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March 9, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
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:

AT&T submits the following to express support for completion of the Local Number Portability (“LNP”) transition without delay. As others have noted, the industry has engaged in thorough testing for more than six months of its readiness for the new NPAC transition. A “roll-back” would only be deemed necessary if a catastrophic event occurs. Given the amount of testing that has been performed, the chances of this type of event is exceptionally low.

Although a roll-back is unlikely to occur, AT&T has successfully tested its ability to move our connectivity from the new NPAC back to the Neustar NPAC in both production and test environments. This is probably the most time consuming and complex piece of any roll-back plan, manual or mechanized. We have also confirmed AT&T’s ability to re-submit transactions. This ability is already in use today to correct out-of-synch conditions. Additionally, to ensure that initially only a minimum number of ports would be impacted should something go wrong, any mass porting jobs within AT&T will be suspended on the day of the transition.

Based on the abilities that exist today to resubmit ports and the testing that has been completed proving the ability to swing connections between the two NPACs, it is AT&T’s opinion that the manual roll-back plan developed by the Transition Oversight Manager and agreed to by the NAPM, LLC, is a workable contingency roll-back approach. AT&T therefore believes there is no reason to delay the transition.

Should you have any questions regarding the above or the attached, please feel free to contact me directly.

Sincerely,

A handwritten signature in cursive script that reads "Jacquelyne Flemming".