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March 8, 2018

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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:

By this letter, Verizon provides the Commission with an update of its transition efforts to date and joins Comcast in expressing support for the NAPM, LLC's transition plan,<sup>1</sup> including its plan for managing a "manual" rollback solution in the unlikely event that a catastrophic failure occurs after the cutover to iconectiv.

Overall, Verizon has experienced positive results in all areas of testing thus far, and we expect to continue testing to ensure that our platforms are well positioned for the expected transition phases. First, Verizon has actively participated in the industry level testing of the iconectiv LNP solution. The testing has been significant and aggressive, covering among other things: general platform validation, porting across service providers, performance, and disaster recovery. Most of these test scenarios are either complete or near the end of validation and, from Verizon's perspective, have no outstanding test failure cases. Verizon has also partnered with several major service providers to perform testing, all of which has been successful to date. In fact, the results of the performance tests to date has shown that the iconectiv platform, at minimum, supports "the same degree of processing and timelines" as the current NPAC provider, as required under the terms of the MSA.

Finally, Verizon is aware that iconectiv has conducted simulation techniques and system testing, and while NAPM, LLC is best positioned to address the status of contingency rollback discussions, there are active discussions under way on developing a reasonable solution that, critically, does not impact the transition timing.

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<sup>1</sup> See Letter of Comcast Corporation in WC Docket Nos. 07-149 and 09-109 and CC Docket No. 95-116 (Feb. 26, 2018).

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This letter is submitted in accordance with Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b). Please contact the undersigned if there are questions concerning this filing.

Sincerely,

A handwritten signature in blue ink, reading "Robert A. Morse". The signature is written in a cursive style with a large initial "R" and a stylized "M".

cc: Nirali Patel  
Amy Bender  
Jamie Susskind  
Claude Aiken  
Travis Litman  
Kris Monteith  
Ann Stevens  
Marilyn Jones