



Scott R. Freiermuth
Counsel, Government Affairs
Federal Regulatory

Sprint Corporation
6450 Sprint Parkway
KSOPHN0304 – 3B521
Overland Park, KS 66251
O: 913-315-8521
scott.r.freiermuth@sprint.com

March 13, 2018

Via Electronic Submission

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

**Re: Ex Parte Letter
Telephone Number Portability, *et al.*,
WC Docket Nos. 07-149 and 09-109; CC Docket No. 95-116**

Dear Ms. Dortch:

Sprint Corporation (“Sprint”) wishes to provide the Commission with its perspective regarding the impending transition of the Local Number Portability Administrator (“LNPA”) from Neustar, Inc. to iconectiv. As with several other carriers including Comcast, Verizon, AT&T, CenturyLink and Frontier, Sprint joins in voicing its opinion that the LNP transition should proceed according to schedule, and, importantly, *without delay*.

First, Sprint’s testing to date has been successful. Sprint has conducted NPAC connectivity testing in a production environment and is able to move, without issue, between Neustar and iconectiv. This is important should a roll-back be necessary. Sprint has also tested successfully its internal platforms to ensure they are working with iconectiv’s. And, Sprint has engaged in a variety of industry-level testing including 1:1 partner testing and group, round-robin testing. In short, Sprint’s testing has given it confidence that the transition to iconectiv will be a success.

Second, Sprint believes there is a very low likelihood of a catastrophic failure that would necessitate a manual, roll-back. Nevertheless, Sprint has confidence in the contingency plan developed by the Transition Oversight Manager. As mentioned, Sprint has also tested successfully its ability to switch from iconectiv’s NPAC to Neustar’s NPAC should a manual roll-back be necessary.

Finally, Sprint notes that the LNP transition was designed to limit exposure should any issues arise during the cutover. The Southeast NPAC region is scheduled for cutover from Neustar to iconectiv on Sunday, April 8, 2018. It is timed to be on a Sunday when port volumes are lowest. The industry also chose to implement the transition in stages with just one region set to transition initially. Some carriers, including Sprint, will also take measures to delay/suspend large port transactions until after the cutover is complete (*i.e.*, Sprint will avoid mass porting jobs during the cutover).

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.

Respectfully submitted,

/s/ Scott R. Freiermuth

Scott R. Freiermuth
Counsel, Government Affairs
Federal Regulatory

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