

July 31, 2015

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Telephone Number Portability, et al.
CC Docket No. 95-116; WC Docket Nos. 09-109 and 07-149**

Dear Secretary Dortch:

The North American Portability Management LLC (the "NAPM LLC"), by its attorneys, hereby files a written summary of the NAPM LLC's status updates to the Federal Communications Commission ("FCC" or "Commission") regarding the transition from the current local number portability administrator ("LNPA"), Neustar, to the new LNPA, Telcordia d/b/a iconectiv (the "Report"). This Report updates the FCC, the public, and all interested stakeholders regarding transition activities to date in accordance with the requirements of the LNPA Selection Order¹ and guidance received from the FCC on Wednesday, June 24, 2015. The NAPM LLC will file written updates of this Report with the FCC at the end of each month, beginning July 31, 2015.

Transition Oversight Plan

On April 27, 2015, the NAPM LLC filed its Transition Oversight Plan,² which outlined the steps to be undertaken to ensure a successful transition to the new LNPA, in accordance with the requirements of the LNPA Selection Order.³ As the NAPM LLC explained in its filing, the Transition Oversight Plan is a living document that will be updated as appropriate throughout the transition period. On May 7, 2015, the FCC requested public comment on the Transition Oversight Plan.⁴ Interested parties filed responsive comments and reply comments on May 21, 2015, and June 1, 2015, respectively.⁵ The next version of the Transition Oversight Plan that the NAPM

¹ *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116, ¶¶ 158-59 (rel. Mar. 27, 2015) (*LNPA Selection Order*).

² Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 and 09-109, CC Docket No. 95-116, Attach. (filed Apr. 27, 2015).

³ *LNPA Selection Order*, ¶¶ 158-59.

⁴ *Wireline Competition Bureau Seeks Comment on the North American Portability Management LLC's Transition Oversight Plan for Local Number Portability Administration Contract*, Public Notice, WC Docket Nos. 07-149 and 09-109, CC Docket No. 95-116 (rel. May 7, 2015).

⁵ Comments of the Nebraska Public Service Commission; NTCA - The Rural Broadband Association; John Staurulakis, Inc.; the LNP Alliance; Competitive Carriers Association; and Open Technology Institute at New America. Reply Comments of COMPTTEL; NARUC; Telcordia Technologies, Inc., d/b/a iconectiv; Syniverse Technologies; Competitive Carriers Association, Open Technology Institute at New America, and Public Knowledge; ITTA; Neustar, Inc.; and the LNP Alliance.

LLC will file with the FCC will reflect, as appropriate, input received from interested parties and additional information developed since April 27, 2015. Among other additions, the updated Transition Oversight Plan will include a more robust discussion of the NAPM LLC's plans to ensure broad stakeholder outreach and education.

Stakeholder Outreach and Education

The updated Transition Oversight Plan will include, as an attachment, a Transition Outreach and Education Plan ("TOEP"), which the NAPM LLC is finalizing with the oversight of the FCC. The TOEP creates an inclusive means for stakeholders interested in the LNPA process to provide meaningful input, including the use of multiple channels and methods to convey targeted and timely communications to all stakeholder groups, including, but not limited to, small carriers, state regulatory authorities, and law enforcement and public safety entities. One goal of the TOEP is to ensure that the NAPM LLC receives timely feedback from a representative sampling of the relevant stakeholders. The TOEP will be finalized soon, at which time the NAPM LLC will file the TOEP with the updated Transition Oversight Plan with the FCC.

Steps to Ensure Security and Reliability (Including Public Safety and National Security)

The NAPM LLC has been working closely with the FCC, which has been coordinating input from Federal stakeholders, and stands ready to continue to meet with law enforcement and national security officials with the goal of ensuring that the new LNPA contract thoroughly addresses all security and reliability concerns and meets vital stakeholder needs. Among other issues, the NAPM LLC is taking the steps necessary to ensure that the new LNPA Contract:

- (1) facilitates FCC oversight, use by law enforcement in a manner that protects public safety and national security, and eventual transition to a new LNPA;
- (2) sets forth specific deadlines for implementation;
- (3) establishes benchmarks and incentives for performance both during and after the transition;
- (4) contains effective dispute resolution mechanisms; and
- (5) ensures that testing will be performed in a manner which protects users from failures.

The new LNPA contract will reflect not only the wisdom gained over the years since the implementation of local number portability, but also the input from the FCC, the Federal Partners, participants in the rulemaking proceeding, and those who have provided feedback on relevant issues to the NAPM LLC.

Transition Oversight Manager

The NAPM LLC has selected Pricewaterhousecoopers LLC ("PwC") as the Transition Oversight Manager ("TOM") that the FCC directed the NAPM LLC to engage in the LNPA Selection Order.⁶ The NAPM LLC selected PwC as the winning bidder in the Request for Proposal process that the NAPM LLC conducted to choose the most cost-effective and qualified vendor to provide TOM services. Of the 15 parties who requested information regarding the TOM RFP, six submitted bids. The NAPM LLC and PwC reached agreement regarding the Letter of Engagement for TOM Services subject to oversight by the FCC. The Letter of Engagement should be fully executed next week. PwC will begin providing service as the TOM shortly thereafter.

Negotiations With iconectiv

The NAPM LLC and iconectiv began negotiating the new LNPA contract on May 21, 2015. The parties continue to meet regularly, and conduct conference calls between meetings, in order to negotiate the terms and conditions of the new LNPA contract. The parties chose to focus on the most complex terms and conditions first

⁶ *LNPA Selection Order* ¶ 158 ("We therefore direct the NAPM to take all necessary steps to ensure that the transition is overseen by experienced third parties familiar with communications infrastructure, project management, and change management.").

before moving on to more standard contractual issues. The negotiations are going well, and we expect to have reached agreement in principle regarding the most complex terms by the end of next week. We expect that the pace of negotiations for the remaining terms should be much faster. At this time, we are still on schedule to provide the FCC with a final agreement by the end of August. However, if necessary to secure the maximum benefit on behalf of the public and the wide range of stakeholders, the negotiations could extend into September. The NAPM LLC does not anticipate that any such short extension of negotiations would have a material impact on the completion date for the implementation schedule

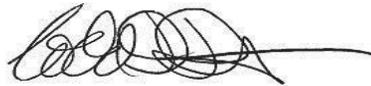
Negotiations With Neustar

As explained in the Notice of Ex Parte that the NAPM LLC filed with the FCC on June 23, 2015, the NAPM LLC negotiated a statement of work ("SOW") for the cost recovery of the TOM⁷ in accordance with the FCC's written confirmation filed as DA 15-799.⁸ Moreover, the NAPM LLC intends to begin negotiation for a transition services agreement with Neustar. The transition services would constitute any additional services above and beyond the standard LNPA services provided by Neustar today that are necessary to facilitate a successful transition to the new LNPA.

* * *

Please contact the undersigned if you have any questions or would like any additional information about the issues discussed herein.

Respectfully submitted,



Todd D. Daubert
Counsel to the NAPM LLC

⁷ Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 09-109, CC Docket No. 95-116 (filed June 23, 2015).

⁸ Letter from Matthew S. DeInero, Chief, Wireline Competition Bureau, Federal Communications Commission, to Todd D. Daubert, Counsel to the NAPM LLC, DA 15-799, WC Docket No. 09-109, CC Docket No. 95-115 (filed July 9, 2015).