October 29, 2015

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.

Transition Oversight Plan

The latest version of the Transition Oversight Plan (“TOP”), dated August 31, 2015, is published on the public portion of the NAPM LLC’s website at www.NAPMLLC.org.

Stakeholder Outreach and Education

As discussed in the September 2015 Report, the NAPM LLC developed and finalized a Transition Outreach and Education Plan (“TOEP”) with the assistance of the Transition Oversight Manager (“TOM”) and the oversight of the FCC. Today, the NAPM LLC filed the TOEP, which is an Exhibit to the amended TOP that the NAPM LLC filed with the FCC on August 31, 2015, with the FCC.

Transition Oversight Manager

The TOM continued to advance the objectives of the LNPA transition program in October. Among other things, the TOM:

- Finalized the proposed NPAC data exchange file format specification and reviewed the requirements with the NAPM LLC and the LNPA;
- Finished defining transition project milestones and supporting checkpoints and assignment to the previously defined transition project work streams;

Developed draft mailing lists of TOEP outreach participants and implemented a means to gather industry feedback through the napmlc.org website;

Instituted an Information Request Governance Document to outline the criteria for permissible and impermissible information requests between the incumbent and incoming LNPA;

Created and reviewed with the NAPM LLC a Dispute Resolution Process for addressing disputes that arise between parties involved in the transition; and

Implemented a methodology for gathering, managing and communicating key project decisions made during the transition.

The TOM conducts weekly meetings with the NAPM LLC Transition Team, iconectiv and Neustar to coordinate activities and communication among the parties and to address ad hoc issues as they arise. These working meetings are used to identify, discuss and close tasks or "action items" required to advance the project objectives. The graph below depicts the progress achieved in addressing these action items since the last monthly report.

The TOM continues to track identified transition risks, including the following:

- Dates for key milestones are dependent on completion of the iconectiv master services agreement and the Neustar transition services contract; and
- Agreement on key transition requirements is necessary in order to complete the iconectiv master services agreement and the Neustar transition services contract.

Negotiations with iconectiv

As previously reported, the NAPM LLC and iconectiv initiated negotiations for a new Local Number Portability Administrator ("LNPA") contract on May 21, 2015, and the parties continue to meet regularly and conduct conference calls between meetings in order to complete negotiation of the terms and conditions as soon as possible.
**Negotiations with Neustar**

As explained in the NAPM LLC’s filing with the FCC on June 23, 2015, the NAPM LLC negotiated a statement of work 98 (“SOW 98”) for the cost recovery of the TOM in accordance with the FCC’s written confirmation filed as DA 15-799. Consistent with the terms of SOW 98, the current LNPA, Neustar, began billing service providers in October 2015 for cost recovery of the TOM. Additionally, the NAPM LLC initiated negotiation with Neustar for a transition services agreement in October, and will work expediently to bring that process to closure. The transition services agreement will address 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.

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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*