



March 5, 2018

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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

Dear Ms. Dortch:

On March 1, 2018, B. Lynn Follansbee, USTelecom spoke by phone with Amy Bender, Legal Advisor to Commissioner O’Rielly and a separate but similar conversation with Jamie Susskind, Legal Advisor to Commissioner Carr, on March 5, 2018, to discuss the current status of the Local Number Portability Administrator (LNPA) transition.

During the calls, USTelecom expressed its commitment and optimism to seeing the LNPA transition occur on time through an efficient and effective process. As the LNPA transition nears a critical milestone, with the first regional cutover scheduled to occur on Sunday, April 8<sup>th</sup>, USTelecom expressed its concern that discussions about the contingency rollback plan between the Transition Oversight Manager (TOM), NAPM, LLC, Neustar and iconectiv have broken down despite the availability of a well-thought contingency roll back plan initially developed by the TOM and iconectiv, with participation and input provided by Neustar, and ultimately accepted by the NAPM, LLC.<sup>1</sup> USTelecom noted that it is critical that the contingency rollback plan be agreed upon by all parties to the transition as soon as possible so that the transition can continue without delay. USTelecom expressed its position that the transition should occur on time and is confident in its success based on the reports of the TOM.

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<sup>1</sup> See e.g., Letter from Todd D. Daubert, Counsel to the NAPM, LLC, to Marlene Dortch, Secretary, FCC, CC Docket, 95-116, WC Dockets Nos. 09-109 & 07-149, Attachment at 1-2 (filed Jan. 29, 2018 (filing document at request of the Transition Oversight Manager); Letter from Thomas J. Navin, Counsel to Neustar, Inc., to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket Nos. 09-109 & 07-149, Attachment A, at 2 (filed Jan. 16, 2018).

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Please contact the undersigned should you have any questions.

Respectfully submitted,

USTELECOM ASSOCIATION



By: \_\_\_\_\_  
B. Lynn Follansbee  
Vice President – Law & Policy

cc: Amy Bender  
Jamie Susskind