

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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

REPLY COMMENTS OF COMPTTEL

COMPTTEL, through undersigned counsel, hereby submits these replies to the Comments filed on the North American Number Portability Management LLC's Transition Oversight Plan For Local Number Portability Administrator Contract.¹ There are several common and recurrent themes found in the Comments with which COMPTTEL agrees: the critical need to both solicit and obtain feedback and participation during the transition process from all stakeholders, including, but not limited to, small providers, competitive carriers, rural carriers, state regulators and consumers; the critical need for proactive Commission oversight of the transition process

¹ See Public Notice, Wireline Competition Bureau Seeks Comment on the North American Number Portability Management LLC's Transition Oversight Plan For Local Number Portability Administrator Contract, DA 15-554 (rel. May 7, 2015).

and contract negotiations; and the critical need for all parties involved in the transition (NAPM, the Transition Oversight Manager, Neustar and iconectiv) to mitigate risks and to control the costs that will be borne by stakeholders.²

The Comments are consistent with the Commission’s discussion of each of these issues in its Order approving iconectiv as the next Local Number Portability Administrator (“LNPA”) subject to the negotiation of contract terms that the Commission finds acceptable.³ As the Commission’s Order also recognizes, the transition process must incorporate explicit components addressing, with specificity, performance benchmarks in the areas of security and reliability, testing validation, verification and production readiness.⁴ Such transition plan details will facilitate the meaningful feedback and participation by stakeholders that is so necessary to ensure the success of the transition in all essential areas.

Due to the important role that number portability plays in keeping telephone subscribers connected, facilitating consumers’ ability to switch providers and promoting competition, COMPTEL is confident that the Commission will use its oversight authority to ensure that the transition of LNPA responsibilities from Neustar to iconectiv is as transparent, effective and seamless as possible and that stakeholders are kept fully informed of the processes each step of the way.

² Comments were filed by the LNP Alliance, John Staurulakis, Inc., NTCA—The Rural Broadband Association, the Open Technology Institute at New America, the Competitive Carriers Association and the Idaho, Maine and Nebraska Public Utilities/Service Commissions.

³ *In the Matter of Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration*, WC Docket No. 07-149, Order, FCC 15-35, at ¶¶ 1-2, 146-159, 193-194 (rel. Mar. 27, 2015).

⁴ *Id.* at ¶159.

Respectfully submitted,

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June 1, 2015