



December 19, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-4325
Washington, D.C. 20554

RE: *Numbering Resource Optimization*, CC Docket No. 99-200; *Telephone Number Portability*, CC Docket No. 95-116; *North American Numbering Plan Administration*, CC Docket No. 92-237; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, WC Docket No. 03-123; *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196

Dear Ms. Dortch:

In conjunction with Neustar's request for changes to the neutrality requirements applicable to it if it continues as the Internet-based Telecommunications Relay Service Telephone Directory Administrator ("iTRS Administrator") and in consideration of the extension of the iTRS Administrator contract, Neustar commits that, for so long as Neustar serves as the iTRS Administrator, no Neustar employee directly involved in core iTRS administration duties¹ will be a shared employee with Hux Investments, Pte. Ltd. ("Hux"), or Koch Redwood Investments, LLC or Koch Industries, Inc. (together, the "Koch Investor"), detailed from Hux or the Koch Investor, receive any compensation from Hux or the Koch Investor, or communicate directly or indirectly with Hux or the Koch Investor regarding Neustar's core iTRS administration duties.

You may include this commitment in any contract for the iTRS Administrator.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kevin A. Hughes".

Kevin Hughes
Senior Vice President and
General Counsel

¹ As defined in *In the Matter of Implementation of Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration; 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; Telephone Number Portability*, WC Docket Nos. 09-109, 07-149, CC Docket 95-116, Order, 30 FCC Rcd 3082, ¶ 177.