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VIA ECFS

March 9, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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:

CenturyLink joins AT&T, Comcast, Verizon and others in reiterating the importance and value of completing without delay the transition of Local Number Portability. The company joins AT&T, Comcast, Verizon and other parties that remain committed to a timely transition of Local Number Portability.

A broad, strong consensus supports timely implementation of the NAPM, LLC transition plan. The plan reflects contributions of key personnel from the industry's leading companies – people who understand the technical requirements and appreciate the importance of service quality for consumers. The industry has been testing for months and is moving forward with timely implementation. CenturyLink successfully completed its certification testing, and its connectivity testing is well underway and remains on track to enable timely and successful implementation of the plan. It is confident in its readiness for the new NPAC and, based on its extensive industry coordination with other parties, it is confident in the readiness of the industry as a whole.

CenturyLink is also confident in the transition plan's roll-back solution if there is any major systemic failure after the upcoming cut-over in administration from Neustar to iconectiv. Indeed, processes are already in place for resubmission of orders whenever LNP problems arise. Consequently, there is no reason to artificially delay the transition from Neustar to iconectiv, an overdue change that will bring savings to the industry. Additionally, the first regional cutover was timed to minimize complexity and add service providers progressively, increasing porting

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activity gradually until fully operational. All of this has been detailed in the transition plan and communicated through the Transition Outreach and Education Plan.

The industry's largest concern and the transition's highest risk factor is the potential for failure of the incumbent LNPA to cooperate, including with any short-term industry-led "rollbacks" that may be necessary. The Commission can help ensure the transition's success and a seamless transfer of LNP functions by noting the importance of all parties to work cooperatively and by maintaining its longstanding commitment to the transition to a new and competitively awarded administrator.

Sincerely,

/s/ John E. Benedict

cc: Nirali Patel
Amy Bender
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