

October 2, 2014

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TWA325  
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentations**

**CC Docket No. 95-116, WC Docket No. 09-109**

Dear Ms. Dortch:

On Tuesday, September 30, 2014, Leonard Kennedy, General Counsel; Steve Edwards, Senior Vice President; Scott Deutchman, Deputy General Counsel; and Aaron Goldberger, Associate General Counsel, all of Neustar, Inc. ("Neustar") and counsel Thomas Navin of Wiley Rein LLP; Aaron Panner of Kellogg, Huber, Hanson, Todd, Evans & Figel PLLC; and I met with Wireless Telecommunications Bureau ("WTB") representatives Roger Sherman, Bureau Chief; Jim Schlichting, Senior Deputy Bureau Chief; Michael Janson, Legal Advisor; Joel Taubenblatt, Acting Division Chief, Spectrum and Competition Policy Division; and Pramesh Jobanputra, Spectrum and Competition Policy Division; as well as Ann Stevens, Deputy Division Chief, Competition Policy Division, Wireline Competition Bureau. The Neustar representatives also met with Consumer and Governmental Affairs Bureau ("CGB") representatives Kris Monteith, Acting Bureau Chief; Mark Stone, Deputy Bureau Chief; Aaron Garza, Legal Advisor; and Kurt Schroeder, Chief, Consumer Policy Division and Information Access and Privacy Office; as well as Ann Stevens.

In both meetings, Neustar highlighted the critical ways that number portability promotes wireless competition and benefits consumers. Neustar explained that the pending LNPA selection process has focused primarily on the North American Numbering Council ("NANC") recommendation and applicant bids, with little focus on important public policy issues such as the potential impact on telecommunications competition or consumers, particularly if there is an LNPA transition. Neustar also added that the Commission is legally required to select any new LNPA through a rulemaking proceeding. Moreover, conducting a rulemaking proceeding will ensure that important public policy issues raised by the selection and a possible transition can be aired and reviewed through a more transparent process. Such a proceeding will also better enable voices other than those of the largest carriers to weigh in on the LNPA selection and to assess the risks of any transition.

In addition, Neustar noted that most number porting today is wireless-to-wireless and wireline-to-wireless, reflecting the dynamic nature of today's wireless industry. Approximately one in twenty wireless and wireline numbers are ported every year. Neustar also highlighted the important role that number portability plays in protecting consumers by reducing the transaction costs for consumers who seek to change providers. Given consumers' strong personal identification with their phone numbers, Neustar advised that even the perception that a post-transition NPAC would

no longer perform flawlessly and impartially would endanger public confidence in number portability, potentially increasing consumers' "lock in" to their current provider. Neustar also explained that the Number Portability Administration Center ("NPAC") supports many more services than just local number porting, facilitating important consumer services such as iTRS and do-not-call registries, as well as critical law enforcement and public safety services such as the Local Number Portability Enhanced Analytical Platform ("LEAP") and 9-1-1.

In conclusion, Neustar advised that, as the Commission undertakes an LNPA selection for the first time in many years, it should keep in mind the significance of this decision to the many parties who rely on – and pay for – the NPAC system, but have not had sufficient opportunity to play a role or have a voice in the selection process. The wireless industry – particularly smaller carriers – and wireless consumers have a huge stake in the NPAC system, and Neustar urged WTB and CGB to ensure that consumers and competitive carriers have a means to participate in the LNPA selection process and are protected if there is a transition.

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this notice electronically in the above-referenced dockets. Please contact me directly with any questions.

Respectfully submitted,

*/s/ Michele Farquhar*

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