



Kathleen Q. Abernathy  
Executive Vice President, External Affairs

November 26, 2014

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: *Petition of Neustar, Inc. for a Declaratory Ruling Concerning the Local Number Portability Administration Request for Proposal; Telephone Local Number Portability, CC Docket No. 95-116; Petition of Telcordia Technologies, WC Docket No. 09-109*

Dear Ms. Dortch:

On behalf of Frontier Communications, I write today to urge the Commission to take into careful consideration various factors as part of the final selection of the Local Number Portability Administrator (LNPA).

The NPAC is an essential part of the telecommunications infrastructure, supporting choice and competition, reliability and safety, and basic delivery of voice service. The existing infrastructure and NPAC are critical elements to facilitating customer acquisition, ensuring equal access to phone numbers, supporting network evolution and business requirements and enabling Frontier and other smaller providers to effectively compete with the larger providers.

The NPAC should retain the same level of functionality and service currently offered, and this must be provided without the need for investment in an entirely new infrastructure. The system must support disaster recovery and emergency preparedness, ecosystem monitoring and management, and mass porting capabilities. These functions must be a part of any LNPA selection process at this time; retrofitting the system to include such functions at a later date would be unacceptable.

We agree that cost-per-port is a significant component to consider when evaluating offers of service, but the port cost alone should not be the deciding factor when so much is at stake. Major changes to the NPAC functionality and infrastructure and a transition of the LNPA simply to maintain the status quo – a seamless porting process – will be costly for all, and disproportionately more costly for smaller carriers. In addition, the disruption caused by a potentially poor transition and faulty LNP process will not only require additional funds, but runs the risk of causing significant damage to the system that enables a competitive market for voice services. We urge you to take into account fully and protect against any disruption of service that could result from a failed transition.

We respectfully request the Commission take measures to ensure that RFP and final selection of LNPA reflect the needs and concerns of all key stakeholders and users of the system.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen Q. Abernathy".

Kathleen Q. Abernathy