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April 21, 2015

**Ex Parte**

Julie A. Veach  
Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: Notice of Ex Parte Communication, *Telephone Number Portability et al.*,  
CC Docket No. 95-116; WC Docket No. 09-109**

Dear Ms. Veach:

I am writing on behalf of the LNP Alliance<sup>1</sup> to request that the LNP Alliance be integrally involved in the development of the Transition Oversight Plan to be filed by the North American Portability Management LLC (“NAPM”) 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 appreciates the Commission’s emphasis in the *LNPA Order* on including smaller providers 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), and steps to ensure security and reliability.”<sup>3</sup> As you know, the Commission also directed “the NAPM to reach out and involve small providers in planning LNPA transition requirements,

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<sup>1</sup> The LNP Alliance is 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 currently consists of Comspan Communications, Inc., Telnet Worldwide, Inc., the Northwest Telecommunications Association (“NwTA”), and the Michigan Internet and Telecommunications Alliance (“MITA”).

<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).

<sup>3</sup> *LNPA Order*, ¶ 159.

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schedules, and testing appropriate to their needs.”<sup>4</sup> With respect to testing, the Commission stated “[t]esting should also involve the industry users of the database, in particular smaller providers.”<sup>5</sup>

As detailed in the attached letter, the LNP Alliance has recently requested of the NAPM that we be involved in the transition from the outset, including providing input into the Transition Oversight Plan. In order to ensure that we are included in the process in a meaningful way, we have requested of the NAPM Co-Chairs that:

- The LNP Alliance be included in any e-mail distribution list developed by NAPM to implement the requirements of the *LNPA Order* 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.
- The LNP Alliance have input into the selection of the “experienced third parties” and/or third party manager that will provide oversight of the transition process<sup>6</sup> in order to ensure that smaller providers are represented in the oversight process.
- The LNP Alliance be provided an advance copy of the Transition Oversight Plan with sufficient advance timing to provide feedback and input, at least to the extent that NAPM members receive similar information.
- We convene a conference call this week with the NAPM Co-Chairs to discuss the current status and content of the Transition Oversight Plan.

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; that the transition occur seamlessly with rigorous testing and thorough reliability; that the LNPA be a neutral administrator; and that the LNPA transition be conducted in such a manner that it accelerates and in no way impedes the IP Transition.

We look forward to working closely with the Bureau and the NAPM throughout this process. We also welcome any input from the Bureau as to how it envisions that the LNP Alliance and other small providers will be included in the implementation of the Transition Oversight Plan prospectively. Finally, we hope that the Bureau would agree that the Transition

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<sup>4</sup> *Id.*, ¶ 154.

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

<sup>6</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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Oversight Plan will be to the greatest extent possible nonconfidential and that, once filed, there will be ample time for broader public comment.

Thank you for your attention to this matter. As required by Section 1.1206(b), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceedings. If you have any questions or require additional information, please do not hesitate to contact me at 202.659.6655.

Sincerely,

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

Enclosure

cc: Timothy Decker, NAPM Co-Chair  
Tim Kagele, NAPM Co-Chair  
Daniel Alvarez  
Lisa Gelb  
Michele Ellison  
Sanford Williams  
Jerry James  
David J. Malfara, Sr.