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December 4, 2015

Via E-Mail and U.S. Mail

Matthew S. DelNero
Bureau Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Telephone Number Portability, CC Docket 95-116; Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al., 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, WC Docket 09-109*

Dear Mr. DelNero:

The LNP Alliance (“LNP Alliance” or “Alliance”)¹ would like to urge the Bureau and the Commission to closely monitor the process and the actual transition to a potentially new Local Number Portability Administrator (“LNPA”) (the “LNPA Transition” or “Transition”) to ensure that there is not an undue impact on smaller carriers and their customers. We are particularly concerned about the timing and the cost of the LNPA Transition, and the manner in which the LNPA Transition is coordinated with the IP Transition.

To date, there has been conflicting information available as to the timing of the LNPA Transition. A number of different end dates for the Transition—ranging from March 2017 to November 2017 to still later—have been offered by NAPM and other interested parties, but there is currently no definitive timeline for the LNPA Transition. For example, Comcast stated at the December 1 North American Numbering Council (“NANC”) meeting that it is already working on systems changes in preparation for testing in 2016. Most small/medium carriers are in the final stages of completing their budgets for 2016 and have been provided no firm information to

¹The LNP Alliance is a consortium of small and medium (“S/M”) providers that currently consists of Comspan Communications, Inc., Telnet Worldwide, Inc., the Northwest Telecommunications Association (“NWTa”), and the Michigan Internet and Telecommunications Alliance (“MITA”). The LNP Alliance is focused on ensuring that the LNPA selection process takes into account the concerns of its S/M provider members and other similarly situated providers.

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budget for or begin implementing such changes. As we have indicated in past comments, we support a public timeline for the Transition that is transparent and updated periodically and publicly as circumstances change. We understand that there will be changes to the timeline but there must be a public timeline to which small and large carriers alike have equal access.

We are also concerned that the direct costs to small carriers have not been clarified publicly. We attended the NANC Meeting on December 1, 2015 and the North American Portability Management LLC (“NAPM”) made it clear that it expects there will be costs to small carriers as early as 2016. In addition to direct costs, each carrier will also incur internal costs and resource allocation to prepare for system adjustments and testing throughout the Transition process. As small carriers sit down in final budget meetings for 2016, we do not have the information necessary to determine our costs in 2016 and beyond, including the timing and costs associated with the thorough testing that responsible carriers must engage in to have a successful Transition. We continue to track this process closely and we look forward to the first webinar sponsored by the Transition Oversight Manager (“TOM”) on December 9, 2015. We are hopeful that this meeting and similar follow-on meetings organized by the TOM will clearly address these cost issues, as well as the timing issues we raise above. We also recommend that the LNPA Working Group, which is open to all carriers at no cost, play a central role in the information exchange in this critical process. In the meantime, we want to keep you apprised of these concerns so that the Commission can ensure that these concerns are thoroughly covered in upcoming TOM webinars and, hopefully, face-to-face meetings.

The third issue of concern to the LNP Alliance is the interrelationship between the LNPA Transition and the IP Transition. Although we are billing our customers for the costs of the TOM, we have not been provided a copy of the Letter of Engagement signed with the TOM. Likewise, we have not received a copy of the NAPM Master Service Agreement (“MSA”) with iconectiv. Without these documents or any other information, we cannot determine whether and how the LNPA Transition will be coordinated with the IP Transition. We believe the IP-to-IP routing of all voice and data traffic must be included in this LNPA Transition project, since the industry’s transition to IP is already well underway. Further, the industry has been unable to reach consensus on a standardized method to be used for the exchange of IP routing information between carriers, and it is highly probable that Commission intervention will be necessary to resolve that issue. We are concerned, therefore, that there could be added costs and/or disruption of services if there is not close coordination between the LNPA and IP Transitions.

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Again, we look forward to learning more at next week's TOM webinar and request that you monitor these issues closely to ensure a successful LNPA Transition. As required by Section 1.1206(b), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please direct any questions regarding this matter to the undersigned.

Respectfully Submitted,

/s/ James C. Falvey

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