

**Before the  
FEDERAL COMMUNICATIONS  
COMMISSION  
Washington, D.C. 20554**

In the Matter of North American  
Portability Management, LLC's  
Transition Oversight Plan for  
Local Number Portability  
Administrator Contract

WC Docket No. 07-149  
WC Docket No. 09-109  
CC Docket No. 95-116  
DA 15-554

**JOINT STATE COMMISSIONS COMMENTS**

The state public service commissions from the states of Idaho, Maine, and Nebraska listed in Attachment A to these comments (Joint State Commissions), respectfully submit these comments in response to the Wireline Competition Bureau's Notice seeking comments on the North American Portability Management LLC's (NAPM LLC) Transition Oversight Plan (transition plan).

The Joint State Commissions support the NAPM LLC's intent to "engage the NANC as a mechanism through which industry stakeholders, including small providers and state regulators, can participate and ensure that their concerns have been adequately addressed".<sup>1</sup> In order to ensure input from the States in this process, the Joint State Commissions suggest that the Local Number Portability Administration Working Group (LNPA-WG), which is under the direction of the NANC, serve as the forum for the industry stakeholders, including small providers and state regulators, to raise technical concerns of the transition. The LNPA-WG has a long standing history of providing NANC guidance regarding impacts of changes to Local Number Portability that are operational and technical in nature.

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<sup>1</sup> Letter from Todd D. Duabert, Counsel to NAPM LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 and 09-109, CC Docket No, 95-116, (filed Apr. 27, 2015), at p. 5.

The Joint State Commissions appreciate that the FCC has recognized the need for transparency, as well as, the need to allow industry stakeholders, including small providers and state regulators, the opportunity to participate and ensure that their concerns have been adequately addressed.

Respectfully submitted,

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May 21, 2015

**Attachment A**

**List of parties joining comments in  
WC Docket No. 07-149  
WC Docket No. 09-109  
CC Docket No. 95-116**

/s/ Paul Kjellander

Paul Kjellander,  
President  
Idaho Public Utilities Commission

/s/ Mark Vannoy

Mark Vannoy,  
Chair  
Maine Public Utilities Commission

/s/ Gerald L. Vap

Gerald L. Vap,  
Chairman  
Nebraska Public Service Commission