Questions Regarding the LNPA Transition Process

The LNP Alliance, FISPA, and the Open Technology Institute at New America are submitting the following questions through the NAPM website. We respectfully request answers directly in writing and by posting on the NAPM website.

1. The TOM TOEP FAQ ("FAQ") posted on the NAPM website stipulates that the only mechanism by which interested parties may submit input, feedback or direct questions relative to the LNPA transition to the TOM is through the "Comments" form on the NAPMLLC.org website. The FAQ also claims that the TOM's goal is to provide "transparent communications" regarding the LNPA Transition.
    a. Has the TOM recorded and archived all input submitted through the Comments section? If not, why not?
    b. Has the TOM recorded and archived all questions submitted through the two prior webcasts? If not, why not?
    c. Has the TOM recorded and archived all its communications, including reports to NAPM, the FCC, or the NANC? If not, why not?
    d. Will all questions submitted in the Comments and the webcasts by any party and the applicable responses be available to the public for review on the NAPM website? If not, why not?
    e. The TOM Engagement Letter Summary posted on the NAPM website February 16, 2016 states that the TOM's reporting to the NAPM will include "written outlines, executive summaries, presentations, memoranda, analysis of issues, and schedules prepared in connection with the engagement as requested by the NAPM and sufficient to document and to evidence the advice and Services . . . ." Will all such communications ("Industry Reports"), including reports to NAPM, the FCC, and the NANC be made available to the public for review on the NAPM website? If not, why not?

2. Although the TOM and the Commission claim that transparency is required, the current method of communication—where only the TOM sees all the questions and dictates which ones will be answered—is completely lacking in transparency absent additional disclosure on the part of the TOM.[1] Relative to this point:
    a. Is the TOM prepared to release all communications, including Industry Reports, and those questions and comments submitted through the previously described Comments form and prior and future webscasts to all interested parties? If so, when? If not, why not?
    b. Has the TOM organized all such communications into categories, quantifying the number of questions in each category for the purpose of prioritization and weighting? If so, what methods were used? If not, why not?
    c. Are there any categories that the TOM has chosen not to address? For example, LNP Alliance members have asked a number of questions on the two webinars about costs and yet the FAQs are completely silent on the issue of costs. The lack

[1] Imagine if the President were allowed to hand pick the questions to be answered at every press conference.

of disclosure described above makes it impossible for the vast majority of companies in the industry to have input into the LNPA Transition process. The fact that the TOM can only be accessed by non-NAPM carriers through the NAPM website and only through one-way webinars should be of obvious concern to the Commission. There must be communication between all industry members in order to have a meaningful collaborative process, as takes place in the LNPA Working Group, ATIS, or the NANC, for example. Why are interested parties who have signed the Protective Order not given this collaborative opportunity as a critical component of transparency obligations?

d. What are the long list of "action items" that have been opened and closed, or remain pending? There is no reason why non-NAPM carriers should not have access to this information.

3. The TOM's FAQ response to a question regarding coordination with the IP Transition states that the:

> IP transition is a separate initiative with multiple components that is being evaluated on its own timetable. It is expected that if there are NPAC updates required for IP transition, they will be incorporated when available.

This answer is unresponsive to the question. The IP transition is not a future development; it is happening now. Does the TOM, under the TOM Engagement Letter, have the responsibility to identify and contemplate potential inter-dependencies between the two transitions as part of its core responsibilities? Does the TOM have a process to stay informed about the IP Transition? If so, how is the TOM insinuating itself into the IP Transition implementation process (*e.g.*, through communications with the NANC and/or FCC Staff) in order to stay informed of potential interdependencies?

4. Obviously, any delay of the LNPA Transition is costly to the industry and to consumers. When does the TOM anticipate having a definitive schedule, presumably based on a fully executed iconectiv agreement? When does the TOM expect a fully executed iconectiv agreement to be executed and when will such agreement be made public?

5. When will we know the complete transition timeline and have a basis for estimating the costs of the LNPA Transition for carriers and any changes to carriers' costs resulting from the LNPA Transition?

6. The FCC directed the NAPM to hire a transition manager "familiar with communications infrastructure." What are the technical capabilities and subject matter expertise of the members of the TOM as it relates to this project, including prior experience implementing number portability systems in the U.S.?

7. The NAPM recently made a summary of the TOM Engagement Letter public. Will the TOM and the NAPM make the actual Engagement Letter and all associated documents public? The LNP Alliance has asked this of the Commission and directly of the NAPM. If not, why not, given that the industry and consumers are paying for the TOM's services?

8. As for the project planning by small/medium carriers, the fourth quarter is a difficult and very busy period due to increased consumer activity, budget planning activity, end-of-year sales/implementation activity, the holidays, and resource limitations. Will the TOM take such factors concerning fourth quarter demands into consideration when planning its testing periods?

9. Will the network interconnections with iconectiv be in the same location as Neustar or different? When will these locations be identified?

10. Testing should be mandatory because all carriers rely on other carriers to be in compliance with porting and routing of traffic, which by definition are bilateral activities. How can any provider or service bureau be permitted to go "live" without a firm requirement to pretest their network and systems to ensure no disruptions or delays in porting and routing?

11. How will non-carrier providers that obtain direct access to numbers under the FCC's new process for providing direct access to non-carriers be treated in the testing process? Will testing be mandatory for non-carriers to ensure proper porting and routing?

12. How will the TOM handle notification to each carrier to ensure compliance with any network changes or system modifications prior to testing? Will any issues be made public so other carriers may be alerted?

13. What industry conferences will TOM representatives attend to meet with carriers and answer questions? Will these questions and responses be posted on the NAPM website?

14. Will there be requirements to notify end user customers of the LNPA Transition? What are those requirements and when will they be implemented?