



*City of Fairfax
Office of Emergency
Management
10455 Armstrong Street
Fairfax, Virginia 22030*



November 4, 2014

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Dear Chairman Wheeler,

As you know, a vendor for Local Number Portability Administrator (LNPA) services is currently being selected under your oversight. As the Emergency Coordinator of the City of Fairfax, Virginia, I am writing to express my deep concern at the possible interruption, degradation, or cancellation of essential public safety services associated with this decision. There are three vital services that need to remain protected without interruption.

- 1) The current LNPA provides a service whereby 9-1-1 databases are updated regularly against LNPA data, to flag any users who have recently ported their service. This allows 9-1-1 providers to ensure that their own data remains up-to-date. Without this service, if someone who had recently changed phone carriers, or their method of service (landline, VoIP, wireless) called 9-1-1, and for whatever reason they were not able to provide their callback number, location, or other key information to the operator, 9-1-1 could be severely challenged in locating them. And with a 9-1-1 call, delays have dire consequences.
- 2) Additionally, the LNPA oversees a disaster number porting program that allows damaged or destroyed communications switches to be bypassed in order to maintain communications for people both inside of and outside of the affected area. Thousands of consumers were the unknowing beneficiaries of this service during Hurricane Katrina.
- 3) Finally, the LNPA operates a service that allows law enforcement at all levels to follow phone numbers of criminals and possible terrorists as they port their number to remain at-large. Fairfax sits squarely in the National Capital Region which has unique security concerns due to the sensitive government operations located throughout the region. The ability for law enforcement, both ours and others, to track and bring criminals to justice is paramount.



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I do not write to promote any particular LNPA vendor over another. I write to maintain the vital public safety services that currently exist. I would urge that any new vendor chosen would need to prove their capabilities on these three programs and their ability to have them in place and working before the current contract ends.

Thank you for your time and consideration.

A handwritten signature in black ink that reads 'K Rudnicki'.

Ken Rudnicki, CEM
Emergency Coordinator

cc: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Reilly
Rear Admiral (ret.) David Simpson