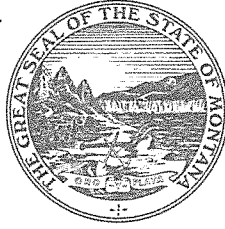


Montana Public Service Commission



Travis Kavulla - Vice Chairman
District 1

June 7, 2018

Kris Monteith
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Submission of Final Report, *Findings Related to ATIS Models on Nationwide Number Portability*, by the North American Numbering Council

Dear Ms. Monteith:

By this letter, I am submitting to the above-titled report on behalf of the North American Numbering Council (NANC).

This report grapples with probably the most technically fraught of the several topics that have recently been referring to the NANC. The working group associated with Nationwide Number Portability (NNP) worked to execute the tasks which it was assigned, which as described in your December 7, 2017, letter included a review of the four NNP models and proposed next steps to advance NNP.

The NNP working group, through its weekly teleconferences, worked through each of the NNP models. It found one to be antiquated, but the others are characterized by their relative merits and disadvantages. The report details each of these serially. However, the working group was unable to make any conclusive recommendation regarding the remaining NNP models, and NANC forwards this analysis accordingly.

It became obvious at the NANC's May 29, 2018 meeting that there existed strong, differing opinions on this subject. I refer you to transcript of this meeting, which will soon be prepared, for a verbatim depiction of this discussion. The deliberations conducted at that meeting led to several additional changes to the draft final report.

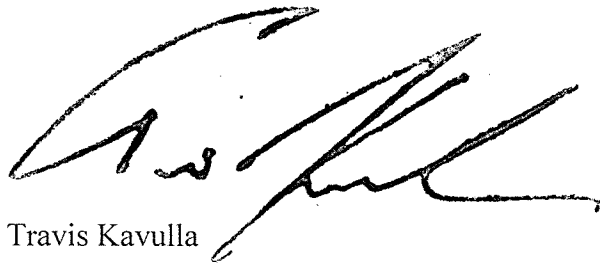
Regrettably, the working group was not able to conclude an especially detailed look at the costs of implementing NNP through the various approaches. There are clearly costs that would be incurred by any implementation of NNP, and the report specifies what these might be, without engaging in a calculation of them. Certain NNP models appear nearly inexorably linked to the larger trend of a transition to IP interconnection. Given this context, the report considers whether it is worth adopting partial NNP, with a recognition that as technology replacement proceeds, it will eventually become easier to accomplish the goal of a full NNP. Meanwhile, the report concludes that further work should be undertaken to accomplish a clearer view of which of the NNP pathways may present a clear benefit net of its costs.

The report, while it does not endorse any single NNP model, does specify further work toward examining each of the feasible ones. Some of this work involves a policy and analysis dimension which the Commission itself should conduct. The industry is divided on aspects of NNP, and in my opinion this is a topic which requires a clearer regulatory lead in order to obtain momentum, should the Commission judge NNP to be a policy that significantly furthers the public interest.

The NANC stands ready to undertake any work that the WCB may refer to us, either through the existing NNP working group or through a new subcommittee. In my opinion, such a referral would be most productive if it was precisely scoped around certain elements of the follow-on work the report suggests.

I thank the NNP working group for its consideration of this complex issue. Please do not hesitate to write or telephone with any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read 'Travis Kavulla', written in a cursive style.

Travis Kavulla

Chairman, North American Numbering Council