

December 29, 2016

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 the requirements of the LNPA Selection Order<sup>2</sup> and guidance received from the FCC on June 24, 2015.<sup>3</sup> In the meantime, 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 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 previously published dates remain accurate, as of the date of this letter, and the transition is currently on track to meet the Final Acceptance Date of May 25, 2018. The NAPM LLC will provide updates with respect to any subsequent changes to the relevant dates.

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<sup>1</sup> This Report is intended to provide an update with respect to events that occurred during the month of November 2016. 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).

**Stakeholder Outreach and Education**

Since the last Report, the Transition Oversight Manager (the "TOM") presented transition updates at the following events:

- National Association of Regulatory Utility Commissioners ("NARUC") annual meeting in La Quinta, California on November 13<sup>th</sup>
- NAPM LLC meeting in Dallas, Texas on November 15<sup>th</sup>
- Issued TOEP survey on November 15<sup>th</sup> with 134 participants as of November 30<sup>th</sup>; the survey concluded on December 2nd and results were shared during the December 13th TOEP webcast

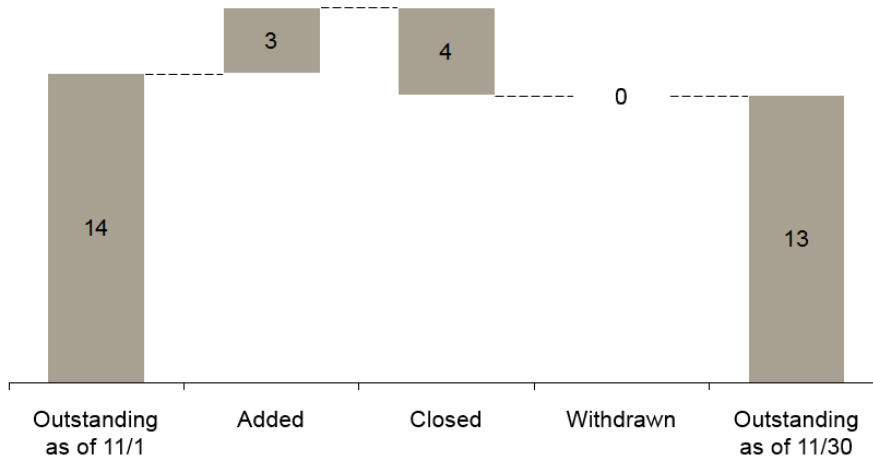
**TOM Transition Activities**

The TOM continued to advance the objectives of the LNPA transition program. Accomplishments since the last report include:

- Submitted the WDNC and Data Migration Acceptance Test Plans ("ATP") for review and approval by the NAPM in coordination with the FCC
- Reviewed and baselined the following 7 parallel operations approach documents:
  1. PAS (Pooling)
  2. CMA function
  3. New User Application
  4. Website Migration
  5. Industry Calls and Notifications
  6. SPID/MUMP Migration
  7. Helpdesk
- Reviewed Pooling Administrator API development requirements and confirmed Change Order 3B was submitted by the Pooling Administrator to the FCC for approval; suggested PA revise the Change Order to gain approval
- Verified the delivery of the November NPAC customer data from Neustar to iconectiv
- Updated and released a new version of the Transition Oversight Plan (TOP)
- Presented a quarterly transition update report to the North American Numbering Council (NANC) on 12/1/16
- Posted a list of 2017 outreach and education events on [napmlc.org](http://napmlc.org)

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 (11/1/16 through 11/30/16)



The TOM continues to track identified LNPA transition risks including the summary program risks below:

- Lack of agreement on key transition requirements has prevented certain transition plans from being finalized, examples include:
  - Governance of transition decision-making and resolution of potential disputes
  - An approach and implementation commitment for LNPA transition contingency rollback
  - Determination of appropriate contractual obligations governing contingency rollback and parallel operations
- Approval of Pooling Change Order 3b is needed for Neustar to start API-related development
- Joint-vendor interaction has been impeded by the absence of a confidentiality agreement between the current and incoming LNPA

### 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.

iconectiv continued its effort to on-board users to its new NPAC platform. Current on-boarding status as of 11/30 shows:

- ~29% of SPIDs have started the on-boarding process
- 61 users have completed on-boarding
- 9 of 12 Service Bureaus have started on-boarding
- 4 of 6 LSMS and SOA vendors have executed the Confidentiality & Testing agreements

<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*).

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For information about the NPAC transition, an email can be sent to iconectiv at [LNPA-ACCT-MGMT@iconectiv.numberportability.com](mailto:LNPA-ACCT-MGMT@iconectiv.numberportability.com).

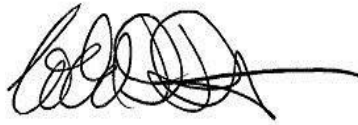
**Neustar**

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.

As more fully described in filings with the Commission by the NAPM LLC in the above-referenced dockets on November 29, 2016, and December 13, 2016 (the "Letters"), Neustar has asserted that it has no legal obligation to maintain the confidentiality of any information exchanged during any joint vendor meeting among the NAPM LLC, the TOM, iconectiv and Neustar. In order to eliminate the inefficiencies and unnecessary costs to the industry that result from the inability to conduct joint vendor meetings, the NAPM LLC continues to urge Neustar to enter into a non-disclosure agreement as explained in the Letters.

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

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end.

Partner