

November 30, 2018

Notice of Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C, 20554

Re: Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Dkt. 17-59

Dear Ms. Dortch:

This is to inform you that on November 29, 2018, Natalie McNamer and myself, representing iconectiv, spoke by telephone with the following Commission staff in connection with the above-referenced proceeding: Josh Zeldis of the Consumer and Governmental Affairs Bureau; and Bill Andrle and Myrva Charles of the Wireline Competition Bureau.

During this meeting, we discussed the differences between the proposed database for reassigned numbers and the functions of the NANPA and Pooling Administration databases. We identified a number of key operational and design differences including: nature and size of the end-user class; billing & collection requirements; administrative versus query type access; type and scope of information to be maintained; and connectivity requirements. iconectiv noted that while the draft order indicates that the Commission intends to select an administrator for the reassigned numbers database through a competitive bidding process, constraining the options for how a vendor would be selected is likely to unnecessarily limit competition for offering the service with potentially negative impacts on the ultimate quality and cost. In light of the absence of a record on these complex issues, iconectiv recommended that the Commission instead refer them to the NANC and that the order clarify that the NANC will have latitude to recommend an approach best suited to a successful competitive procurement.

If you have any questions concerning this notice, please contact me at 202-579-4205.

Sincerely,

Glenn T. Reynolds
Head of Government and Industry Affairs
iconectiv

cc: Josh Zeldis
Bill Andrle
Myrva Charles