



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

August 22, 2017

The Honorable Peter T. King
U.S. House of Representatives
339 Cannon House Office Building
Washington, D.C. 20515

Dear Congressman King:

Thank you for your inquiry about the security requirements for the Number Portability Administration Center. These requirements are extremely important, and I take them very seriously.

Let me start by saying that I too was alarmed at the security violations discovered in 2015 that had been committed by the new vendor, Telcordia d/b/a iconectiv. That's why I demanded a full and complete review of what happened as well as a satisfactory mitigation of all security concerns. In close coordination with the national security agencies, the Commission then required Telcordia to discard all pre-contract work, including that performed by non-U.S. citizens. Last November, Telcordia confirmed that this had been done and provided details on how.

More generally, security for this critical component of our communications infrastructure is paramount. The change in the Local Number Portability Administrator (LNPA) provided the Commission with an opportunity to review security and reliability requirements and to implement a rigorous audit program which monitors and ensures compliance with the security requirements, backstopped by robust enforcement tools. Our March 27, 2015 Order provisionally selecting Telcordia committed to addressing the security requirements provided by Executive Branch entities with expertise in and responsibility for law enforcement and national security matters. And the Commission required Telcordia and the North American Portability Management LLC (NAPM) to include terms and conditions in the Master Services Agreement that would ensure the secure and reliable operation of the number portability system.

The resulting Agreement includes granular detail regarding cybersecurity, supply chain risk management, and insider threat management, among other security and reliability measures. These provisions incorporate the National Institute of Standards and Technology cybersecurity risk management framework and supply chain risk management practices, as well as other standards-based requirements. For these reasons, the Commission approved the draft Agreement, and the Agreements in each of the seven regions were executed on August 8, 2016. Furthermore, the Agreement includes rigorous oversight measures and explicitly requires that only appropriately vetted U.S. citizens work on the project. The Commission sought, and continues to seek, the most secure and reliable operation of the number portability system.

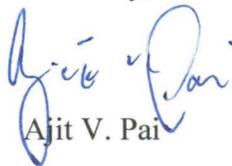
The Commission has already begun implementing a rigorous oversight process in conjunction with our federal partners, including the Federal Bureau of Investigation and the

Department of Homeland Security, as well as the NAPM; and the process will remain in place throughout the term of the contract. In 2016, the FCC conducted two on-site visits to the LNPA facilities; the first occurred in April 2016 and the second occurred in November 2016. Both of these meetings were comprehensive and satisfactorily addressed the concerns of Commission staff. Further, Telcordia's Security Plan, which is included in the Agreement, will evolve over time as the security threat environment evolves. Based on our observations to date, Telcordia has effectively engaged in post-selection risk reduction activities to address the evolving cybersecurity threat environment. As to your specific concern regarding third-party review, Telcordia has agreed to use an independent third-party to perform regular audits of both the Security Plan and its implementation.

Going forward, the Commission, in coordination with our federal law enforcement and national security partners and the NAPM, will continue to closely oversee the LNPA transition. Clear lines of authority, risk responsibility, and accountability are in place with the NAPM, which has direct and primary oversight of the LNPA, with the Commission providing an additional level of oversight. Moreover, the Commission will take all appropriate steps to ensure that these security requirements continue to be met moving forward. I would be happy to have Commission experts in this matter brief you or your staff on the Agreement's security provisions, our continued oversight of the transition, and our work with our federal partners.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,



Ajit V. Pai

P.S. Thank you for your letter, Congressman! Please don't hesitate to get in touch if you need help with any other FCC-related matters.