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February 1, 2018

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Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Telephone Number Portability, et al., WC Docket Nos. 07-149 &  
09-109, CC Docket No. 95-116

Dear Ms. Dortch:

I write on behalf of Neustar, Inc. ("Neustar") in response to the unsigned, undated "summary" filed on January 29, 2018 by the North American Portability Management LLC's ("NAPM") attorney Todd Daubert at the request of PwC Advisory Services LLC in its capacity as the Transition Oversight Manager ("TOM").<sup>1</sup> This summary repeats false allegations about Neustar's conduct during the Local Number Portability Administration ("LNPA") transition that Neustar unequivocally denies and will address in the appropriate forum.<sup>2</sup> It also concedes, for the first time, that the NAPM and TOM have not prepared a technically and operationally feasible contingency rollback solution if the transition to iconectiv fails.

The TOM Summary states that it will use an industry-led manual rollback solution in the event of a "catastrophic failure" because of "technical, resource, schedule, and

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<sup>1</sup> Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 and 09-109, CC Docket No. 95-116 (filed Jan. 29, 2018) ("TOM Summary").

<sup>2</sup> The NAPM accuses Neustar of acting in bad faith, intentionally delaying the transition, and refusing to comply with a binding obligation to accept the contingency rollback plan proposed by the NAPM and iconectiv. These accusations are baseless and false. Neustar not only managed the NPAC successfully for two decades, but it also has engaged in good faith with the NAPM and with the TOM throughout this process. Neustar is defending the interests of telecommunications providers and consumers by refusing to accept an unworkable contingency plan that was conceived without Neustar's input and that threatens to create a situation where neither iconectiv nor Neustar can provide accurate and reliable administration of local number portability.

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contractual constraints.”<sup>3</sup> In other words, because the NAPM and TOM have poorly managed this transition, the Commission and the entire telecommunications industry will assume the risk of an unproven, newly-coded LNPA database without the ability to rollback to a proven service provider, which, since October 2016, has offered to support an automated solution with none of the deficiencies of the NAPM’s proposed manual rollback for as little as \$1.5 million.

But the TOM Summary obfuscates the real threat that its manual contingency rollback poses: there will be no alternative database service to rollback to. Although the TOM refers to “an industry capability to resubmit transactions,”<sup>4</sup> the NAPM negotiated a contract amendment with Neustar to discontinue service in each region once iconectiv begins its service.<sup>5</sup> Even if a manual rollback could work, which Neustar doubts, there will be no working database to provide LNPA service once iconectiv turns on its service in a given region of the country. As such, if iconectiv’s system fails and Neustar’s system is no longer operational, the contingency plan will result in massive consumer disruption.

Consistent with the Commission’s admonition that “any transition involving important communications infrastructure [like the NPAC] should be undertaken with care[,]”<sup>6</sup> the Commission should compel the TOM and NAPM to answer two simple questions. First, how will this manual process mitigate the substantial risk of consumer disruption? Second, why is this manual process appropriate or prudent given alternative solutions? Answers to these questions will help the Commission ensure the integrity of what it has unanimously described as a “national resource.”<sup>7</sup>

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<sup>3</sup> TOM Summary at 2.

<sup>4</sup> *Id.*

<sup>5</sup> Change Order No. 4 to Amendment 97 to Contractor Services Agreement for Number Portability Administration Center/Service Management System between Neustar, Inc. and the North American Portability Management LLC, § 5.3.

<sup>6</sup> *Petition of Telcordia Technologies, Inc. to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration*, Order, 30 FCC Rcd. 3082, ¶ 158 (2015).

<sup>7</sup> *Id.*



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Please do not hesitate to contact me if you have questions.

Very truly yours, .

A handwritten signature in blue ink, appearing to read "T. Navin", written over the closing "Very truly yours, .".

Thomas J. Navin  
*Counsel to Neustar, Inc.*

cc Claude Aiken  
Amy Bender  
Matthew Berry  
Theresa Cavanaugh  
Nicholas Degani  
Neil Dellar  
Michele Ellison  
Thomas M. Johnson, Jr.  
Marilyn Jones  
Travis Litman  
Kris Monteith  
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