

March 30, 2018

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).<sup>1</sup> 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<sup>2</sup> and guidance received from the FCC on June 24, 2015.<sup>3</sup> 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](http://www.NAPMLLC.org).<sup>4</sup> Although one or more transition milestone dates may be adjusted as appropriate to mitigate risk, the

<sup>1</sup> 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.

<sup>2</sup> *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*).

<sup>3</sup> 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.

<sup>4</sup> See [https://www.napmlc.org/Docs/npac/ref\\_docs/08%2031%2015%20-%20Updated%20Transition%20Oversight%20Plan.pdf](https://www.napmlc.org/Docs/npac/ref_docs/08%2031%2015%20-%20Updated%20Transition%20Oversight%20Plan.pdf).

previously published dates remain accurate, and the transition is currently on track to meet the Final Acceptance Date of May 25, 2018.




### **Executive Summary**



The NAPM LLC and its third-party Transition Oversight Manager (TOM) continue to monitor and manage the progress of the LNPA transition between the incumbent LNPA and the incoming LNPA. This includes the development of the Number Portability Administration Center Service Management System (NPAC SMS) platform; systems testing with service providers, vendors, and providers of telecommunications-related systems (PTRS) as well as public safety and other users; onboarding of NPAC users and ancillary services users including law enforcement entities and telemarketers; execution of the data migration and go-live events; and outreach to stakeholders and the public.

As of March 21, 2018, all mandatory industry testing against the final software release for the NPAC SMS is complete. All CMIP and XML vendor system and required service provider testing is complete.

The NAPM LLC approved NPAC solution readiness on February 28, 2018. The planned final acceptance date of May 25, 2018 for the new NPAC is on track, but contingency rollback still lacks a plan agreed by all stakeholders. With the support of the FCC, the TOM facilitated the NAPM LLC, Neustar, and iconectiv in an intensive series of daily working sessions in an effort to identify a mutually-agreed approach for contingency rollback that was consistent with the May 25, 2018 final acceptance date. These sessions concluded on February 16, 2018 without agreement. Subsequently, the NAPM LLC put forward an additional proposal for enhanced testing to support rollback, which was ultimately not initiated.

### **Program Dashboard**

Work Stream	Current Status	Highlights
NPAC SMS Platform Build		<ul style="list-style-type: none"> <li>Data center construction and configuration is complete</li> <li>Release A and Release B development is complete</li> <li>NPAC Solution Readiness was approved on February 28</li> </ul>
User Onboarding		<ul style="list-style-type: none"> <li>99% of NPAC users are engaged in onboarding</li> <li>1,487 NPAC users have completed registration</li> <li>After the March 4 launch of Ancillary Services, new WDNC and ELEP/IVR users are being on-boarded through business-as-usual processes</li> </ul>
Industry Testing		<ul style="list-style-type: none"> <li>All mandatory industry testing is complete</li> <li>Voluntary Ad-Hoc, Partner, Group and Round Robin industry testing progress includes: <ul style="list-style-type: none"> <li>All partner test cases have been successfully completed at least four times</li> <li>3 issues raised as PIMs to LNPA TOSC</li> </ul> </li> <li>All 12 Acceptance Test Plans (ATPs) have been approved, successfully executed, and validated.</li> </ul>

Data Migration and Go-Live		<ul style="list-style-type: none"> <li>• WDNC and ELEM/IVR services successfully launched on March 4 and were accepted on March 16</li> <li>• A few mechanized users are behind schedule for verifying production connectivity to the iconectiv NPAC</li> <li>• Agreement has been reached on a fallback approach</li> <li>• The NAPM LLC proposed optional enhanced testing to support industry-led rollback, which was ultimately not initiated</li> <li>• Final preparations are underway for the Southeast regional migration</li> <li>• A migration dry run was conducted on March 18</li> </ul>
Stakeholder Outreach		<ul style="list-style-type: none"> <li>• March Transition Outreach and Education Plan (TOEP) webcast was held on March 14 and had 221 attendees</li> <li>• The next Transition Outreach and Education Plan (TOEP) webcast for Southeast Cutover Preparation will be held on April 4 at 3PM ET</li> <li>• April Transition Outreach and Education Plan (TOEP) webcast will be held on April 18 at 3PM ET</li> </ul>

### **NPAC SMS Platform Build**

The development of the hardware and software for the new NPAC SMS platform is critical to ensuring the new NPAC meets all requirements. Each software version undergoes rigorous quality assurance testing before being released to industry testers. These activities include detailed development verification, the execution of thousands of multi-step test scenarios to ensure conformity to the Functional Requirement Specification, and internal execution of all applicable industry test cases. The final version of the NPAC SMS Platform (Release B) completed iconectiv quality assurance and was provided to industry for testing on December 18, 2017. This software included fixes for issues that surfaced in the industry testing of the initial software code (Release A) as well as the additional NPAC features in Release B. All planned development and data center construction is complete, and NPAC solution readiness was confirmed by the NAPM LLC on February 28, 2018.

### **User Onboarding**

Onboarding is required for users to port or otherwise make use of the new NPAC and its ancillary services as well as to take part in testing activities. Onboarding of NPAC users is progressing well with the vast majority of service provider, service bureau, and PTRS users having completed registration. As Ancillary Services launched on March 4, 2018, new ELEM/IVR and WDNC users are being on-boarded by iconectiv per business-as-usual processes. The TOM, iconectiv, and FCC continue to engage users and promote their onboarding as the transition date approaches. In late December 2017, iconectiv provided a list of NPAC users that have not registered to the FCC. Users that have not completed onboarding before the transition will not have access to the NPAC.

### **Industry Testing**

Industry testing allows carriers to determine if their systems used for managing porting transactions will function properly. Testing is mandatory for mechanized users and optional for those interfacing through other interfaces. Vendors of mechanized systems are required to certify against the industry test cases to demonstrate operational compliance with the NPAC.

For the final NPAC software release, all mandatory mechanized user and vendor testing was completed successfully as of solution readiness on February 28, 2018. This includes all 35 Service Provider mechanized systems, all 13 CMIP vendor systems, and all 4 XML vendor systems. Additionally, voluntary partner, group, and round robin testing is in progress with 119 test Service Provider Identifications (SPIDs) logged across 17 organizations, and all 37 test cases successfully completed at least four times. Ad hoc testing is also in progress and incidents opened have resulted in 3 new PIMs. These and other open issues do not affect the transition final acceptance date. iconectiv plans on informing registered users of known potential impacts and service differences between the NPACs with recommended mitigation actions via cross-regional email bulletin by March 28, 2018.

Execution of all 12 approved Acceptance Test Plans (ATPs) was successfully completed and reviewed by the TOM and NAPM Security Advisory Council by the Solution Readiness date of February 28, 2018.

### **Data Migration & Go-Live**

Contractual agreement has been reached by NAPM LLC and Neustar regarding the data transfers required to support the ancillary services and regional migrations. Under this agreement, LEAP historical data has been transferred from the incumbent to the incoming LNPA that facilitated the successful launch of Wireless Do-Not-Call (WDNC) and Enhanced Law Enforcement Platform (ELEP) services on March 4, 2018. The incumbent provider discontinued these services on March 9, 2018.

Mechanized users of the NPAC need to ensure that their production circuits connecting to the new NPAC are established and verified in a timely manner. As of March 21, 2018, all 24 mechanized users have successfully installed physical connections to both NPAC data centers, 22 of which have also conducted the Key and Certificate Exchange. After completing all prerequisites, 21 mechanized users have successfully conducted NPAC connectivity verification testing. iconectiv continues to facilitate this testing for the remaining users and expects to complete all connectivity verification testing by March 25, 2018.

All mechanized Service Providers were able to successfully install all required vendor software patches by the March 19, 2018 deadline to ensure access to the iconectiv NPAC through a certified vendor system.

To mitigate risk during the active transition period, significant effort has been spent in establishing contingency plans, including options for "Fallback" and industry-led "Rollback". Fallback is agreed upon among the responsible parties, but formal agreement has not been reached on the Rollback option. With the support of the FCC, the TOM facilitated an intensive series of daily working sessions between the NAPM LLC, Neustar, and iconectiv in an effort to identify a mutually-agreed approach for contingency rollback that was consistent with the May 25, 2018 final acceptance date. These sessions concluded on February 16 without agreement; the NAPM LLC continues efforts to reach agreement among all parties on the Rollback plans.

During the March 14 TOEP webcast, the TOM outlined the range of webcast, bridge and email communications channels that will be used to inform stakeholders of transition progress and to collect stakeholder inputs during the regional migrations. These communications channels are detailed in the TOEP webcast materials archived on the LNPA Transition tab of the [napmllc.org](http://napmllc.org) website.

On March 18, a dry run of the Southeast Region data migration was successfully conducted to validate data transfer, data validation, and data loading activities as well as the range of internal and external communications and governance activities.

### **Stakeholder Outreach**

The TOM is conducting outreach activities to educate and engage industry stakeholders to their obligations in supporting the transitions. These efforts provide updates and context to the many NPAC stakeholders and allow them to provide input and feedback. The TOM supported the LNPA Transition Oversight Subcommittee meeting on March 6-7, 2018. The TOM hosted the March TOEP webcast on March 14, 2018, which had 221 attendees. In addition, the TOM provided a transition status report to the quarterly meeting of the North American Numbering Council at the FCC on March 16, 2018.

### **Program Risks**

The following is a non-exhaustive list of summary-level program risks pertaining to LNPA transition:

- Disagreements with the incumbent LNPA about the TOM's authority to ensure transition readiness are leading to challenges with data migration quality verification and contingency rollback planning;
- Lack of agreement between the incumbent LNPA and the NAPM LLC regarding the incumbent LNPA's obligation to resume NPAC operations in the event of an industry-led rollback remains a point of concern;
- To ensure readiness in the event of a rollback, the TOM has sponsored a regular cadence of contingency rollback planning meetings since 2015. As part of these meetings, a wide variety of potential rollback approaches were identified and evaluated on a timely basis. The industry-led approach was selected by the NAPM LLC because, in the judgment of the TOM and the NAPM, it *best* addresses technical, resource, schedule, and contractual constraints; and
- 3 of the 24 mechanized Service Providers and Service Bureaus are behind schedule for verifying production connectivity with the new NPAC.

### **Stakeholder Actions**

There are a number of actions stakeholders should take to support and facilitate the transition. They include:

- Complete registration with the new LNPA *as soon as possible*, if not already accomplished;
- If you are a mechanized user, complete key exchanges and verify connectivity and system profiles with the new NPAC *as soon as possible*;
- Participate in ad hoc and round robin testing, and
- Review distributed contingency rollback preparatory materials, such as the revised resubmission aid, and ensure your company is prepared to resubmit transactions in the event of a rollback.

### **Coming in the next month**

The TOM will host a TOEP webcast detailing Southeast regional migration preparations on April 4, 2018 at 3:00PM ET. On April 8, 2018, NPAC services for users in the Southeast region will be migrated from the incumbent to the incoming LNPA. Updates on migration status will be communicated to industry by the TOM via a WebEx dashboard, open teleconference bridge, and email. Details regarding these communications will be sent via email to the TOEP distribution list on April 5, 2018. The TOM will host a follow-up TOEP webcast on April 18, 2018 at 3:00PM ET which will include an update on the first regional migration.

Please see Appendix A for additional transition information, status and TOM activities for the past month.

\* \* \*

### **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.<sup>5</sup> 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.

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

### **Neustar**

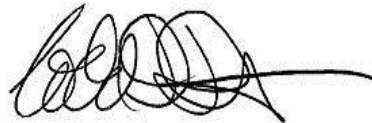
Neustar began billing industry service providers on their December 2015 monthly Statement of Work (SOW) invoices for transition service support billable since July 2015, consistent with the terms of SOW 97. In addition, the four-way non-disclosure agreement, which facilitates joint vendor meetings to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

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

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<sup>5</sup> 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*).

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

*Counsel to the NAPM LLC*



**Appendix A:** Additional Transition Information, Status and TOM Activities since the last report

- Confirmed connectivity of the Pooling Administration System with the incoming NPA
- Anonymized summary results of industry testing are being provided to monitor the status and progress of NPAC testing while protecting sensitive security and proprietary information; these results include:
  - CMIP Vendor Certification Testing
    - All 13 SUTs have been certified as of 3/21 (+1);
  - XML Vendor Certification Testing
    - All 4 SUTs have completed certification as of 3/21 (no change);
  - Mechanized User Testing
    - All 35 SUTs have completed their mandatory testing as of 3/21 (no change);
  - ELEP Testing
    - 4 Mechanized ELEP users completed mandatory testing before the launch of Ancillary Services
  - LTI User Testing
    - 33 LTI users were enrolled in the system;
    - 29 LTI users actively tested; and
    - Optional LTI testing is now included in ad hoc testing
  - Partner and Group & Round Robin Testing
    - 17 participating organizations (+3);
    - 119 Test SPIDs logged (+28);
    - 109 Test SPIDs connected to Testbed 1; 10 are pending connection;
    - All 37 test cases have been successfully executed at least four times;
    - 26 of the 37 test cases have been successfully executed at least 8 times;
    - 4 group and round robin test groups have been established and successfully executed end-to-end test cases; and
    - 1 incident was opened during Round Robin testing and has been resolved
  - Ad hoc testing is ongoing among NPAC users and incidents being raised for resolution
    - 32 incidents have been identified and have no impact on the migration
      - 6 have been closed
      - 5 to be jointly retested
      - 6 to be retested by the identifying vendor
      - 7 to be addressed via PIMs
      - 8 are being worked by both the vendor and the incoming LNPA
    - 3 new PIMs have been opened for issues noted during ad hoc testing (+3)
- Verified that 70 of 70 Industry Methods and Procedures (M&P) were approved;
- Incoming LNPA continued to onboard users to its new NPAC platform. Current onboarding status as of March 16 indicates:
  - ~99% of SP/SB/PTRS users have started onboarding (no change), and 1,487 NPAC users have completed registration (+28); and
  - Public Safety / IVR registration has launched in all 50 states (no change), and 1,891 have completed registration (+341)
- Confirmed that all 22 current mechanized Service Providers have successfully installed and connected their primary and backup production circuits (+1), 21 of these 22 have also successfully validated their connections with the incoming LNPA (+14). The 22<sup>nd</sup> current mechanized Service Provider is being scheduled for testing. Additionally, two mechanized Service Providers are not in production today; these two providers have completed their physical connections and are scheduling connectivity validations outside of the maintenance window.



- 11 of 12 parallel operations term sheets have been finalized (Data Migration P1/P2, CMA, IVR, Ancillary Services, Help Desk, NUA/NUE, Industry Calls & Notifications, SPID, MUMP, Website Migration, and Data Migration P3)