Todd D. Daubert
Partner

todd.daubert@dentons.com
D +1 202 408 6458

大成 DENTONS

October 31, 2017   **VIA ECFS**

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Secretary Dortch:

The North American Portability Management LLC (the "NAPM LLC"), by its attorneys, hereby files a written summary of the NAPM LLC's status updates to the Federal Communications Commission ("FCC" or "Commission") regarding the transition from the current local number portability administrator ("LNPA"), Neustar, to the new LNPA, Telcordia d/b/a iconectiv (the "Report").[1] This Report updates the FCC, the public, and all interested stakeholders regarding transition activities to date in accordance with requirements of the LNPA Selection Order[2] and guidance received from the FCC on June 24, 2015.[3] The NAPM LLC will continue to file written updates of this Report with the FCC at the end of each month until transition is complete.

Transition Oversight Plan

The Transition Oversight Plan ("TOP"), dated August 31, 2015, was edited and refiled December 5, 2016, and the TOP is published on the public portion of the NAPM LLC's website at www.NAPMLLC.org.[4] Although one or more transition milestone dates may be adjusted as appropriate to mitigate risk, the previously published dates remain accurate, and the transition is currently on track to meet the Final Acceptance Date of May 25, 2018.

---

[1]   This Report is intended to provide an update with respect to events that occurred during the prior month. Although the monthly Reports may, at times, reflect certain developments that occurred between the end of the month for which the Report is filed and the date upon which the draft Report received final approval by the NAPM LLC for filing with the Commission, the Reports generally do not reflect all developments that occur during the month in which the Report is filed, which will be reflected in the Report for the following month. Please review previous Reports for information about previous developments.

[2]   *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116, ¶¶ 158-59 (rel. Mar. 27, 2015) (*LNPA Selection Order*).

[3]   This summary reflects information relevant to the transition as managed by the NAPM LLC with the assistance of the TOM and the oversight of the Commission.

[4]   *See* https://www.napmllc.org/Docs/npac/ref_docs/08%2031%2015%20-%20Updated%20Transition%20Oversight%20Plan.pdf.

大成 DENTONS

Ms. Marlene H. Dortch
October 31, 2017
Page 2

大成 **Salans FMC SNR Denton McKenna Long**
dentons.com

Stakeholder Outreach and Education

Since the last Report, the Transition Oversight Manager (the "TOM") completed the following outreach and education activities:

- Hosted the September TOEP webcast on September 6, 2017 which was attended by 190 participants; and

- Distributed reminders to register for the mechanized user focused contingency rollback session on October 3, 2017 and the October TOEP webcast on October 11, 2017.
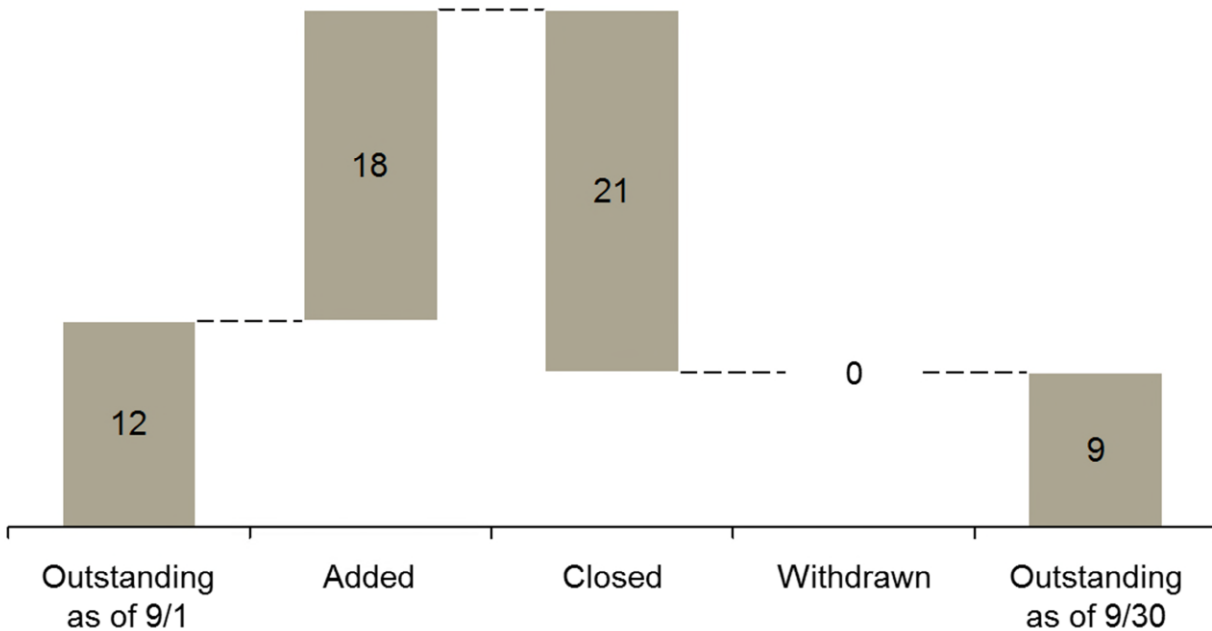
TOM Transition Activities

The TOM continued to advance the objectives of the LNPA transition program in September. The accomplishments in September include:

- Monitored industry testing of the new Number Portability Administration Center (NPAC) against the test criteria established in the certification test plans defined by the LNPA Working Group and the acceptance test plans that were reviewed and approved by the NAPM LLC in coordination with the FCC, and the summary results include:
  - Vendor Certification Testing
    - 13 systems under test (SUTs) are being certified. One of the previously reported 14 SUTs was withdrawn because it is no longer in use;
    - 5 SUTs have completed certification as of September 22, 2017; and
    - Confirmed the resolution of 9 vendor testing incidents, 28 remain open as of September 29, 2017.
  - Mechanized User Testing
    - 15 SUTs have started testing as of September 22, 2017;
    - 3 SUTs have completed mandatory testing as of September 22, 2017; and
    - Confirmed the resolution of 4 mechanized user testing incidents, 14 remain open as of September 29, 2017.
  - Low-Tech Interface (LTI) Testing
    - 3 LTI users have completed testing;
    - 5 LTI users are currently testing; and
    - 3 LTI users are preparing to test.

- 14 Problem Identification & Management forms (PIMs) were submitted and resolved in part through the LNPA WG. iconectiv agreed to address 12 PIMs and one vendor agreed to ensure certification against 2 remaining PIMs. These PIMs and accompanying change orders address all of the non-conformities and ambiguous requirements identified in Release A vendor testing, and, once fully implemented, will ensure compliance to the Functional Requirements Specifications (FRS);

- Verified that 52 of 58 Industry Methods and Procedures (M&P) were approved and 3 are under review;

- Secured NAPM approval of the updated Data Migration Acceptance Test Plan (ATP) and facilitated FCC review of the Disaster Recovery and Pooling Administrator System (PAS) ATPs;

- Continued attempts to complete the onboarding process for the one remaining mechanized user; swift onboarding for this user is critical so that its customers have an opportunity to test, and so that this mechanized user can begin and complete testing before test beds are updated for Release B;

- Worked with stakeholders to define the industry-led contingency rollback process, consolidated industry feedback and posted responses to rollback questions on the npamllc.org site; and

- Developed and facilitated stakeholder review in preparation for the mechanized-user-focused contingency rollback session on October 3, 2017 at 3:30 PM EDT. This session is the third in a series of industry working sessions that are enabling transition stakeholders to further understand and plan for industry-led rollback, including schedules, supporting materials and aids, and testing plans.

The TOM conducts weekly meetings with the NAPM LLC Transition Team, iconectiv and Neustar to coordinate activities and communication across the parties and address ad hoc issues as they arise. These working meetings are used to identify, discuss and close tasks (A.K.A. action items) required to advance the project objectives. The graph below depicts the progress achieved in addressing these action items since the last monthly report.

Transition Action Item Progress (9/1/17 through 9/30/17)

The TOM continues to track the status of the development of the new NPAC and, generally development is on track. In conjunction, the TOM has identified the following primary categories of LNPA transition risks:

- Lack of agreement on the contractual obligations to govern parallel operations. In particular, the lack of agreement by the current LNPA to resume NPAC operations in the event of an industry-led rollback remains a point of particular concern;

大成 DENTONS

Ms. Marlene H. Dortch
October 31, 2017
Page 4

大成 Salans FMC SNR Denton McKenna Long
dentons.com

- The continued delay in onboarding of the only remaining mechanized service bureau threatens the mechanized user testing schedules; the TOM has engaged the parties to reach resolution. While substantial progress has been made in September, the onboarding process is not complete at the time this report was prepared;

- The Release B schedule contains little remaining buffer against additional delays and/or development activities arising from testing issues or additional future discoveries of ambiguously or undocumented NPAC features; and

- Issues discovered with one vendor during industry testing requires remediation and regression testing that stress already tight development and testing schedules.

iconectiv

On July 25, 2016, the FCC released a final decision approving the recommendation of the NANC that iconectiv serve as the next LNPA and the terms and conditions of the draft Master Services Agreement ("MSA") that the NAPM LLC and iconectiv had previously submitted to the FCC.[5] On August 8, 2016, the NAPM LLC and iconectiv executed the MSA. On September 21, 2016, iconectiv held the first of several planned LNPA Transition onboarding webcasts for Service Providers, Service Bureaus and Providers of Telecom Related Services. In addition, iconectiv is moving forward with meeting the requirements and deadlines set forth in the Master Services Agreement.

iconectiv continued to on-board users to its new NPAC platform. Current on-boarding status as of September 29, 2017 shows:

- ~81% of SP/SB/PTRS users have started on-boarding and 1,182 NPAC users have completed registration;

- 12 of 13 Service Bureaus have completed on-boarding;

- All LSMS and SOA vendors have executed the vendor testing and confidentiality agreements;

- 168 WDNC entities have started registration and 31 have completed registration;

- 83% of ELEP entities have responded to outreach and 11% have fully registered; and

- Public Safety / IVR registration was launched in 29 states and 548 have completed registration.

For information from iconectiv about the NPAC transition, please send an email to **LNPA-ACCT-MGMT@iconectiv.numberportability.com**
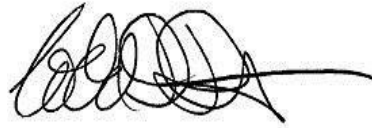
Neustar

Neustar began billing industry service providers on their December 2015 monthly Statement of Work ("SOW") invoices for transition service support billable since July 2015, consistent with the terms of SOW 97. In addition, the four-way non-disclosure agreement, which facilitates joint vendor meetings to discuss transition related issues, was signed by Neustar, the NAPM, the TOM, and iconectiv on February 2, 2017. Lastly, Neustar has executed the appropriate User Agreement with iconectiv, and is taking steps to complete the vendor on-boarding process.

---

[5]   *See Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (rel. July 27, 2015) (*LNPA Approval Order*).

*   *   *

Please contact the undersigned if you have any questions or would like any additional information about the issues discussed herein.

Sincerely,

Todd D. Daubert
Counsel to the NAPM LLC

大成 DENTONS

Ms. Marlene H. Dortch
October 31, 2017
Page 6

大成 Salans FMC SNR Denton McKenna Long
dentons.com

Appendix A: Overall Transition Status Dashboard

NPAC SMS Platform Build	🟡	• Data center construction and configuration is complete ahead of planned October end point • Release A development is complete • Release B development is code complete for planned functionality, but minimal buffer remains to accommodate new requirements
Outreach and On-boarding	🟢	• 81% of SP/SB/PTRS NPAC users representing 86% of SPIDs are engaged in on-boarding process • 1,182 users have completed registration • 31 WDNC entities have completed registration • 11% of ELEP entities have registered
Industry Testing	🟡	• 9 Acceptance Test Plans (ATP) have been approved in coordination with the FCC • Industry testing is in progress; CMIP vendor testing is nearly complete and service provider testing has started with 3 SUTs complete • Vendor testing has surfaced issues, which are requiring longer than planned timeframe to resolve
Data Migration and Go-Live	🟢	• Finalizing parallel operations requirements • Conducting Phase 2 data migration testing