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November 16, 2017

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

      Neustar, Inc. (Neustar) submits the attached response provided today to the Transition Oversight Manager (TOM) and North American Portability Management LLC (the NPAM). This responds to the Local Number Portability Administrator transition status report.[1] Neustar's response explains how these reports fail to inform stakeholders of key elements of transition readiness. Specifically, Neustar's response expresses concerns that stakeholders have no visibility into (1) the quality and readiness of iconectiv's Number Portability Administration Center (NPAC), (2) the effect severely compressed timelines will have on testing and validation of that NPAC, and (3) the impact of the lack of an agreed-upon, viable rollback solution should the transition to that NPAC fail.

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[1]   *See* Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116; WC Docket Nos. 09-109 and 07-149 (filed Oct. 31, 2017); *see also* Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116; WC Docket Nos. 09-109 and 07-149 (filed Aug. 31, 2017); Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116; WC Docket Nos. 09-109 and 07-149 (filed Sept. 29, 2017).

Please do not hesitate to contact me if you have any questions.

Very truly yours,

/s/ Thomas J. Navin

Thomas J. Navin
Counsel to Neustar, Inc.

Neustar's Response to recent LNPA Transition Status Reports
November 16, 2017

Neustar is responding to the most recent LNPA Transition Status Reports ("Status Reports") because of the Status Reports' continued failures to provide transparency into key elements of transition readiness. As the transition dates get closer, the Transition Oversight Manager (TOM) must shed more light on how potential risks that will impact consumers will be mitigated. A challenged transition will directly impact critical service provider business operations, including but not limited to competition through retail stores and dealer channels, accurate completion of calls and texts, and customer care operations. This makes transparency an essential priority in the remaining time before transition.

Stakeholders are being given virtually no visibility into the quality and readiness of iconectiv's NPAC, and no insight into how this quality and readiness is being measured

With less than five months remaining until the first region (Southeast Region) transitions on April 8, 2018, the quality of iconectiv's NPAC system development remains unclear. The overwhelming majority of NPAC testing and validation is being performed only by iconectiv, and the TOM has provided virtually zero insight into the platform's state of readiness (except to say that development "generally is on track", with no accompanying explanation of what this means). Stakeholders[1] have not been made aware of the test criteria, target pass rates and test results being used to measure the quality and readiness of the system, which is highly irregular for a system implementation of this complexity. The Status Reports fail to disclose standard test and validation reporting that would aid the industry to understand the quality and state of readiness of the iconectiv NPAC system, such as:

1. *Quality Assurance Functional Testing Reports*: Detailed functional test results that validate the quality of iconectiv's NPAC software to support all Functional Requirement Specifications (FRS)
2. *Data Migration Validation Reports*: Detailed test results that validate the quality of iconectiv's data migration software being used to migrate all regional data
3. *Performance Test Reports*: Detailed test results that validate the performance quality of all NPAC system interfaces when processing peak transaction load volumes (i.e. millions of daily transactions)

The tests described in the Status Report, i.e. those executed to date by vendors and mechanized NPAC users, were performed against an incomplete NPAC system, and are designed to exercise only a small subset of required NPAC capabilities. In addition, the Status Report references a series of Acceptance Test Plans being performed by iconectiv, but provides no information on the scope of what is being tested, how the test is being conducted, and what are the success criteria and results. In the interests of transparency and given the limited time prior to the first regional migrations, the TOM should release all current and future information related to iconectiv's internal testing and readiness validation efforts, along with all criteria being evaluated prior to subsequent milestones. Industry representatives require this information to gauge the quality of iconectiv's NPAC system and to determine whether and how

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[1] Neustar is a participant in the LNPA transition in capacities other than its role as the incumbent provider. Neustar is also a commercial systems vendor responsible for supporting over 200 operators in their integration to the iconectiv NPAC, as well as the FCC's vendor for National Pooling Administration, provisioning millions of consumer phone numbers into the NPAC each year. A failure to smoothly transition NPAC vendors will have long-lasting cost and service impacts for all constituents, including Neustar.

iconectiv has delivered the full scope of requirements as defined in the FCC's Selection and Approval Orders.[2]

The timelines for user acceptance testing and validation of iconectiv's NPAC system functionality, methods and procedures, and LEAP services has been severely compressed

The initial NPAC transition schedule proposed by the NAPM LLC included over a year of industry testing between the iconectiv's code complete date and the first regional migration. With the numerous delays in iconectiv's software development and delivery, this allotment has been reduced to approximately ten weeks. . Since assuming oversight of the NPAC transition, the TOM has repeatedly announced delays to the system's availability for industry testing while simultaneously failing to identify or consider the resulting risks to quality and stability. Most recently, full availability of iconectiv's Release B software (presumably the code-complete version of NPAC) was delayed from October 15, 2017 to December 15, 2017. This delay has further compressed the transition's available time to conduct industry testing down to roughly two months for vendors, service providers and law enforcement agencies.

In a transition of this magnitude, without extensive validation and testing, the probability of unforeseen issues related to performance and data corruption is inevitably significant. In this case, standard industry best practices of running current and target systems in parallel, to validate system performance and data integrity prior to final cut over, is not being exercised. The current set of transition milestones does not include any steps for user participation in performance testing, or testing by users on migrated data. It is not prudent to put the industry and consumers at risk by replacing the current NPAC system, which has been operational and stable for over 15 years, with a system that has undergone only 10 weeks of full vendor, service provider, law enforcement agency and WDNC user testing. It is therefore essential that the transition leaders expeditiously engage stakeholders for acceptance testing including performance conditions, and further address data validation with the iconectiv NPAC prior to cut-over.

No viable rollback solution exists to support NPAC service restoration in the event of a failed transition caused by iconectiv NPAC system issues or data corruption resulting from data migration

Standard industry practices for complex system transitions dictate the need for a fully functioning and validated rollback process, to account for the probability of issues relating to system functionality, performance, data integrity or downstream user interfaces. The Status Reports should note a critical risk to the industry given that the only rollback process currently under consideration (a manual, service provider-led process developed by the TOM) is as yet unproven, and shifts a substantial and unreasonable amount of effort, cost, and risk onto service providers. This state of affairs introduces material burdens on service provider operations and risks the disruption of service to consumers in the event of iconectiv failures. To date, the TOM has rejected Neustar's requests to conduct a commercially reasonable testing of the manual rollback process, to validate that stable NPAC system processing and data integrity can be quickly re-established for the industry.

The Status Report fails to describe that over 12 months ago, Neustar proposed a workable and cost-effective automated rollback solution, consistent with large complex transition best practices, to achieve speed of recovery and stable porting operations for the industry. It was only after failing to respond to

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[2] *Telcordia Techs., Inc. Petition to Reform Amendment 57 & to Order A Competitive Bidding Process for No. Portability Admin*, Order, 30 FCC Rcd 3082 (2015), *aff'd sub nom, Neustar Inc. v. FCC*, 857 F.3d 886 (D.C. Cir. 2017)

Neustar's proposal for over six months that the TOM constructed their alternative manual rollback process. Neustar is continuing to advocate for a viable rollback solution which can be reasonably implemented and tested, and which provides a true safety net for service providers and consumers.

It is imperative for the industry to understand the quality and readiness of the iconectiv NPAC system. Consumers should not be subjected to impacts and disruptions caused by failures to properly assess and confirm system readiness. Service providers and other NPAC users should not be burdened with reduced testing times originating from iconectiv's failure to implement its platform on time. To expeditiously address the lack of transparency and testing limitations currently burdening the transition, the TOM should, with an independent third party if necessary, perform an audit of the iconectiv NPAC system platform and publish a comprehensive state of transition readiness to all stakeholders.