

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

<i>In the Matter(s) of:</i>)	
)	
<i>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</i>)	WC Docket No. 09-109
)	
<i>Telephone Number Portability</i>)	WC Docket No. 07-149
)	
<i>North American Portability Management, LLC's Transition Oversight Plan for Local Number Portability Administrator Contract</i>)	CC Docket No. 95-116
)	
)	DA 15-554

**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 parte¹ 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.²

¹ See *Letter from J. Ramsay, NARUC, to FCC Chairman Wheeler*, WC Docket Nos. 07-149 and 09-109, and CC Docket No. 95-116 (filed March 18, 2015) at: <http://apps.fcc.gov/ecfs/comment/view?id=60001026938>.

² See, *Wireline Competition Bureau Seeks Comment on the North American Portability Management LLC's Transition Oversight Plan for Local Number Portability Administrator Contract*, DA 15-554 in WC Docket Nos. 07-149 and 09-109, and CC Docket No. 95-116), at: <http://apps.fcc.gov/ecfs/document/view?id=60001044932>.

Initial comments were filed May 21, 2015 on the NAPM plan,³ 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.⁴ 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".⁵

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.⁶

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*

³ See, *The North American Portability Management LLC Transition Oversight Plan*, online at: <http://apps.fcc.gov/ecfs/document/view?id=60001044932>.

⁴ See, *Joint State Commission's Comments*, WC Docket Nos. 07-149 and 09-109, CC Docket No, 95-116 (filed May 21, 2015), at: <http://apps.fcc.gov/ecfs/comment/view?id=60001032284>.

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.

⁶ See, *Comments of the LNP Alliance on the North American Portability Management LLC Transition Plan and the Draft Voting Trust Agreement*, WC Dockets 09-109 & 07-149, and CC Docket No. 95-116 (filed May 21, 2014), at 6, at: <http://apps.fcc.gov/ecfs/comment/view?id=60001032412>

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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June 1, 2015