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March 14, 2018

VIA ELECTRONIC FILING

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:

T-Mobile USA, Inc. (“T-Mobile”)¹ writes to express agreement with the views expressed by a variety of service providers that support the current schedule for the Local Number Portability Administration (“LNPA”) transition without delay.²

T-Mobile has been actively monitoring and testing its readiness for the new Number Portability Administration Center (“NPAC”). Like other service providers, T-Mobile has conducted multiple test cases and has participated in industry round-robin testing with other service providers. The results of the testing have been positive with no outstanding test cases in a failed state.

Given the significant positive testing conducted by T-Mobile, as well as other service providers, we are optimistic that transition to the new LNPA will be successful. Accordingly, T-Mobile agrees with the opinions conveyed by other carriers that there is a low likelihood of a catastrophic failure that would necessitate the need for a contingency roll-back to the Neustar NPAC. However, in such an unlikely event, T-Mobile is prepared through its service bureaus

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded corporation.

² See, e.g., Letter from Beth Chororser, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos 07-149, *et al.* (filed Feb. 26, 2018); Letter from B. Lynn Follansbee, USTelecom, to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos 07-149, *et al.* (filed March 5, 2018); Letter from Robert G. Morse, Verizon, to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos 07-149, *et al.* (filed March 8, 2018); Letter from Jacquelyne Flemming, AT&T Services, Inc., to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos 07-149, *et al.* (filed March 9, 2018); Letter from John E. Benedict, CenturyLink, to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos 07-149, *et al.* (filed March 9, 2018); and Letter from Scott R. Friermuth, Sprint, to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos 07-149, *et al.* (filed March 13, 2018).



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and ancillary processes to implement the contingency plan developed by the Transition Oversight Manager, and T-Mobile has also successfully tested its ability to connect to the new NPAC and re-establish connectivity to the Neustar NPAC.

T-Mobile will support porting on Sunday, April 8 and throughout the transition. However, we will be taking steps in concert with other carriers to reduce any significant volume-based porting during such key time periods.

For these reasons, T-Mobile believes there is no reason to delay the LNPA transition.

Please feel free to contact me with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michele K. Thomas'.

Michele K. Thomas,
Senior Director, Counsel, State Regulatory
Affairs