



ORLEANS PARISH COMMUNICATION DISTRICT

Provider of New Orleans' 9-1-1 System

November 24, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554
November 24, 2014

Re: 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; Telephone Number Portability; WC Docket No. 09-109, CC Docket No. 95-116

Dear Ms. Dortch:

On behalf of the Orleans Parish Communications District ("OPCD"), a political sub-division of the State of Louisiana responsible for 9-1-1 service in the City of New Orleans, we are writing regarding the ongoing proceeding concerning the recommendation of the North American Numbering Council ("NANC") that the Federal Communications Commission ("FCC") select Telcordia Technologies, Inc. ("Telcordia") to serve as the next local number portability administrator ("LNPA").

The OPCD does not take a position on the NANC recommendation of Telcordia as the next LNPA; the OPCD feels strongly that the selection of the next LNPA must not negatively impact 9-1-1 reliability.

The OPCD believes, a provider of 9-1-1 products and services, that the FCC must ensure that tools and applications for the timely and economical management of 9-1-1 data currently in use must remain available to 9-1-1 providers at no cost, and that any transition to a new LNPA must not be allowed to adversely affect 9-1-1 data management. To the extent that candidates for LNPA have not been asked to demonstrate their ability to maintain the number portability services currently relied on by 9-1-1 providers, the FCC should consider amending the Request for Proposals to require confirmation that these critical services will continue to be available.

The importance of the LNPA to public safety and law enforcement in the United States is critical. The OPCD requests that the Commission

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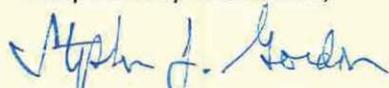
Stephen J. Gordon
Executive Director

consider the ability of the LNPA vendor to satisfy “the important law enforcement, public safety, and national security equities of the local, state and federal law enforcement agencies that rely on the important and highly sensitive services the LNPA provides.” It is important to emphasize the important role that the LNPA plays in the day-to-day work of law enforcement agencies, and to highlight the harm that could arise if these functions were disrupted through a failure on the part of the LNPA.

In addition to weighing the impact on 9-1-1 services resulting from a transition of the LNPA, NENA believes the FCC should consider the ability of a new LNPA to seamlessly enable the IP transition, including the transition to Next Generation 9-1-1 services. It is vital that the stability of the numbering platform is not threatened during the IP transition, while adding that the FCC should strongly consider requiring candidates for LNPA to explain in detail their proposals for negotiating this critical and technologically complicated transition.

The 9-1-1 services, including Next Generation 9-1-1, are part of the backbone of the public safety infrastructure in the U.S., and the FCC must ensure that any vendor selected to serve as LNPA can deliver high levels of accuracy and reliability. The Orleans Parish Communication District asks the FCC to take into account the various law enforcement, public safety and homeland security concerns implicated by local number portability in making its selection of the next LNPA.

Respectfully submitted,



Stephen J. Gordon, Director
Orleans Parish Communication District