

March 16, 2015

The Honorable Tom Wheeler, Chairman  
Federal Communications Commission  
445 12th Street, S. W.  
Washington, D.C. 20554

Dear Chairman Wheeler,

As former state commissioners who worked cooperatively with the Federal Communications Commission (FCC), we take pride in the role states played in pro-competitive, pro-consumer telecommunications policy implementations, such as Local Number Portability (LNP). The FCC, via a March 4 “Fact Sheet”, announced that it is poised to approve a transition between LNP administrators that will greatly affect consumers and competition in every state. A state role in this transition was not apparent in that Fact Sheet. Because of the effects this transition will have at the state level, it is critical that the FCC and the states work cooperatively together and that the states be provided an opportunity to review the plan by which the LNP services will be transferred from one vendor to another and to provide feedback.

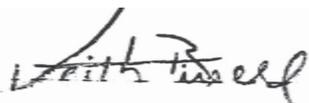
The states led the way in allowing consumers to take their telephone number with them as they moved between wireline carriers. They provided the test beds for the first number portability trials, as well as trials for critical LNP-based telephone number conservation measures like number pooling. The states pushed hard for the expansion of number portability into wireless and for a uniform porting process. The states recognized that in order to have a level playing field, whatever entity administered numbering services, including LNP, would need to be impartial and neutral. That fundamental belief was the bedrock for what has now evolved into the authoritative service upon which thousands of carriers and millions of customers around the country rely.

Pending with the FCC is a decision as to what company should administer LNP moving into the future. **We take no position on the selection of one company over another however, should an informed change ultimately be elected by the Commission, we do strongly encourage the FCC to ensure the selection is well considered and any transition is accomplished in a measured manner.** To do so, we urge the Commission to complete a robust and independent analysis of the costs and risks of transition. We advise the FCC to be cautious and take all appropriate steps to ensure that the next LNP Administrator is not only impartial, but also continues to offer all those services today used by consumers, competitors, law enforcement, and 911 providers. We further advise the FCC to ensure all the appropriate steps are taken to put proper cyber security and disaster recovery measures in place.

Should the FCC, based on its own analysis of technical expertise, and the total costs of a transition decide that a transition between vendors is necessary, that transition must be done in a way that does not raise costs or risks for consumers, public safety and small carriers. There should be, at a minimum, a publicly vetted, detailed transition plan that includes end-to-end testing of the new systems in a production environment ensuring a continuation of error-free communications during and after such a transition. With over 700 million telephone numbers and 2,000 carriers dependent on the LNP system, the states will likely face the brunt of any consumer and carrier complaints over a failure in transition.

We therefore urge the Commission to allow the states insight into any transition process and to give careful consideration to the consequences of such a momentous decision for the American people.

Sincerely,



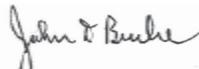
**Keith Bissell – Tennessee**



**Anne C. Boyle – Nebraska**



**Linda Breathitt – Kentucky**



**John D. Burke - Vermont**



**Lisa Crutchfield – Pennsylvania**



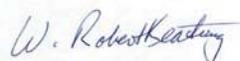
**Thomas J. Dunleavy - New York**



**Patricia Eckert – California**



**David Johnson – Ohio**

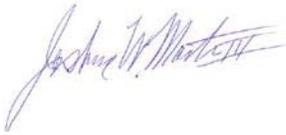


**W. Robert Keating – Massachusetts**



**Larry S. Landis – Indiana**

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**Joshua W. Martin III – Delaware**



**Jon McKinney - West Virginia**



**Robert B. Nelson – Michigan**



**Dr. Eddie Roberson, Ph. D – Tennessee**



**Dr. Edward H. Salmon - New Jersey**



**Dr. Alecia M. Wells – USVI**



**David A. Wright - South Carolina**

Cc: The Hon. Mignon Clyburn, Commissioner  
The Hon. Jessica Rosenworcel, Commissioner  
The Hon. Ajit Pai, Commissioner  
The Hon. Michael O’Rielly, Commissioner