

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Wireline Competition Bureau Seeks Comment on the)	WC Docket No. 07-149
North American Portability Management LLC's)	WC Docket No. 09-109
Transition Oversight Plan for Local Number)	CC Docket No. 95-116
Portability Administrator Contract)	

To: The Commission

REPLY COMMENTS OF SYNIVERSE TECHNOLOGIES

Syniverse Technologies (“Syniverse”) provides this reply in response to the Commission’s request for comment on the Transition Oversight Plan submitted by the North American Portability Management LLC.¹

As discussed in more detail below, Syniverse agrees with commenters who observe that the Transition Plan needs to include greater guarantees and safeguards (including Commission oversight) to protect the Commission’s mandate that “no changes may be made to any existing interface functionality that will require modifications to users’ Service Order Administration (SOA) or Local Service Management System (LSMS) platforms”² in order to protect small carriers, intermediaries, and service bureaus from unnecessary burdens and costs. Syniverse also

¹ *Wireline Competition 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, 09-109, 95-116, Public Notice, CA 15-554 (rel. May 7, 2015) (“Public Notice”). *The North American Portability Management LLC Transition Oversight Plan*, attachment to Letter from Todd D. Daubert, Counsel to NAPM LLC, WC Docket Nos. 07-149, 09-109, 95-116 (filed April 27, 2015) (“Transition Plan”).

² *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration, et al.*, WC Docket Nos. 07-149 *et al.*, Order, 30 FCC Rcd 3082, 3144, 3147-48 ¶¶ 150, 154 (2015) (“LNPA Selection Order”).

agrees with commenters pointing out that the Transition Plan needs to address cost minimization, allocation, and recovery in a more detailed way.

I. THE TRANSITION PLAN MUST ENSURE THAT TRANSITION COSTS ARE MINIMIZED FOR ALL STAKEHOLDERS

While some carriers – particularly large carriers with significant resources – manage the complex processes involved in number portability themselves, many other carriers – particularly smaller carriers – rely on intermediaries and service bureaus, such as Syniverse, to provide these functionalities.³ Syniverse provides its service provider customers with access to all of the functionalities needed to manage the LNP process, including service order administration (“SOA”), intercarrier communication, troubleshooting, and queries for correct call routing. To meet the needs of its customers, Syniverse and similar companies have developed highly reliable systems for interfacing with the LNPA.

In order to provide this high degree of reliability for these crucial services, Syniverse has invested heavily in sophisticated systems, and tested them extensively to ensure that they interface seamlessly with the LNPA. Any changes to the LNPA’s functionality or interfaces, therefore, will require Syniverse and similar intermediaries and service bureaus to modify their own systems, and engage in extensive testing to ensure that the same high level of functionality is maintained.

In reaching its conclusion that the costs of the LNPA transition – including direct costs such as updates to interfaces and testing – would be minimal, the Commission relied heavily on the requirement in the LNPA request for proposals (“RFP”), reiterated in the *LNPA Selection Order*, that “no changes may be made to any existing interface functionality that will require

³ See, e.g., John Staurulakis, Inc. (“JSI”) comments at 1-2. Unless otherwise noted, references herein to parties’ “comments” refer to initial comments in this proceeding filed on or about May 21, 2015.

modifications to users' [SOAs] or [LSMS] platforms.”⁴ Given the importance of this aspect of the transition, Syniverse concurs with commenters that it should be addressed directly in the Transition Plan.⁵

The Transition Plan's treatment of this issue should cover at least three elements, as discussed in the comments. First, the transition plan should specifically provide that the new LNPA systems and interfaces remain entirely compatible with existing systems and interfaces, and provide for periodic checks to ensure this standard is met.⁶ The new LNPA should bear the burden of testing the new system to ensure its backwards-compatibility with existing carrier and intermediary interfaces. Second, the Transition Plan should include a clear mechanism for intermediaries and service bureaus to participate in the testing planning process to provide an independent check on this aspect of the transition.⁷ Third, the Transition Plan should provide clear and expeditious recourse to the Commission in the event these concerns are not being addressed in the transition process.⁸ The Transition Plan should call on the Transition Manager to ensure that the new LNPA's interfaces are identical and the new LNPA's testing regimen is sufficiently robust that, during the testing period, carriers and intermediaries/service bureaus that interface with the LNPA only need to do ordinary regression testing (comparable to the testing of

⁴ *LNPA Selection Order*, 30 FCC Rcd at 3144.

⁵ NTCA comments at 2; JSI comments at 2-3;

⁶ *See, e.g.*, NTCA comments at 3-4; JSI comments at 2-3

⁷ *See, e.g.*, LNP Alliance comments at 9; NTCA comments at 2; CCA comments at 2; JSI comments at 2.

⁸ *See, e.g.*, LNP Alliance comments at 9.

a new software version release).⁹ If the new LNPA and the manager do not meet these requirements, the Transition Plan should provide a clear path for stakeholders to seek expeditious relief from the Commission.

In sum, the Transition Plan should charge the new LNPA and the Transition Manager with ensuring that parties interacting regularly with the NPAC do not have to implement and test costly changes to their own systems and interfaces, and provide for clear recourse to the Commission if these targets are not being met.

II. THE TRANSITION PLAN MUST ADDRESS COST CONCERNS

Commenters across the board expressed a concern that the Transition Plan must address the costs of the transition and how those costs will be recovered. NTCA points out that “discussion of how any transition costs will be apportioned among various providers” is “noticeably absent” from the Transition Plan.¹⁰ Similarly, the LNP Alliance argues that the Commission “should take public comment on cost control and recovery for the costs of the Transition and the implementation of cost control and recovery mechanisms should be incorporated into the Transition Plan.”¹¹

Syniverse concurs that these issues need to be fleshed out and addressed in the Transition Plan, including mechanisms for avoiding the imposition of direct transition-related costs on carriers, either directly or via the intermediaries/service bureaus through which they interact with the LNPA. As noted above, the new LNPA should be responsible for testing to ensure that the

⁹ See NPAC SMS/Individual Service Provider Certification and Regression Test Plan for New Entrants Certification and Existing Service Providers/Vendors Regression Testing Up to and Including NPAC Release 3.4.6 (pub. Nov. 30, 2013).

¹⁰ NTCA comments at 3.

¹¹ LNP Alliance comments at 10.

new LNPA interfaces are entirely compatible with existing interfaces used by carriers and their intermediaries/service bureaus.¹²

As the Open Technology Institute at New America points out, the costs of the transition – including direct costs on carriers and third parties – “will ultimately be paid for by consumers and taxpayers.”¹³ Thus it is squarely in the Commission’s mandate to ensure that these costs are minimized and managed effectively. Thus, cost and cost recovery issues must be addressed in the Transition Plan.

III. CONCLUSION

Syniverse urges the Commission to direct the new LNPA to revise the Transition Plan as discussed herein, and to retain an active oversight role in the transition to ensure that costs are minimized and appropriately distributed.

Respectfully submitted,

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¹² See *supra* Section I.

¹³ Open Technology Institute comments at 3.