



March 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 Cloud Communications Alliance (“CCA”) to urge the Federal Communications Commission (“Commission”) to ensure that there is a viable and tested contingency rollback plan before the LNPA Transition begins on April 8, 2018.

The CCA is an alliance of next generation, cloud-based communications service providers to businesses. All CCA member companies have a common interest in the core value of robust innovation and competition. It is the goal of this alliance to showcase the value they deliver through innovative technology that enables businesses to communicate efficiently and effectively utilizing IP and cloud-based systems. CCA companies encourage policymakers to establish a regulatory framework that incentivizes continued growth that in turn creates high-tech, communications-based jobs and that maximizes choice to residents and businesses. CCA members provide service to millions of users and have a vital responsibility to uphold and thus a keen interest in ensuring that the LNPA transition occurs smoothly and flawlessly.

To that end, CCA appreciates Chairman Pai’s recognition of the necessity of having a viable rollback plan established before the LNPA Transition begins.¹ CCA strongly supports Chairman Pai’s February 2nd letter requiring further negotiation of a viable rollback plan,

¹ See Letter from Chairman Ajit Pai to Lisa Hook, President and CEO of Neustar, Inc. *et al.*, CC Docket 95-116 (Feb. 2, 2018).

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including robust testing and well-publicized processes and procedures. Notwithstanding the comments of iconectiv and others, the lack of a workable, tested contingency rollback plan creates an unacceptable risk. The North American Portability Management LLC's ("NAPM LLC") February 28, 2018 transition status report notes that the transition continues to "face[] some risk," and concludes that the lack of a contingency rollback "remains a concern."² The NAPM LLC further reports that, despite the efforts of the FCC and Transition Oversight Manager ("TOM"), the NAPM LLC, iconectiv and Neustar failed to reach agreement on a rollback process.

CCA does not agree with USTelecom that the manual contingency rollback plan previously proposed by iconectiv and endorsed by NAPM, LLC, was a viable rollback plan.³ Neustar describes this manual approach as "unreliable, unworkable and untested."⁴ In addition, because it is a manual plan, it does not accommodate the limited resources of smaller providers. 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.⁵

It is unfortunate that the primary parties have been unable to reach agreement on an automated tested plan and the CCA respectfully calls on the FCC to once again make every effort quickly to facilitate an agreement. Given the consequences of a failure, if such a plan cannot be agreed to and implemented on the existing Transition schedule, CCA urges the FCC to delay the implementation until such time that a proper rollback plan, including testing, is in place.

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

Respectfully Submitted,

/s/ Joe Marion

Joe Marion
President

cc:

² Letter from Todd Daubert, Counsel for the NAPM LLC, to Ms. Marlene Dortch, Secretary, FCC, CC Docket 95-116 (Feb. 28, 2018).

³ See Letter from B. Lynn Follansbee, Vice President, Law & Policy, USTelecom to Ms. Marlene Dortch, Secretary, FCC, CC Docket 95-116 (Feb. 6, 2018) ("USTelecom Letter").

⁴ Letter from Thomas Navin, Counsel for Neustar Inc., to Ms. Marlene H. Dortch, Secretary, FCC, WC Dockets 07-149 & 09-109, CC Docket, 95-116 (Feb. 23, 2018).

⁵ In addition, despite USTelecom's claim to the contrary, see USTelecom Letter at 2, although 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.