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April 20, 2015

**Via E-Mail**

Mr. Timothy Decker  
Co-Chair  
North American Portability Management, LLC  
E-mail: Timothy.Decker@Verizon.com

Mr. Tim Kagele  
Co-Chair  
North American Portability Management, LLC  
E-mail: tim.kagele@cable.comcast.com

Dear Messrs. Decker and Kagele:

I am writing on behalf of the LNP Alliance,<sup>1</sup> a consortium of small and medium-sized providers focused on ensuring that the LNPA selection process and transition take into account the concerns of its small and medium-sized provider members and other similarly situated providers. The LNP Alliance is writing to provide input into the Transition Oversight Plan to be filed within 30 days of the Commission's March 27 Order<sup>2</sup> regarding the Local Number Portability Administrator ("LNPA") selection process ("*LNPA Order*").

The LNP Alliance requests that it be kept closely apprised of developments regarding the Transition Oversight Plan. The Commission in the *LNPA Order* emphasized that smaller providers must be included in the transition process at every stage: "The Transition Oversight Plan should include oversight, timelines, performance benchmarks and incentives, dispute resolution, testing, *stakeholder outreach and education (with emphasis on smaller providers)*,

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<sup>1</sup> The LNP Alliance currently consists of Comspan Communications, Inc., Telnet Worldwide, Inc., the Northwest Telecommunications Association ("NwTA"), and the Michigan Internet and Telecommunications Alliance ("MITA"). The LNP Alliance is focused on ensuring that the LNPA selection process takes into account the concerns of its S/M provider members and other similarly situated providers.

<sup>2</sup> *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration*, Order, WC Docket No. 07-149 (rel. March 27, 2015).

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and steps to ensure security and reliability.”<sup>3</sup> As the Commission specifically stated: “we direct the NAPM to reach out and involve small providers in planning LNPA transition requirements, schedules, and testing appropriate to their needs.”<sup>4</sup> With respect to testing, the Commission said that “[t]esting should also involve the industry users of the database, in particular smaller providers.”<sup>5</sup>

Accordingly, the LNP Alliance believes that it is critical that we and other small and medium-sized carriers be given the opportunity to be involved in the transition from the outset. We request that the LNP Alliance be included in any e-mail distribution list developed by NAPM to implement the requirements of the *LNPA Order*<sup>6</sup> in such a manner that we have an opportunity to provide input into the Transition Oversight Plan and the monthly status reports to the Bureau. We are particularly interested in providing input at this formative stage, including input into the “experienced third parties” that will provide oversight of the transition process<sup>7</sup> and ensuring that smaller providers are represented among those third parties. If there is to be a single third party manager, the LNP Alliance would like to have input as to who will take on that role to ensure that they are neutral and not inclined towards supporting only large company interests.

Regardless of which entity provides the LNPA functions prospectively, the LNP Alliance is focused on ensuring that: the initial and recurring costs to smaller providers are not disproportionate or excessive; the transition occurs seamlessly with rigorous testing and thorough reliability; the LNPA is a neutral administrator; and the LNPA transition is conducted in such a manner that it accelerates and in no way impedes the IP Transition.

In order to begin the process on the right foot, the LNP Alliance requests an advance copy of the Transition Oversight Plan with sufficient advance timing to provide feedback and input, at least to the same extent that NAPM member companies have similar access. We also request a conference call this week at your earliest convenience to discuss the current status and content of the Transition Oversight Plan. Finally, we would expect that the Transition Oversight Plan will be a nonconfidential and publicly filed document and that, once filed, there will be sufficient time for broader public comment.

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<sup>3</sup> *LNPA Order*, ¶ 159 (emphasis added).

<sup>4</sup> *Id.*, ¶ 154.

<sup>5</sup> *Id.*, fn. 558.

<sup>6</sup> For the time being, please include Jerry James, Dave Malfara, and myself on such distribution lists.

<sup>7</sup> The *LNPA Order* requires oversight “by experienced third parties familiar with communications infrastructure, project management, and change management.” *Id.*, ¶ 158.



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We understand that there is a tight deadline to prepare the Transition Oversight Plan but we look forward to working with you to provide input at this time. Thank you for your attention to this matter, and I look forward to hearing back from you shortly.

Sincerely,

/s/ James C. Falvey  
James C. Falvey  
*Counsel for The LNP Alliance*

cc: Julie Veach  
Lisa Gelb  
Daniel Alvarez  
Jerry James  
David J. Malfara, Sr.