

December 29, 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").<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 previously published dates remain accurate, and the transition is currently on track to meet the Final Acceptance Date of May 25, 2018.

---

<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).


**Executive Summary**

The NAPM LLC and its independent, 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, systems 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 November 30, 2017, the transition is focused on industry testing against the latest software release for the NPAC SMS. The planned final acceptance date of May 25, 2018 for the new NPAC remains unchanged but faces significant risks. Several issues and vendor non-conformances related to interface specifications have been identified and require mitigation. With additional systems testing still remaining, new issues may arise that require resolution and add pressure to the program timeline.

**Program Dashboard**

Work Stream	Current Status	Highlights
NPAC SMS Platform Build		<ul style="list-style-type: none"> <li>Data center construction and configuration was completed ahead of schedule</li> <li>The final software release has been coded and is undergoing quality assurance testing per schedule</li> <li>The status of this work stream is "At Risk" because only minimal buffer remains to accommodate potential issues</li> </ul>
User Onboarding		<ul style="list-style-type: none"> <li>Over 90% of NPAC users are engaged in onboarding</li> <li>Over 1,300 NPAC users have completed registration</li> <li>19% of ELEM entities have registered</li> </ul>
Industry Testing		<ul style="list-style-type: none"> <li>All Acceptance Test Plans ("ATPs") have been approved in coordination with the FCC</li> <li>Industry testing is in progress</li> <li>The status of this work stream is "At Risk" because a few issues that require longer than expected resolution timeframes were identified during testing, and testing has determined that one vendor has significant non-conformances with the applicable specifications that must be remedied</li> </ul>
Data Migration and Go-Live		<ul style="list-style-type: none"> <li>Finalizing parallel operations requirements</li> <li>All regional data migration testing is complete, pending validation of loaded data</li> </ul>

Stakeholder Outreach		<ul style="list-style-type: none"><li>• November Transition Outreach and Education Plan ("TOEP") webcast on 11/7 with 172 attendees</li><li>• Contingency Rollback Planning webcast for small carriers on 11/29 with 138 attendees</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. This development is progressing in accordance with the revised schedule despite the additional development needed to address poorly documented NPAC requirements and specification non-conformances discovered during industry testing. However, there is little remaining buffer in the schedule to accommodate additional delays that may arise if new issues are found during testing.

### **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 providers, service bureaus, and PTRS users having completed registration. Significant progress is also being made in onboarding more law enforcement system users and other ancillary services users in advance of the March 2018 transition of these services. The TOM, iconectiv, and FCC continue to engage users and promote their onboarding as the transition date approaches.

### **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 these systems are required to certify against the industry test cases to demonstrate operational compliance with the NPAC.

For the first NPAC software release (known as "Release A"), one system vendor did not fully certify after all of the applicable test cases had been executed. Resolution of these issues is extending past the planned vendor certification window, which means some service provider testing has begun with systems that have not been fully certified. However, the resolution timing is not creating significant testing issues because only a small numbers of test cases failed and have to be temporarily bypassed until patches are applied or additional development is completed.

In November, the first portion of the final NPAC software version (known as "Release B"), was released so that XML testing could begin. Three of four vendor systems requiring certification have begun testing. Issues and requirements non-conformances that require remediation have been identified with one of the vendors. Successful completion of Release B testing is a key gate to maintaining the overall transition schedule.

Additionally, in November, preparation for round robin testing accelerated. Interested service provider testers were identified and a matching process initiated to ensure robust test coverage.

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

Preparation for the transition between LNPAs involves the testing of data migration to ensure the integrity of the data and successful cutover during the transition window. These data migration tests have spanned multiple phases and demonstrate readiness for transition.

Mechanized users of the NPAC need to ensure that their production circuits connecting to the new NPAC will be established in a timely manner. The end of year deadline has been communicated to the 22 users requiring connection, but only 10 of them are expected to meet that deadline, and some do not yet have expected circuit delivery dates, which creates additional risks for their customers.

To mitigate risk during the active transition period, significant effort has been spent in establishing a contingency rollback plan. This contingency rollback plan would be exercised in the event of a catastrophic and unrecoverable system failure within the incoming LNPA during the transition and revert porting responsibilities to the incumbent during issue resolution. However, the incumbent LNPA has yet to agree to terms that would govern the resumption of NPAC services in such an eventuality. While an incident that would trigger such a rollback is unlikely, it is still prudent to establish protocols and test them.

## **Stakeholder Outreach**

The TOM is conducting outreach activities to educate and engage industry stakeholders to their obligations and expectations in supporting the transitions. These efforts include the monthly TOEP meetings, which have seen steady attendance and diversity of stakeholders, as well as issue-related meetings such as preparation for a contingency rollback during transition. These efforts provide updates and context to the many stakeholders and allow them to provide input and feedback to the transition process. The TOM hosted the November TOEP webcast on November 7, 2017, which was attended by 172 participants, and the small service provider-focused contingency rollback session on November 29, 2017, which was attended by 138 participants. The TOM will host the December TOEP webcast on December 12, 2017 at 3PM ET.

## **Program Risks**

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

- Disagreement by the incumbent LNPA about the TOM's authority to make transition decisions as well as enforce dispute resolution are leading to issues with vendor testing issue mitigation and contingency rollback planning;
- Lack of agreement between the incumbent LNPA and the NAPM LLC regarding the incumbent LNPA's obligations with respect to parallel operations. In particular, disagreement by the incumbent LNPA regarding its 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.

- 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;
- Issues discovered during industry testing require remediation and regression testing that stress already tight development and testing schedules;
  - XML testing has surfaced issues with one vendor that is not conforming to defined interface requirements; and
- 10 of the 22 Service Providers and Service Bureaus are not expected to meet the 12/31 target for connectivity with the new NPAC.

### **Stakeholder Actions**

There are a number of actions stakeholder should take to support and facilitate the transition.

- Complete registration with the new LNPA, if not already accomplished;
- Verify certification status of your system vendor and readiness to support service provider testing;
- Urge your vendor to quickly remediate any failed test cases or instances of non-conformance with requirements as identified by the TOM;
- Ensure completion of connectivity to the new NPAC. Users of mechanized service bureaus should ensure these entities also are on track to comply with December 31 deadline;
- Participate in ad hoc and round robin testing once your system or service bureau has completed certification; and
- Review distributed contingency rollback preparatory materials, like the resubmission aid, and ensure your company is prepared to undertake required resubmissions in the event of a rollback.

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

In December, Release B testing will continue to be a key transition focus. XML vendor testing will continue, and as vendor systems certify, service provider testing will begin. The second portion of Release B is expected to be released for industry testing beginning on December 18, 2017. As timely resolution of any identified issues is essential to maintaining the transition schedule, issues related to industry testing of Release B will be raised and addressed with the TOM directing responsible parties to take action where necessary and keeping stakeholders informed of progress. Additionally, execution of the Acceptance Test Plans will begin in December with the TOM monitoring progress and results. Updates on the ATPs will be a regular part of the TOEP outreach program.

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**.

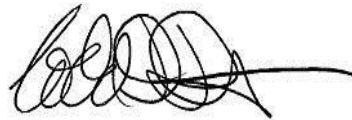
### **Neustar**

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 is taking steps to complete 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.

Sincerely,



Counsel to the NAPM LLC

---

<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*).

## **APPENDIX A: Additional Transition Information, Status and TOM Activities for the Past Month**

- Confirmed delivery of the Pooling Administrator System (PAS) API to the incoming LNPA and monitored testing of the software; 1 new incident was identified and closed;
- Confirmed progress on the 14 Problem & Issues Management forms (PIMs) arising from the vendor testing process. These PIMs and accompanying change orders address all of the non-conformities and ambiguities identified in Release A vendor testing, and, once fully implemented, will ensure compliance to the Functional Requirements Specifications (FRS):
  - 4 have been completed by the incoming LNPA and are ready for testing (no change since last month)
  - 8 are being worked by the incoming LNPA and are on track for Release B testing, beginning on December 18 (no change)
  - 2 are being worked by a vendor and are on track for vendor certification beginning on December 18 (no change);
- 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
    - 13 systems under test (SUTs) are being certified (no change)
    - 5 SUTs have been certified as of 11/30 (no change); and
    - 20 incidents remain open as of 11/30, pending resolution of the outstanding PIMs (no change)
  - XML Vendor Certification Testing
    - 3 SUTs have started testing as of 11/30 (+3); and
    - 7 new vendor testing incidents were identified and all remain open (+7)
  - Mechanized User Testing
    - 28 SUTs have started testing as of 11/30 (+4)
    - 25 SUTs have completed their mandatory testing as of 11/30 (+8)
    - 15 mechanized user testing incidents were resolved, and 14 new incidents were identified during the month of November (+5); and
    - 8 issues remain open as of 11/30 (-5)
  - Low-Tech Interface (LTI) Testing
    - 17 LTI users have started testing (+4); and
    - 2 LTI users are preparing to start testing (+2)
- Supported preparation activities for Group and Round Robin Testing by collecting system profile details of Service Providers (SPs) that will participate in testing and facilitating the process for SPs to partner with each other to execute testing;
- Verified that 57 of 58 Industry Methods and Procedures (M&P) were approved and 1 is pending submission (no change);
- Secured NAPM approval in coordination with the FCC for the Disaster Recovery and Pooling Administrator System (PAS) ATPs; and



- Incoming LNPA continued to onboard users to its new NPAC platform. Current onboarding status as of 11/24 indicates:
  - ~92% of SP/SB/PTRS users have started onboarding (+5%), and 1,340 NPAC users have completed registration (+81)
  - 269 WDNC entities have started registration (+42), and 52 have completed registration (+6)
  - 88% of ELEM entities have responded to outreach (no change), and 19% have fully registered (+4%)
  - Public Safety / IVR registration has launched in all 50 states (+9), and 907 have completed registration (+161)
- Confirmed that all 22 Service Providers have started the process to install and configure production circuits; and 1 has completed installation and configuration;
- 9 term sheets have been approved by the NAPM (Data Migration P1/P2, CMA\*, Ancillary Services, Website Migration, ICN, SPID, MUMP, Helpdesk, IVR, and NUA/NUE);
- The incumbent LNPA delivered the Phase 2 data migration on 11/15
- Facilitated the small service provider-focused contingency rollback session on 11/29, which was attended by 138 participants and covered topics including rollback process overview, governance, recommended testing, pre-transition readiness actions, review of the Resubmission Aid, and next steps.
  - This is the 4<sup>th</sup> session of a series of interactive, industry working sessions that the TOM is conducting to communicate and socialize the rollback approach, supporting mechanisms, and testing plans within the service provider community, as well as to collect industry input; and
- Facilitated an industry discussion on 11/7 in Tampa, FL to discuss transition related items including vendor and service provider testing, group and round robin testing, connectivity, and the new MUMP process