

August 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 Order<sup>1</sup> 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,<sup>2</sup> 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.<sup>3</sup> 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. Concurrently with this Report, the NAPM LLC is filing the next version of the Transition Oversight Plan, which reflects, as appropriate, input received from interested parties and additional information developed since April 27, 2015. Among other additions, the updated Transition Oversight Plan includes a more robust discussion of the NAPM LLC's plans to ensure broad stakeholder outreach and education. The NAPM LLC will also publish the updated Transition Oversight Plan on the public portion of the NAPM LLC's website at [www.NAPMLLC.org](http://www.NAPMLLC.org).

### **Stakeholder Outreach and Education**

The updated Transition Oversight Plan includes, as an attachment, a Transition Outreach and Education Plan ("TOEP"), which the NAPM LLC recently finalized 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

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<sup>1</sup> *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*).

<sup>2</sup> 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).

<sup>3</sup> *LNPA Selection Order*, ¶¶ 158-59.

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 good sampling of the relevant stakeholders. The NAPM LLC is working with the TOM to implement the TOEP.

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

The NAPM LLC has been working closely with the FCC and the Federal stakeholders 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 stakeholders, participants in the rulemaking proceeding, and those who have provided feedback on relevant issues to the NAPM LLC.

### **Transition Oversight Manager**

As reported in the Transition Status Report filed on July 31, 2015, the NAPM LLC selected PricewaterhouseCoopers ("PwC") as the TOM that the FCC directed the NAPM LLC to engage in the LNPA Selection Order.<sup>4</sup> In this regard, the NAPM LLC and PwC executed a Letter of Engagement for TOM Services on August 7, 2015. PwC has initiated meetings with the NAPM LLC Transition Subcommittee, iconectiv and Neustar to begin coordination of information and communications between the parties and an updated TOP that can be shared with all interested stakeholders.

### **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 negotiations continue to proceed as expected, and we are working closely with the FCC and Federal stakeholders to ensure that the LNPA contract meets the needs of all stakeholders. In order to secure the maximum benefit on behalf of the public and the wide range of stakeholders, the LNPA will likely deliver the new LNPA contract to the FCC during 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 TOM<sup>5</sup> in accordance with the FCC's

<sup>4</sup> *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.").

<sup>5</sup> 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).

written confirmation filed as DA 15-799.<sup>6</sup> 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.

In addition, the NAPM LLC and Neustar previously reached agreement on SOW 98 for implementation of the billing for the TOM as a new line item in the monthly NPAC bills that all service providers receive. To this end, Neustar will include the following bill notice in prospective service provider NPAC billing:

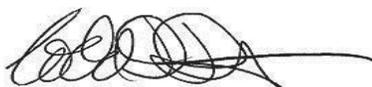
The North American Portability Management LLC (NAPM LLC) has engaged the services of a third party Transition Oversight Manager (TOM) in accordance with the FCC's March 27, 2015 order (<http://apps.fcc.gov/ecfs/comment/view?id=60001027712>). On July 9, 2015, the FCC concluded and confirmed (<http://apps.fcc.gov/ecfs/comment/view?id=60001092452>) that charges incurred in connection with the TOM are "shared costs" to be "borne by the industry as a whole", and that fees should be allocated "in the same manner as all other shared costs [for Number Portability] are assessed today."

On July 13, 2015, the NAPM LLC entered into Statement of Work No. 98 for Neustar to provide the billing, collection and remittance of charges related to the TOM. Pursuant to that SOW: (a) the Revenue Recovery Charge (RRC) rate has been increased from 0.50% to 0.75% effective August 1, 2015 and (b) allocable charges for the TOM will be set forth beginning in your invoice delivered October 2015.

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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*

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<sup>6</sup> Letter from Matthew S. DeNero, 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).