

Before the
Federal Communications Commission
Washington, D.C. 20554

<i>In the Matter of</i>)	
)	
Petition of Telcordia Technologies, Inc. to Reform Amendment 57 and to Order a Competitive Bidding Process For Number Portability Administration)	WC Docket No. 07-149
)	
Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute a Competitive Bidding for Number Portability Administration, and to End the NAPM LLC's Interim Role in Number Portability Administration Contract Management)	WC Docket No. 09-109
)	
Telephone Number Portability)	CC Docket No. 95-116

COMMENTS OF JOHN STAURULAKIS, INC.

JSI welcomes the opportunity to submit comments in response to the Federal Communications Commission's ("FCC" or "Commission") May 7, 2015 Public Notice seeking comment on the North American Portability Management LLC's Transition Oversight Plan for the next local number portability administrator ("LNPA").¹ JSI is a telecommunications consulting firm offering a full spectrum of regulatory, financial and operational services for clients primarily in the rural independent telecommunications industry. Among its operational consulting services, JSI provides Service Order Administration ("SOA") Management services to more than 290

¹ See Wireline Bureau Seeks Comment on the North American Portability Management LLC's Transition Oversight Plan for Local Number Portability Administrator Contract, WC Docket Nos. 07-149 and 09-109, CC Docket No. 95-116, Public Notice rel. May 7, 2015 ("LNPA Public Notice").

telecom providers. Through the SOA service, JSI obtains access to Neustar's Number Portability Administration Center ("NPAC") database for the purpose of identifying ported telephone number information on behalf of its local exchange carrier clients. As such, JSI is in a unique position to provide input on this matter.

As part of the LNPA vendor transition from Neustar, Inc. ("Neustar") to Telcordia Technologies d/b/a iconectiv ("Telcordia"), JSI would like to ensure that certain aspects of this transition have been addressed from a rural telecom perspective. Our three areas of concern are: project management, connectivity and accessibility, and cost.

I. Project Management Concerns

In regard to the project management process of this transition, JSI would like to again note that we act as a Service Bureau/porting agent to numerous rural telecom companies. Therefore, any criteria for registering and establishing services for individual service providers with Telcordia's NPAC, should be managed in such a way to allow Service Bureaus, operating on behalf of these service providers, to work directly with Telcordia to complete the transition. As Service Bureaus may have a significant number of clients to manage, any transition process would need to be efficiently handled by Telcordia to eliminate delays in the processing. JSI believes that Telcordia should assign a Transition Project Manager to each Service Bureau that represents numerous clients which will handle all the Service Bureau's issues and questions. Each Service Bureau should only have one point of contact at Telcordia to ensure proper communication and assistance with completing the necessary transition tasks.

II. Connectivity and Accessibility Concerns

In the matter of connectivity and accessibility concerns, JSI notes that as a user of Neustar's Low Tech Interface ("LTI") NPAC access, Service Bureaus have the ability to contract

for multiple port connections to the NPAC. This arrangement allows Service Bureaus to complete porting activity 24 hours a day, 7 days a week from any location Internet access can be obtained. It is essential that the ability to port remotely not be lost or diminished, and that the LTI arrangement is continued for small providers and Service Bureaus. JSI also believes that there should be no loss of current LTI features when transferring to Telcordia's NPAC access. More importantly, JSI believes that Telcordia should review all possible LTI enhancements and features to ensure the needs of Service Bureaus are met with this transition. Lastly, access to the NPAC should support use of any web browser and not be encumbered by software-related issues.

III. Cost Concerns

Cost has been the most significant factor in play today with JSI's clients. As small rural independent telephone companies and small CLECs, the majority of JSI's clients do not experience large volumes of ports on an annual basis. As such, company budgets may be tightly restricted based on work requirements. Therefore, JSI recommends that any costs associated with this transfer, including but not limited to registration fees, be nominal if not waived for existing NPAC registrants. It is JSI's opinion that the transfer to a new vendor should not result in any further start-up or registration payments on top of the costs service providers will incur for training and other internal costs. Furthermore, as Telcordia's bid for the NPAC contract equates to annual costs significantly below Neustar's, it would be expected that a portion of this cost reduction be reflected in the fees Telcordia will charge service providers/Service Bureaus to access the NPAC. Such charges would be inclusive of, but not necessarily limited to, port fee connections, transaction fees, and help desk charges.

JSI believes that transitioning to a new NPAC vendor will be a significant task. However, this task should be as seamless as possible to JSI's SOA clients. Given the FCC's requirement of

“emphasis on small providers”², JSI urges the North American Portability Management LLC, (“NAPM, LLC”) the North American Numbering Council (“NANC”) and the Transition Oversight Manager to reach out and involve rural service providers and their industry representatives in planning transition requirements, schedules and testing appropriate to their needs in order to ensure that the transition is as smooth and efficient as possible for those carriers. In particular, the transition should not provide any extra burden to the rural independent companies and small CLECs who are least able to bear the cost. Ensuring that the interest of these rural companies or small CLECs are considered, JSI feels that Telcordia, as the new NPAC vendor, must give specific consideration to these small companies and the Service Bureaus and consultants who represent them. Finally, JSI emphasizes that all requirements placed on service providers with this transition should be minimal in impact and complexity.

Respectfully submitted,

/s/ Valerie Wimer

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Filed May 21, 2015

² See Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration, WC Docket No. 07-149, Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration, and to End the NAPM LLC’s Interim Role in Number Portability Administration Contract Management, WC Docket No. 09-109, Telephone Number Portability, CC Docket No. 95-116, Order (rel. March 27, 2015) ¶ 159.