

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration</b>	)	<b>WC Docket No. 07-149</b>
	)	
	)	
<b>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 Management</b>	)	<b>WC Docket No. 09-109</b>
	)	
	)	
<b>Telephone Number Portability</b>	)	<b>CC Docket No. 95-116</b>
	)	

**REPLY COMMENTS OF ITTA –  
THE VOICE OF MID-SIZE COMMUNICATIONS COMPANIES**

ITTA – The Voice of Mid-Size Communications Companies (“ITTA”) hereby submits its reply comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) May 7, 2015 Public Notice<sup>1</sup> seeking comment on the North American Portability Management LLC’s (“NAPM”) Transition Oversight Plan (“Transition Plan”) relating to the Commission’s conditional selection of Telcordia Technologies, Inc. d/b/a iconectiv as the next local number portability administrator (“LNPA”).<sup>2</sup> Several parties have filed comments in

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<sup>1</sup> “Wireline Competition Bureau Seeks Comment on the North American Portability Management LLC’s Transition Oversight for Local Number Portability Administrator Contract,” Public Notice, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116, DA 15-554 (rel. May 7, 2015).

<sup>2</sup> Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116, Attach. (filed Apr. 27, 2015) (“Transition Plan”).

response to the Public Notice expressing concerns regarding the level of transparency and costs associated with the LNPA transition, among other things.<sup>3</sup> As explained below, ITTA agrees with other commenters in the proceeding that the Commission must ensure the LNPA transition process is open and transparent and minimizes costs and burdens for service providers and other stakeholders.

**I. THE COMMISSION MUST ENSURE OPENNESS AND TRANSPARENCY FOR ALL STAKEHOLDERS INVOLVED IN THE LNPA TRANSITION PROCESS**

The Transition Plan indicates a willingness to engage in outreach efforts with “a broad range of stakeholder groups,” particularly smaller carriers, in order to allow for “widespread participation” in the transition process.<sup>4</sup> However, the Transition Plan indicates that the NAPM will rely primarily on the North American Numbering Council (“NANC”) as a forum for stakeholder engagement and discussions.<sup>5</sup> The NANC only meets four times a year, which may not present adequate opportunity for interested stakeholders to be fully engaged and involved in the various steps involved in the transition.

The Commission must take an active role in ensuring both transparency and public outreach and engagement throughout the LNPA transition process by maximizing opportunities for stakeholders, including small and mid-size carriers that may not previously have been

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<sup>3</sup> See, e.g., Comments of NTCA – The Rural Broadband Association, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (filed May 21, 2015), at 2-5 (“NTCA Comments”); Comments of the Competitive Carriers Association, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (filed May 21, 2015), at 2-3; Comments of the LNP Alliance, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (filed May 21, 2015), at 3-7, 9-10 (“LNP Alliance Comments”); Comments of John Staurulakis, Inc., WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (filed May 21, 2015), at 3-4; Comments of the Open Technology Institute at New America, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (filed May 21, 2015), at 3-8; Joint State Commissions Comments, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (filed May 21, 2015), at 1-2.

<sup>4</sup> Transition Plan at 2, 4.

<sup>5</sup> *Id.* at 5.

involved and who do not hold a seat on the NANC, to meaningfully participate and provide their input. Commenters have suggested, for instance, that the Commission create opportunities for industry members to engage in two-way communications with the NAPM, the Transition Oversight Manager, and other federal, state, and local stakeholders regarding the transition, such as through meetings and webinars hosted by the NAPM and/or the Transition Oversight Manager at appropriate intervals or milestones.<sup>6</sup> Commenters also have suggested that the Commission ensure additional representation on the NAPM to ensure the needs and interests of carriers of all sizes are considered.<sup>7</sup> These and other proposals that would foster an open dialogue among interested stakeholders regarding the progress of and/or concerns with the LNPA transition merit consideration. The Commission must be fully committed to making sure that all stakeholders, including small and mid-size carriers, have input into the process at every stage so that any concerns they may have are adequately addressed.

## **II. THE COMMISSION MUST ENSURE THE TRANSITION DOES NOT CREATE UNNECESSARY COSTS AND BURDENS FOR STAKEHOLDERS**

The Transition Plan does not include a discussion regarding the expenses for testing, training, process development, and other costs associated with the transition. Thus, the precise magnitude of direct and indirect costs for service providers and other stakeholders is unknown at this time. Given that the Transition Plan is devoid of any detail on transition costs and how such costs will be apportioned among the various entities involved, the Commission must monitor, scrutinize, and seek to minimize the costs associated with the transition to the maximum extent possible to ensure that its expectations regarding mitigating burdens and costs on affected entities by selecting a new LNPA are met.

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<sup>6</sup> See LNP Alliance Comments at 7.

<sup>7</sup> See NTCA Comments at 4.

It also is important for the Commission to ensure that stakeholders are aware of the likely financial impact relating to the transition. As discussed above, the transition process must be open and transparent. With stakeholder engagement regarding the expenses associated with various aspects of the process, the Commission can better maximize efficiency and minimize the expense associated with the transition. To that end, the NAPM, the NANC, and the Transition Oversight Manager should reach out to and involve service providers and their industry representatives in planning transition requirements, schedules, and testing appropriate to their needs. Doing so will help ensure that the transition is as smooth and efficient as possible and that the process does not create unnecessary costs or burdens for stakeholders.

### **III. CONCLUSION**

ITTA believes the Commission must take an active role in ensuring that the LNPA transition process is open and transparent and provides sufficient opportunities for interested stakeholders to participate in a meaningful way. The Commission also must ensure that the transition does not create unnecessary costs and burdens for service providers and other stakeholders.

Respectfully submitted,

By: /s/ Genevieve Morelli

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