• Data center construction and configuration is complete • Release A and Release B development is complete
User Onboarding	🟢	• 99% of NPAC users are engaged in onboarding • 1,459 NPAC users have completed registration • 50% of Enhanced Law Enforcement Platform (ELEP) entities have completed registration and service agreements

Work Stream	Current Status	Highlights
Industry Testing	🟢	• 12 CMIP vendor systems have completed certification testing and 1 remains in progress • All 4 XML vendor systems have completed certification testing • All 35 Service Provider mechanized systems have completed mandatory testing • 91 Test SPIDs across 14 organizations have engaged in Partner and Group & Round Robin voluntary end-to-end testing; all 37 test cases have been successfully completed at least three times • 10 of 12 Acceptance Test Plans have completed execution successfully, 2 are in progress, and 5 have had their final reports validated
Data Migration and Go-Live	🟡	• Data Migration Phase 3 (production cutover) agreements are complete • LEAP historical data has been transferred from the incumbent to the incoming LNPA to facilitate Ancillary Services Go-Live on March 4 • 7 SPIDs have passed connectivity tests with the iconectiv NPAC • Some mechanized users are behind schedule in establishing production connectivity to the iconectiv NPAC • Vendor software patches must be applied prior to cutover to ensure local systems reflect certification loads • Agreement has been reached on a contingency fallback approach; agreement has not been reached on a contingency rollback approach
Stakeholder Outreach	🟢	• January Transition Outreach and Education Plan (TOEP) webcast was held on 1/17 and had 224 attendees • Contingency Rollback Industry Working Session webcast was held on 1/16 and had 193 attendees • February Transition Outreach and Education Plan (TOEP) webcast was held on 2/14 and had 231 attendees • March Transition Outreach and Education Plan (TOEP) webcast will be held on 3/14 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. 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") as well as the additional NPAC features planned for Release B. At this point, all planned development and data center construction is complete.

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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 transition of these services. As Ancillary Services will go live on March 4, 2018, ELEP and WDNC users are strongly encouraged to complete their service agreements with iconectiv as soon as possible. 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 or Ancillary 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 mechanized systems are required to certify against the industry test cases to demonstrate operational compliance with the NPAC.

For the final NPAC software release, nearly all mandatory mechanized user and vendor testing has been completed successfully as of February 20, 2018. This includes all 35 Service Provider mechanized systems, 12 of 13 CMIP vendor systems, and all 4 XML vendor systems. One CMIP vendor system remains to be retested after implementing a patch that resolves an open incident, and this system is expected to be certified by the solution readiness date. Mandatory ELEP testing is underway with 1 mechanized ELEP user completing successfully, 1 in progress, and 3 users pending start. Additionally, round robin testing is in progress with 91 test SPIDs logged across 14 organizations and all 37 test cases successfully completed at least three times. While all existing PIMs are closed, one new PIM is being developed as a result of an incident raised during group testing, and a resolution path is being established that preserves the solution readiness date. In addition, execution of the 12 approved Acceptance Test Plans (ATPs) is underway with 10 ATPs complete, 5 final reports issued, and supporting artifacts reviewed on site by the TOM.

All required industry testing and ATP validation is expected to complete before the solution readiness date for the iconectiv NPAC on February 28, 2018.

Data Migration & Go-Live

Contractual agreement has been reached by NAPM LLC and Neustar regarding the data transfers required to support the ancillary services and regional migrations. Under this agreement, LEAP historical data has been transferred from the incumbent to the incoming LNPA to facilitate ancillary services go-live on March 4, 2018.

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. As of February 19, 2018, 21 of the 23 mechanized users had successfully installed all physical connections, 11 of which have also conducted the Key and Certificate Exchange. After completing all prerequisites, 7 mechanized users have successfully conducted NPAC connectivity verification. iconectiv continues to facilitate this testing in waves, which are taking place over the 5 weekends between February 11, 2018 and March 18, 2018.

To mitigate risk during the active transition period, significant effort has been spent in establishing an industry-led 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. With the support of the FCC, the TOM facilitated the NAPM LLC, Neustar, and iconectiv in an intensive series of daily working sessions in an effort to identify a mutually-agreed approach for contingency rollback that was consistent with the May 25, 2018 final acceptance date. These sessions concluded on February 16 without agreement.

It is important to differentiate between contingency rollback and fallback during the transition. Contingency rollback would occur if it were necessary to revert to the incumbent *after* the incoming LNPA commences porting. Fallback would occur if it were necessary to revert to the incumbent *prior to* the incoming LNPA commencing porting; for example, due to widespread connectivity issues. While both are unlikely, contingency rollback is considered the less likely outcome.

With respect to fallback, NAPM LLC has secured additional contractual commitments from the incumbent LNPA to resume operations if required. The commitment gap relates only to contingency rollback.

Stakeholder Outreach

The TOM is conducting outreach activities to educate and engage industry stakeholders to their obligations in supporting the transitions. These efforts include monthly TOEP meetings, which have seen increasing 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 NPAC stakeholders and allow them to provide input and feedback. The TOM hosted the January TOEP webcast on January 16, 2018, which was attended by 224 participants and the Contingency Rollback Industry Working Session webcast on January 17, 2018, which was attended by 193 attendees. The TOM supported a LNPA Transition Panel at the NARUC Winter Policy Summit on February 12, 2018. The TOM also hosted the February TOEP webcast on February 14, 2018, which was attended by 231 participants.

Program Risks

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

- Disagreements with the incumbent LNPA about the TOM's authority to ensure transition readiness are leading to challenges with data migration quality verification and contingency rollback planning;

- Lack of agreement between the incumbent LNPA and the NAPM LLC regarding the incumbent LNPA's 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.

- 2 of the 23 mechanized Service Providers and Service Bureaus are behind schedule for establishing production connectivity with the new NPAC; and

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- All mechanized Service Providers must install any required vendor patches by 3/19 to ensure access to the iconectiv NPAC through a certified vendor system; 1 mechanized Service Provider has indicated risks in meeting this timeline.

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,

- Ensure you have applied any patches/updates corresponding to the software that your vendor certified,

- If you are a mechanized user, establish production connectivity and complete key exchanges with the new NPAC *as soon as possible*,

- Participate in ad hoc and round robin testing, and

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

Coming in the next month

By February 28, 2018, all required industry testing and vendor certification is expected to be complete. The ATPs are also expected to be complete by this date. Both support the expected achievement of Solution Readiness on February 28, 2018.

On March 4, 2018, iconectiv Ancillary Services will go-live, and users will begin to access ELEP and WDNC using iconectiv systems. The TOM will host the next TOEP webcast on March 14, 2018 at 3:00 PM ET. Additionally, mechanized user connectivity verification will continue through March 18, 2018.

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

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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.

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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*).

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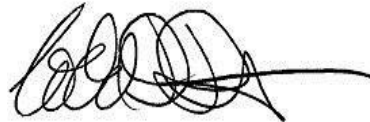
Neustar

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

Sincerely,

Todd D. Daubert
Counsel to the NAPM LLC

Appendix A: Additional Transition Information, Status and TOM Activities Since the Last Report

- 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 Specification (FRS):

  - 12 have been completed by the incoming LNPA and successfully tested (+12 since last report);
  - 2 have been completed by the affected vendor and were successfully tested (+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);
    - 12 SUTs have been certified as of 2/16 (+7);
    - 1 SUT continues to test as of 2/16 (-7);
    - 11 new incidents were identified, 32 were resolved, and 1 remains open; and
  - XML Vendor Certification Testing
    - All 4 SUTs have completed certification as of 2/16 (+3);
    - 18 new incidents were identified, 25 were resolved; and 0 remain open; and
  - Mechanized User Testing
    - All 35 SUTs have completed their mandatory testing as of 2/16 (+9);
    - 1 new incident was identified, 2 incidents were closed and 0 remain open; and
  - ELEP Testing
    - 1 Mechanized ELEP user has completed mandatory testing with no incidents reported;
    - 1 Mechanized ELEP user has begun mandatory testing with no incidents reported to date;
    - 3 Mechanized ELEP users have yet to start mandatory testing;
    - 5 ELEP users have completed optional ELEP GUI testing; and
  - LTI User Testing
    - 30 LTI users are currently executing testing (+9);
    - 1 LTI user is preparing to test (-1); and
  - Partner and Group & Round Robin Testing
    - 14 participating organizations;
    - 91 Test SPIDs logged;
    - 85 Test SPIDs connected to Testbed 1; 6 are pending connection;
    - All 37 test cases have been successfully executed at least three times;
    - 30 of the 37 test cases have been successfully executed at least 5 times;
    - 10 SPID pairs have reported results;
    - 3 group and round robin test groups have been established, 2 of which successfully executed end-to-end test cases;
    - 1 incident was opened during Round Robin testing and is being addressed by the incoming LNPA

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

- Incoming LNPA continued to onboard users to its new NPAC platform. Current onboarding status as of 2/16 indicates:

    - ~99% of SP/SB/PTRS users have started onboarding (+3%), and 1,459 NPAC users have completed registration (+50);
    - 555 WDNC entities have started registration (+177), and 228 have completed registration (+41);
    - 95% of ELEP entities have responded to outreach (+5%), and 50% have completed registration (+23%); and
    - Public Safety / IVR registration has launched in all 50 states (no change), and 1550 have completed registration (+444)

- Confirmed that 21 of the 23 Service Providers have installed and connected production circuits (+9), 7 of which have successfully completed connectivity verification testing; and

- 11 of 12 parallel operations term sheets have been finalized (Data Migration P1/P2, CMA, IVR, Ancillary Services, Help Desk, NUA/NUE, Industry Calls & Notifications, SPID, MUMP, Website Migration, and Data Migration P3)