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July 6, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: *Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration and to End the NAPM LLC's Interim Role in Number Portability Administration Contract Management*, WC Docket No. 09-109; *Telephone Number Portability*, CC Docket No. 95-116

Dear Ms. Dortch:

We write on behalf of Neustar, Inc., to express concerns with the manner in which the Commission has conducted the Local Number Portability Administrator (“LNPA”) proceeding. At every phase, Neustar has been disadvantaged by arbitrary decisions behind closed doors that tipped the scales in favor of Ericsson’s wholly owned subsidiary Telcordia Technologies, Inc., d/b/a iconectiv (“Ericsson”).¹

In addition, the Commission is now poised to embrace a decision with all of the transition risk but none of the “cost savings over the existing contract.”² One option available to the Commission in March 2015 would have been to retain Neustar as the LNPA at its best offer price, which would have resulted in significant cost savings over Neustar’s existing contract, but with none of the transition risk. Given the extraordinary transition delays and security violations,³ however, the FCC now appears committed to choosing a result in which the American people realize no cost savings over Neustar’s existing contract but accept all of the transition risk. Indeed, the transition is now

¹ We do not reiterate here Neustar’s well-documented objections to the Commission’s selection of Ericsson as the next LNPA, which is currently on appeal. *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration*, Order, 30 FCC Rcd 3082 (2015) (“*Selection Order*”), *pet. for review pending Neustar Inc. v. FCC*, No. 15-1080 (D.C. Cir.). Nor do we reiterate Neustar’s objections to the Second Protective Order. *See* Application of Neustar, Inc. for Review of Second Protective Order, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116 (filed Apr. 11, 2016). Those objections remain in full force and have not been answered by any of Ericsson’s filings.

² *Selection Order* at 89 (Statement of Chairman Wheeler).

³ *See* Ellen Nakashima, *Security of Critical Phone Database Called into Question*, WASH. POST (Apr. 28, 2016), <http://wpo.st/HuvY1>.

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predicted to “extend[] significantly beyond previously expected timeframes.”⁴ If the Commission continues down this path, its effort will not “le[a]d to a better deal for American consumers.”⁵ Rather, given all that has happened, it will be a raw deal for consumers – a decision that carries significant national security questions and transition risk to critical telecommunications infrastructure that Americans depend upon every day for reliable communications. In all respects, Neustar’s best offer remains the better choice – technically, operationally, and economically.

Equally concerning, the Commission appears content to ignore issues that are crucial to the transition to a new LNPA. It would be arbitrary and capricious for the Commission to approve the Master Services Agreement (“MSA”) between Ericsson and the North American Portability Management LLC (“NAPM”) without addressing these issues.⁶ It would also be improper for the Commission to “act on the basis of undisclosed evidence that was never made a part of the record before the agency.”⁷ We urge the Commission to consider these issues carefully, fully, and *on the record*, before approving any MSA with Ericsson.

1. Ericsson’s conceded violations of its national security commitments and apparent lack of candor must be addressed by the Commission on the record.

As Neustar explained in its motion to show cause, the Commission must determine, on the record, whether Ericsson made material misrepresentations about the security of the NPAC in order to improve its prospects of winning the LNPA contract. None of the recent filings by Ericsson, the NAPM, or the FBI addresses the concerns raised in

⁴ Letter from Todd D. Daubert, Counsel, NAPM, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket Nos. 09-109 & 07-149, at 2 (filed June 29, 2016).

⁵ *Selection Order* at 89 (Statement of Chairman Wheeler).

⁶ *Bus. Roundtable v. SEC*, 647 F.3d 1144, 1148-49 (D.C. Cir. 2011); *FiberTower Spectrum Holdings, LLC v. FCC*, 782 F.3d 692, 700 (D.C. Cir. 2015); *Sorenson Commc’ns Inc. v. FCC*, 755 F.3d 702, 709-10 (D.C. Cir. 2014); *Int’l Union, United Mine Workers of Am. v. Mine Safety & Health Admin.*, 626 F.3d 84, 94 (D.C. Cir. 2010).

⁷ *United States v. Florida E. Coast Ry. Co.*, 410 U.S. 224, 245 (1973) (citing *Ohio Bell Telephone Co. v. Public Utilities Comm’n*, 301 U.S. 292, 304-305 (1937)); *Morgan v. United States*, 304 U.S. 1 (1938); *US Lines, Inc. v. Fed. Mar. Comm’n*, 584 F.2d 519, 523, 540 (D.C. Cir. 1978); *Ralpho v. Bell*, 569 F.2d 607, 628 (D.C. Cir. 1977).

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Neustar’s motion to show cause.⁸ If Ericsson deliberately misled the Commission, Ericsson must be disqualified from serving as LNPA.

Moreover, the Commission must require Ericsson to file on the record all *ex parte* communications with the Commission relating to Ericsson’s compliance with the national security commitments and obligations reflected in the *Selection Order*.⁹ If anything, the competitive nature of the LNPA selection proceeding demands that *ex parte* contacts be disclosed and subject to public scrutiny.¹⁰ Indeed, “adversarial comment is particularly critical where, as here, Ex parte communications are made by a party interested in securing the Commission approval necessary for the legality of its contracts.”¹¹

2. The Commission must update its fundamentally flawed evaluation of the costs of the two bids in light of delays caused by Ericsson’s national security breaches.

The Commission must update its cost evaluation of the LNPA transition from Neustar to Ericsson in light of recent developments that show the transition will take significantly longer than the Commission originally concluded. As Neustar has argued, the Commission’s selection of Ericsson was fundamentally flawed because the Commission

⁸ See Letter from Thomas J. Navin and Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116 (filed June 29, 2016).

⁹ See Letter from Thomas J. Navin and Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116, at 3 (filed May 9, 2016); Letter from Thomas J. Navin and Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116, at 2-3 (filed May 2, 2016). Ericsson has argued that *Home Box Office Inc. v. FCC*, 567 F.2d 9 (D.C. Cir. 1977), is inapposite because it was decided in the context of a rulemaking proceeding. In *U.S. Lines, Inc. v. Fed. Mar. Comm’n*, 584 F.2d 519 (D.C. Cir. 1978), however, the court explained that “however we label the proceedings involved here and in our earlier cases, the common theme remains: that Ex parte communications and agency secrecy as to their substance and existence serve effectively to deprive the public of the right to participate meaningfully in the decisionmaking process.” *Id.* at 540.

¹⁰ *Sierra Club v. Costle*, 657 F.2d 298, 400 (D.C. Cir. 1981) (“Where agency action resembles judicial action, where it involves formal rulemaking, adjudication, or quasi-adjudication among ‘conflicting private claims to a valuable privilege,’ the insulation of the decisionmaker from ex parte contacts is justified by basic notions of due process to the parties involved.” (quoting *Sangamon Valley Television Corp. v. United States*, 269 F.2d 221, 224 (D.C. Cir. 1959))).

¹¹ *U.S. Lines, Inc.*, 584 F.2d at 542.

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failed reasonably to evaluate the overall costs of the competing LNPA proposals.¹²

*****BEGIN HIGHLY CONFIDENTIAL*** ***END HIGHLY**

CONFIDENTIAL*** the Commission’s evaluation of the competing proposals warrants reexamination.

The Commission’s evaluation of costs in the *Selection Order* was based on an unsupported assumption concerning the duration of the transition from Neustar to Ericsson that is affirmatively contradicted by the record.¹³ Specifically, the Commission’s assumption that the transition *****BEGIN HIGHLY CONFIDENTIAL*** ***END HIGHLY CONFIDENTIAL***** was erroneous. As Neustar explained, “[n]othing in the record before the Commission supports that assumption. On the contrary, the record establishes that the transition would take at least two and a half years.”¹⁴ Neustar has thoroughly demonstrated why transition costs and risks likely will overwhelm any potential savings from awarding the contract to Ericsson.¹⁵

Transition delays caused by Ericsson’s violation of the *Selection Order* have bolstered Neustar’s argument and undermined the rationale for selecting Ericsson as the next LNPA. *****BEGIN HIGHLY CONFIDENTIAL*** ***END HIGHLY CONFIDENTIAL***** What is more, recent statements on behalf of the NAPM and TOM demonstrate that there is no definite end in sight. The NAPM stated in a recent letter that the “baseline for the timelines” will not even be established until the FCC

¹² See Brief of Petitioner Neustar, Inc., USCA Case No. 15-1080, at 59-66 (filed Sept. 21, 2015).

¹³ See *id.* at 59.

¹⁴ See *id.* at 62.

¹⁵ See, e.g., Letter from Aaron M. Panner, Counsel for Neustar, Inc., to Marlene H. Dortch, FCC, CC Docket No. 95-116, WC Docket No. 09-109 (filed Jan. 26, 2015) (attaching Hal J. Singer, Addendum to “Estimating the Costs Associated with a Change in Local Number Portability Administration (Jan. 26, 2015)); Hal Singer, *Estimating the Costs Associated with a Change in Local Number Portability Administration*, March 2013, available at <http://www.ei.com/downloadables/SingerCarrierTransition.pdf>; Standish Grp. Int’l, Big Bang Boom, at 2 (2014), available at blog.standishgroup.com/BigBangBoom.pdf; Letter from Thomas L. McGovern III, Counsel to Neustar, Inc., to Marlene H. Dortch, FCC, CC Docket No. 95-116; WC Docket No. 09-109 (Jan. 28, 2015) (attaching Smith & Associates, *Technical Evaluation of the Next Generation NPAC/SMS Proposals* (Jan. 28, 2015)); Letter from Michele Farquhar, Counsel to Neustar, Inc., to Marlene H. Dortch, FCC, CC Docket No. 95-116, WC Docket No. 09-109, at 1 n.1 (filed Jan. 12, 2015) (citing comments and letters); Letter from Aaron M. Panner, Counsel for Neustar, Inc., to Marlene H. Dortch, FCC, CC Docket No. 95-116, WC Docket No. 09-109 (filed Dec. 9, 2014).

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approves the MSA,¹⁶ and the TOM explained in a recent transition presentation that “timing is dependent on final agreement on the MSA transition schedule” and that “updates” regarding timing will not be provided until then.¹⁷ Most recently, the NAPM admitted that the transition “is extending significantly beyond previously expected timeframes.”¹⁸

The indefinite extension of the transition drastically alters the Commission’s evaluation of the two bids in the *Selection Order*.¹⁹ In the *Selection Order*, the Commission *****BEGIN HIGHLY CONFIDENTIAL*** **END HIGHLY CONFIDENTIAL***** Moreover, this calculation does not include the increased costs incurred from developing, creating, and debugging Ericsson’s system and transitioning the industry – including the additional costs to be negotiated and incurred under transition services agreements – that an extended transition will necessarily impose. Given an extra year and a half of transition,²⁰ at a minimum, these costs could be significantly greater than the amount the Commission assumed in the *Selection Order*, *****BEGIN HIGHLY CONFIDENTIAL*** **END HIGHLY CONFIDENTIAL*****

The Commission has an obligation to reexamine its selection of Ericsson because the purported cost disparity between the bids was critical to the Commission’s decision to select Ericsson.²¹ The Commission concluded that “both bidders are qualified to serve as LNPA” and that neither bid was preferable on technical or managerial grounds.²² As a result, the Commission purportedly selected Ericsson based on an assessment of the costs

¹⁶ Letter from Todd D. Daubert, Counsel, NAPM, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket Nos. 09-109 & 07-149, at 3 (filed June 2, 2016).

¹⁷ LNPA Transition Outreach and Education Plan (TOEP) Frequently Asked Questions, LNPA Transition Oversight Manager (last visited June 6, 2016), *available at* https://www.napmllc.org/Docs/npac/ref_docs/REP_20160525_TOEP%20FAQ_v1.0.pdf.

¹⁸ Letter from Todd D. Daubert, Counsel, NAPM, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket Nos. 09-109 & 07-149, at 2 (filed June 29, 2016).

¹⁹ See *Selection Order* ¶ 153 n.535.

²⁰ See Letter from Todd D. Daubert, Counsel, NAPM, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket Nos. 09-109 & 07-149, at 2 (filed June 29, 2016).

²¹ *Bechtel v. FCC*, 957 F.2d 873, 881 (D.C. Cir. 1992).

²² *Selection Order* ¶ 65; see *id.* ¶¶ 65-133. Neustar has challenged this conclusion as incorrect in light of the reasonably predicted costs of implementation that are now being incurred.

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of the two bids, including the costs that would be incurred in a transition to Ericsson. Because those transition costs have increased significantly to the point where a new cost calculation *****BEGIN HIGHLY CONFIDENTIAL***** *****END HIGHLY CONFIDENTIAL***** the Commission must reexamine the competing proposals before proceeding with the LNPA transition.

3. The Commission’s actions have undermined the integrity of the competitive bidding.

The concealment of the facts surrounding Ericsson’s national security violations is not the first time that action by the Commission has called into question the fundamental fairness of this proceeding. It is just the latest procedural impropriety to undermine the integrity of the Commission’s selection of the next LNPA. These improprieties have prejudiced Neustar’s ability to compete fairly for the LNPA contract.²³ Had the Commission conducted a notice-and-comment rulemaking proceeding, as Neustar repeatedly urged, it is likely that the Commission could have avoided these procedural improprieties.

Summer 2012/Winter 2013. The Commission apparently negotiated with the NAPM in secret over the content of the LNPA procurement documents. The Bureau initially explained that the final RFP would be issued after “Commission review of the comments.”²⁴ But when the Bureau released the final RFP, it neither explained the changes made nor described the comments.²⁵ This suggests that the changes were based on secret negotiations between the Bureau and the NAPM rather than based on the publicly filed comments.

Spring 2013. The Commission extended the bid deadline after Ericsson failed to meet the original deadline.²⁶ The NAPM explained that it extended the deadline “[p]ursuant to

²³ See *L-3 Commc’ns EOTech, Inc. v. United States*, 83 Fed. Cl. 643, 651 (2008); *Sys. Plus, Inc. v. United States*, 69 Fed. Cl. 757, 767 (2006).

²⁴ *Wireline Competition Bureau Seeks Comment on Procurement Documents for the Local Number Portability (LNP) Administration Contract*, Public Notice, 27 FCC Rcd 11771 (Wireline Comp. Bur. 2012).

²⁵ See *Wireline Competition Bureau Announces Release of Procurement Documents for the Local Number Portability (LNP) Administration Contract*, Public Notice, 28 FCC Rcd 1003 (Wireline Comp. Bur. 2013).

²⁶ See Comments of Neustar, Inc., WC Docket No. 09-109, CC Docket No. 95-116, at 65-69 (filed July 25, 2014) (“Neustar Comments”).

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the directions of the [Bureau].”²⁷ ***** BEGIN CONFIDENTIAL INFORMATION *** ** END CONFIDENTIAL INFORMATION***** The NAPM’s website was later altered to state that the extension was made with the “consent of the FCC,” implying that the Bureau asked for the alteration to avoid responsibility.

Fall/Winter 2013. The FoNPAC did not consider Neustar’s best offer as a result of Commission intervention.²⁸ The NAPM initially did not explain why the offer was rejected ***** BEGIN CONFIDENTIAL INFORMATION *** ** END CONFIDENTIAL INFORMATION *****.²⁹ The Commission later said only that the FoNPAC declined to entertain additional bids and that the Commission itself “was not presented with details about Neustar’s lower bid until shortly before the [*Selection Order*] was released.”³⁰ But this was disingenuous. ***** BEGIN CONFIDENTIAL INFORMATION *** ** END CONFIDENTIAL INFORMATION ***** Thus, the Commission received the offer about a year and a half earlier. Moreover, the FoNPAC decided not to entertain additional bids *only because* of Commission intervention. *****BEGIN CONFIDENTIAL INFORMATION*** ** END CONFIDENTIAL INFORMATION *****

Spring 2014. Information surrounding the Commission’s rejection of Neustar’s best offer was hidden when two reports on the matter were filed under full confidentiality.³¹ Neustar decision makers thus have been unable to view even redacted portions of reports on a decision to reject a proposal that ***** BEGIN HIGHLY CONFIDENTIAL INFORMATION *** ** END HIGHLY CONFIDENTIAL INFORMATION *****.

Spring 2015. The Commission withheld two critical documents for months leading up to the *Selection Order* before filing them confidentially mere weeks before the sunshine

²⁷ See E-mail from Timothy Decker, Co-Chair, NAPM, to Sanford Williams, Special Counsel, Commission (Apr. 17, 2013).

²⁸ See Neustar Comments at 69-72.

²⁹ See Letter from Timothy Decker, Co-Chair, NAPM, to Steve Edwards, Senior Vice President, Neustar (Jan. 24, 2014).

³⁰ *Selection Order* ¶ 45.

³¹ See Report of the North American Portability Management LLC in Response to the Wireline Competition Bureau Letter, dated February 11, 2014, WC Docket No. 09-109 & CC Docket No. 95-116 (Mar. 20, 2014) (“NAPM Process Report”) (submitted confidentially); LNPA Selection Working Group (SWG) Selection Process Report, WC Docket No. 09-109 & CC Docket No. 95-116 (Apr. 14, 2014) (submitted confidentially).

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period.³² One was a transcript of a NANC meeting regarding the decision not to solicit additional bids.³³ The transcript, which was almost entirely not competitively sensitive, showed *** **BEGIN HIGHLY CONFIDENTIAL INFORMATION** *** **END HIGHLY CONFIDENTIAL INFORMATION** ***. Neustar had sought access to the transcript but was led to believe it did not exist.³⁴ The other report contained recommendations regarding national security requirements.³⁵ Neustar counsel with security clearances repeatedly asked the Commission for permission to view the report, but they were refused each time.³⁶ The report apparently was critical to the selection of Ericsson.³⁷

In addition, on the eve of the *Selection Order*, the Commission negotiated with Ericsson significant modifications to the code of conduct and voting trust without opportunity for comment or evaluation by interested parties.³⁸ Although Ericsson filed an *ex parte* letter at 7:00 p.m. the night before the Commission voted on the *Selection Order*,³⁹ that filing gave interested parties no opportunity to respond. The late filed *ex parte* violated section

³² See Letter from Thomas J. Navin and Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116, at 4 (filed May 2, 2016); Letter from Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket No. 09-109 (filed Mar. 11, 2015).

³³ See Letter from Sanford S. Williams, Wireline Competition Bureau, FCC, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116 & WC Docket No. 09-109 (filed Mar. 3, 2015) (submitting confidentially the transcript of the March 26, 2014 NANC meeting).

³⁴ See Letter from Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116; WC Docket No. 09-109, at 2, Attachment A (filed Mar. 11, 2015).

³⁵ See Letter from Sanford S. Williams, Wireline Competition Bureau, FCC, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116 & WC Docket No. 09-109 (filed Mar. 3, 2015) (letter regarding the confidential submission of the security report).

³⁶ See Letter from Stewart Baker, Michael Sussmann, and Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116; WC Docket No. 09-109, at 2 (filed Mar. 17, 2015).

³⁷ See Letter from Sanford S. Williams, Wireline Competition Bureau, FCC, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116 & WC Docket No. 09-109 (filed Mar. 3, 2015) (stating that “there are important implications to the Nation’s security as a result of this program, and addressing those items is a concern to those of us on the national security team”).

³⁸ See Letter from Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116; WC Docket No. 09-109, at 1 (filed Mar. 26, 2015).

³⁹ See Letter from John T. Nakahata, Counsel, Telcordia, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket Nos. 07-149 & 09-109 (filed Mar. 25, 2015).

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1.1206(b) of the Commission’s rules, which provides that all parties have an opportunity to respond *before* the Commission acts.

Summer 2015. The Bureau modified the *ex parte* rules applicable to this proceeding so that parties were no longer required to disclose communications concerning “contract negotiations between NAPM and Telcordia” and “issues around the transition of the LNPA.”⁴⁰ The modification of the *ex parte* rules was used to hide facts surrounding Ericsson’s violation of the *Selection Order*’s national security requirements.⁴¹ The Bureau effectively concealed facts at a critical stage of an ongoing adversarial proceeding from public scrutiny and Ericsson’s sole competitor.

Summer 2016. The Commission attempted to hastily approve Ericsson’s MSA without appropriate public comment, all while withholding from the public evidence that Ericsson failed to comply with national security commitments upon which the Commission relied in the *Selection Order*.⁴²

* * *

Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Thomas J. Navin

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⁴⁰ See Notice Concerning Ex Parte Status of Communications with Respect to the Local Number Portability Administrator Selection Proceeding, Public Notice, 30 FCC Rcd 8425 (Wireline Comp. Bur. 2015).

⁴¹ See Letter from John T. Nakahata, Counsel, Telcordia, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket Nos. 07-149 & 09-109, at 2 (filed May 4, 2016).

⁴² See Letter from Thomas J. Navin and Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116 (filed May 9, 2016); Letter from Thomas J. Navin and Aaron M. Panner, Counsel, Neustar, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116 (filed May 2, 2016).

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