

The LNP Alliance maintains that the timeline for the LNPA Transition as published by the TOM is underdeveloped, incomplete and vague. Further, the timeline has limited use to the industry for the purposes of LNPA Transition budgetary and personnel planning because it has proven to be unreliable. For example, the recent sudden reductions in the timespan for both testing and data migration, where the TOM reduced both intervals in half, without explanation or support, makes it extremely difficult for a business to rely on the TOM timelines prospectively.

In light of these facts, the LNP Alliance urges the TOM to hold industry workshops wherein expert industry representatives from all stakeholders in the LNPA Transition can help create a comprehensive transition plan and timeline that addresses the myriad issues that may have escaped consideration by the TOM in the development of its current timeline. We understand the TOM has stated the process will be more defined once the iconectiv contract is approved. However, the steps for a project of this nature can certainly be defined in advance and in much greater detail than we have seen to date, whatever the start date of the LNPA Transition.

For example, the TOM has long stated that the IP Transition is not part of their charter and need not be incorporated into the LNPA Transition. Yet the IP Transition is happening right now and the NPAC database parameters must reflect that transition if the NPAC is not expected to become obsolete within a matter of a few years. To the extent the TOM does not anticipate the concurrent issuance of complex NANC Change Orders to accommodate the IP Transition in the development of its timeline, the timeline itself will not prove to be a meaningful guideline for the industry.

To date, the critical impact of the concurrent IP Transition on the LNPA Transition seems to have been lost on the TOM. The TOM, it seems, expects the industry's efforts at service improvement, cost reduction, and revenue enhancement to somehow freeze for a period of 24-30 months or more, while the TOM executes an isolated project plan for LNPA vendor substitution. While the IP Transition promises billions in savings across the industry, the LNPA Transition promises a mere fraction of that amount. If this current mindset prevails, the LNP Alliance is deeply concerned that alternative private databases will supplant and obsolete the industry's statutorily-mandated neutral and independent NPAC database.

Already, the absence of industry consensus regarding a preferred operational framework for routing information exchange has resulted in an explosion of variants, some of which may subsume the role of the NPAC database entirely. These methods are *in current use*. To the extent the TOM continues to ignore these developments, all its efforts will merely replace one circa-1990s system with another of equal vintage. In such a case, all of the work and resources of the TOM—as well as those engaged in good faith internal planning within their respective organizations—will be for naught.

In consideration of the issues described above, the LNP Alliance asks the following questions of the TOM:

1. When we review the TOM LNPA Transition timelines issued in January 2016 and then in April 2016, the intervals for testing and data migration each appear to have been cut in half.

What was the reason for cutting these critical intervals back and won't this increase the likelihood of disruption to smaller carriers and consumers during the LNPA Transition?

2. Will the TOM agree to conduct industry workshops wherein expert industry representatives from all stakeholders in the LNPA Transition can create a comprehensive transition plan and timeline that addresses the issues discussed above that could impact the LNPA Transition?

3. Has the TOM considered the need to accommodate exceptions processing and change management in the development of its current timeline?

4. If the TOM is unwilling to arrange for industry workshops as detailed in Question No. 2 above, how does it plan to reconcile the LNPA Transition with the industry's ongoing and concurrent IP Transition, including the work of the ATIS Testbeds Focus Group, the ATIS/SIP Forum IP-NNI Task Force and others that will certainly result in complex NANC Change Orders during the period of the LNPA Transition?