

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)	
)	WC Docket No. 09-109
Seeks Comments on Petition of Telcordia)	
Petition 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)	

COMMENTS OF PROFESSIONAL ASSOCIATION FOR CUSTOMER ENGAGEMENT

Filed November 10, 2014

Tom Rocca
Professional Association for Customer
Engagement
8500 Keystone Crossing, Suite 480
Indianapolis, IN 46240

*Chief Operating Officer of Professional
Association for Customer Engagement*

Michele A. Shuster, Esq.
Nicholas R. Whisler, Esq.
Mac Murray, Petersen & Shuster LLP
6530 West Campus Oval, Suite 210
New Albany, OH 43054

*Counsel for Professional Association
for Customer Engagement*

TABLE OF CONTENTS

I.	INTRODUCTION AND SUMMARY	1
II.	CONNECTION BETWEEN PACE AND LOCAL NUMBER PORTABILITY	2
III.	NEW NPAC ADMINISTRATOR.....	2

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)	
)	WC Docket No. 09-109
Seeks Comments on Petition of Telcordia)	
Petition 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)	

**COMMENTS OF THE PROFESSIONAL ASSOCIATION FOR CUSTOMER
ENGAGEMENT**

The Professional Association for Customer Engagement (PACE) organization respectfully submits the following comments in connection with the Public Notice released on June 9, 2014 by the Federal Communications Commission (“FCC” or “Commission”) regarding the recommendation to select Telcordia Technologies, Inc. (Telcordia) as the next Local Portability Administrator.

I. INTRODUCTION AND SUMMARY

The PACE organization is a non-profit organization dedicated to the advancement of companies that use a multi-channel approach to engage their customers, both business to business and business to consumer. These channels include contact centers, email, chat, social media, web and text. Our membership is made up of Fortune 500 companies, contact centers, economic development organizations and technology suppliers that enable companies to contact

or enhance contact with their customers through more than 500,000 employees.¹ From our National Convention and Washington Leadership Summit, Compliance Master Series seminars, to our 12 Regional Chapters that hold events around the country, PACE provides key resources and information to its membership base. A key function for PACE is to provide members with the latest industry information, regulatory news, and consumer best practices. We offer certifications, webinars, and compliance education to our members.

II. CONNECTION BETWEEN PACE AND LOCAL NUMBER PORTABILITY

PACE promotes and educates its members on regulatory compliance. One key area for our members is to understand and comply with TCPA regulations. For PACE members, this involves knowing if a telephone number is a wireline or wireless number and taking this into account in any customer contact or interaction. In order to assist with TCPA compliance Neustar, as the NPAC administrator, provides a service to the industry to identify telephone numbers which have ported from a wireline service provider to a wireless service provider. During the past 10 years, this service has been a valuable resource for our members in providing a reliable and simple way to take into account if telephone numbers have changed service providers and if the new service provider is designated as a wireless provider given information contained in the NPAC. Without this important service PACE members could run afoul of the TCPA causing issues for both those they are seeking to call as well as for themselves via regulatory fines. Neustar's service is reliable, authoritative, and an essential aspect of complying with TCPA regulations.

¹ IBISWORLD, TELEMARKETING & CALL CENTERS IN THE U.S. (Oct. 2014 ed.), *available at* <http://www.ibisworld.com/industry/default.aspx?indid=1468>.

III. NEW NPAC ADMINISTRATOR

It was only recently that PACE became aware of the potential change in the administration of local number portability. While PACE takes no position on the selection of the new NPAC administrator and remains neutral as to which vendor is ultimately selected, it is concerned with the continued availability and cost of the service critical to its members and provided by the current administrator. To date, neither PACE nor its members have been consulted about their use of and the importance of this current service. PACE is concerned that the selection of the new NPAC vendor may negatively affect, or simply cause changes to the service on which they depend. Any transition problems that create issues with the accuracy of the list, changes to how this service is offered, or its cost to PACE members would need to be worked out prior to the transition taking place. PACE and its members cannot risk the lawsuits, penalties and fines associated with marketing to telephone numbers that are potentially wireless. PACE, on behalf of its membership respectfully requests that the FCC consider how a transition to a new NPAC vendor might impact this critical service that is today provided by Neustar.

Respectfully submitted,

/s/ Michele A. Shuster

Michele A. Shuster, Esq.

Nicholas R. Whisler, Esq.

Mac Murray, Petersen & Shuster LLP

6530 West Campus Oval, Suite 210

New Albany, OH 43054

Telephone: (614) 939-9955

Facsimile: (614) 939-9954

*Counsel for Professional Association
for Customer Engagement*