In the Matter(s) of:

Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute a Competitive Bidding for Number Portability Administration, and to End the LLC’s Interim Role in Number Portability Administration Contract Management

Telephone Number Portability

North American Portability Management, LLC’s Transition Oversight Plan for Local Number Portability Administrator Contract

REPLY COMMENTS OF THE NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS ON THE NORTH AMERICAN PORTABILITY MANAGEMENT LLC TRANSITION PLAN AND THE DRAFT VOTING TRUST AGREEMENT

On March 18, 2015, NARUC filed an ex parte with the Commission urging the agency to:

[B]efore finalizing any transition plan, seek input from interested stakeholders, including NARUC’s member public service commissions, which regularly interact with the current administrator, on any draft transition plan’s components.

NARUC commends the FCC for, on May 7, 2015, seeking input from interested stakeholders on the North American Portability Management LLC’s (NAPM) Transition Oversight Plan for Local Number Portability Administrator Contract.  


Initial comments were filed May 21, 2015 on the NAPM plan, online at: http://apps.fcc.gov/ecfs/document/view?id=60001044932.

NARUC endorses the initial comments filed by representatives from member commissions in Idaho, Maine, and Nebraska. Those comments support the NAPM LLC’s determination, at page 5 of the transition plan, to “engage the NANC as a mechanism through which industry stakeholders, including small providers and state regulators, can participate and ensure that their concerns have been adequately addressed”.

The comments, at page 1, specifically suggest that:

[T]o ensure input from the States in this process. . . the Local Number Portability Administration Working Group (LNPA-WG), which is under the direction of the NANC, [should] serve as the forum for the industry stakeholders, including small providers and state regulators, to raise technical concerns of the transition. The LNPA-WG has a long . . . history of providing NANC guidance regarding impacts of changes to Local Number Portability that are operational and technical. {emphasis added}

The LNP Alliance made a similar suggestion.

The Commission should provide clear direction to the LNPA Working Group as to its role in the transition process. The LNP Alliance recommends that the direction should be that the LNPA Working Group will act as a forum to create opportunities for industry members, and particularly small to medium-sized providers, to engage in a two-way exchange of information with the NAPM, the Manager, and other federal, state, and local

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5 See, Letter from Todd D. Daubert, Counsel to NAPM LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 and 09-109, CC Docket No, 95-116, (filed Apr. 27, 2015), at p. 5.

stakeholders about the progress and/or concerns with the Transition. {emphasis added}

NARUC appreciates that the FCC recognizes the need for transparency, as well as, the need to allow industry stakeholders, including small providers and State regulators, the opportunity to participate and ensure that their concerns have been adequately addressed.

Respectfully submitted,

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