

February 5, 2018

VIA ECFS

Ms. Kris Anne Monteith
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Monteith:

The North American Portability Management LLC ("the NAPM LLC"), by its attorneys, writes to express support for the letter filed by Telcordia Technologies, Inc. d/b/a iconectiv ("iconectiv") on January 29, 2018 in the above-captioned proceedings.¹ In the letter, iconectiv objects to Neustar's request that the Commission fully disclose Article 19 of the Master Services Agreement ("MSA") between iconectiv and the NAPM LLC. As iconectiv articulated, Neustar's request is without legal justification and if granted, would undermine the timely transition of the Local Number Portability Administrator.²

Neustar's request that the Commission remove confidential protection for Article 19 is contrary to long-standing, means-tested procedures for handling sensitive information in service of the agency's policy goals. As the Commission acknowledged when dismissing Neustar's 2016 Application for Review of the *Second Protective Order*³, the protections in place "help balance the sensitive nature of confidential filings, while being mindful of the right of the public to participate in this proceeding in a meaningful way."⁴

¹ Letter from John T. Nakahata, Counsel to iconectiv, to Kris Anne Monteith, Chief, FCC Wireline Competition Bureau (Jan. 29, 2018) ("iconectiv Letter").

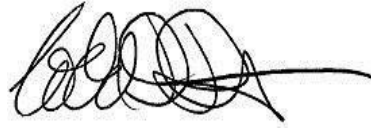
² See *id.* at 2.

³ *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Second Protective Order, 31 FCC Rcd. 2297 ("Second Protective Order").

⁴ *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, 31 FCC Rcd. 8444, 8453, para. 25 (2016).

This proceeding continues to necessitate such a balancing act. The NAPM LLC agrees with iconectiv—Article 19 contains provisions that, if made public, could be leveraged by Neustar to delay the transition. As a result, consumers and the industry would suffer.⁵ Accordingly, the NAPM LLC respectfully urges the Commission to deny Neustar's request and maintain Article 19's confidential designation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd D. Daubert', with a long horizontal flourish extending to the right.

Todd D. Daubert
Counsel to the NAPM LLC

cc: Thomas J. Navin, *Counsel for Neustar*
James C. Falvey, *Counsel for New America's Open Technology Institute and the LNP Alliance*
Michele Ellison
Neil Dellar
Ann Stevens
Michelle Sclater