

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

In the Matter of:

Petition of Telcordia Technologies, Inc. To Reform or Strike Amendment 70, To Institute a Competitive Bidding for Number Portability Administration, and To End the LLC's Interim Role in Number Portability Administration Contract Management

WC Docket No. 09-109

WC Docket No. 07-149

Telephone Number Portability

CC Docket No. 95-116

REPLY COMMENTS OF TELCORDIA TECHNOLOGIES, INC., D/B/A ICONECTIV

Telcordia Technologies, Inc., d/b/a iconectiv ("Telcordia") hereby files these Reply Comments in response to Neustar's February 12 and October 22 Petitions for Declaratory Ruling.¹ Telcordia's Oppositions to Neustar's petitions, its November 21 Comments and its prior filings cited therein provide all the response that is necessary to Neustar's arguments.² Neither Neustar nor any other commenter raises any new issues that should impede the Commission from completing the LNPA selection process.

¹ Petition of Neustar for Declaratory Ruling Concerning the Local Number Portability Administration Selection Process, WC Docket No. 09-109, CC Docket No. 95-116 (filed Feb. 12, 2014); Neustar Petition for Declaratory Ruling, WC Docket No. 09-109, CC Docket No. 95-116 (filed Oct. 22, 2014).

² Opposition of Telcordia Technologies, Inc., d/b/a iconectiv, WC Docket Nos. 09-109 & 07-149, CC Docket No. 95-116 (filed Feb. 24, 2014); Opposition of Telcordia Technologies, Inc., d/b/a iconectiv to Neustar's Petition for Declaratory Ruling, WC Docket Nos. 09-109 & 07-149, CC Docket No. 95-116 (filed Nov. 3, 2014) ("Telcordia Nov. 3 Opposition"); Comments of Telcordia Technologies, Inc. d/b/a iconectiv, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116 (filed Nov. 21, 2014) ("Telcordia Nov. 21, 2014 Comments").

Indeed, as the comments of USTelecom and the North American Portability Management LLC (“NAPM”),³ along with the ex partes filed by USTelecom, CTIA, and a diverse group of wireline and wireless carriers,⁴ make clear, the industry is ready for the Commission immediately to finalize the LNPA selection. Not only do Neustar’s comments raise nothing new, but they also continue to fail to explain why Neustar did not raise the various “flaws” that it now finds in the selection process and the RFP during the public comment periods that the Commission held before finalizing both the process and the RFP. Instead, Neustar simply repeats points it made in its February petition.⁵ Telcordia has thoroughly responded to these points. Neustar endorsed the selection process, endorsed the competence of the NAPM and its members to make an informed and knowledgeable recommendation, and urged the Commission to accept the procurement documents as drafted by the NAPM and NANC. Neustar sat on its hands because it thought it had the inside track, and now cannot be permitted to challenge the selection process and procurement documents that were finalized after public comment.

Moreover, it is particularly ironic that Neustar continues to allege that the LNPA selection process was “skewed” against it when,⁶ as Telcordia noted in its August 22 Reply Comments, the record strongly suggests that Neustar received and used material, non-public

³ See Comments of the United States Telecom Association at 5, CC Docket No. 95-116 & WC Docket No. 09-109 (filed Nov. 21, 2014) (“The process needs to move forward. The time is now for this proceeding to end.”); Opposition of the NAPM LLC at 1, CC Docket No. 95-116 & WC Docket No. 09-109 (filed Nov. 21, 2014) (“NAPM Comments”) (“[Neustar’s] Petition lacks merit, and further delay in this proceeding is harmful to the public interest.”).

⁴ Telcordia Nov. 21, 2014 Comments at 3 n.9 (citing Letter from Peter Karanjia, Counsel for CTIA-The Wireless Association, to Marlene H. Dortch, Secretary, FCC at 2, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116, (filed Nov. 20, 2014)).

⁵ Comments of Neustar, Inc. at 1-4, CC Docket No. 95-116 & WC Docket No. 09-109 (filed Nov. 21, 2014).

⁶ See, e.g., *id* at 4.

information about its standing in the bidding process when submitting its unsolicited offer just five weeks after its BAFO.⁷ Neustar has never put forth a credible explanation for why it chose to make its unsolicited offer five weeks after the BAFO, instead of making it in the BAFO itself.⁸ If there were to be additional rounds of bidding, as Neustar requests, Neustar should be disqualified on this basis, as there would be no other way to safeguard the integrity of the bidding process and prevent misuse of any material non-public information Neustar apparently received.⁹ But the Commission need not take that step because, as the wide consensus among diverse industry segments shows, it is time to conclude the selection process and move on to implementation. Indeed, none of the other commenters, including LNP Alliance, suggests that Neustar should be selected as LNPA.

Notably, only the LNP Alliance embraces Neustar's stall tactics, but to do so, it relies on incorrect facts regarding the Selection Working Group ("SWG"). Contrary to the LNP Alliance's assertion, of the SWG members participating in the development and discussion of the report, only three of ten were wireless network operators. Two were state public utility commissioners, and thus represent the broader public interest, including consumers, and are not

⁷ See Reply Comments of Telcordia Technologies, Inc., d/b/a iconectiv at 83-84, WC Docket No. 09-109, CC Docket No. 95-116 (filed Aug. 22, 2014) (errata filed Sept. 3, 2014) (errata at 85); Report of the North American Portability Management LLC in Response to the Wireline Competition Bureau Letter, dated Feb. 11, 2014 (filed Mar. 20, 2014) (attached to Letter from Betty Ann Kane, Chairman, North American Numbering Council, to Julie A. Veach, Chief, Wireline Competition Bureau, FCC, WC Docket No. 09-109, CC Docket No. 95-116 (dated Apr. 24, 2014 and filed Apr. 25, 2014).

⁸ One press article reported that Neustar had obtained "apparently detailed knowledge of Telcordia's bid" on which it based its post-BAFO unsolicited bid. See Capitol Forum, *LNPA Contract: NANC to Discuss Procurement at Quarterly Meeting; FCC Confident in its Contract Decision in Anticipation of Legal Challenge by Neustar* (Mar. 26, 2014).

⁹ See Ex Parte Response of Telcordia Technologies, Inc., d/b/a iconectiv to Neustar Reply Comments, WC Docket Nos. 09-109 & 07-149, CC Docket No. 95-116 (filed Sept. 24, 2014).

affiliated with any telecommunications providers. The others were two cable companies (Comcast and Cox), a wireline incumbent LEC (CenturyLink), a wireline CLEC (XO), and USTelecom, a trade association representing large and small wireline incumbent LECs. The SWG's co-chairs included a state public utility commissioner and a representative of the wireline CLEC XO, in addition to a representative from wireline and wireless carrier Verizon. Thus both the group's membership and its leadership were balanced, and it is simply wrong to suggest that small carriers' interests (or any group's interests) were not represented. Moreover, SWG participation was open to CompTel, a NANC member, one of the small provider entities that the LNP Alliance says should have been included.¹⁰ The LNP Alliance's paean to the 1997 selection process also conspicuously overlooks the fact that the 1997 SWG Report was significantly less detailed than the present report.¹¹ Thus, the LNP Alliance offers the Commission no reason not to deny Neustar's petitions and move on.

It is time to end Neustar's constant delays. The comments have not raised any additional arguments that would warrant any other result, and the industry agrees that consumers are

¹⁰ Comments of the LNP Alliance on Neustar's Petition for Declaratory Ruling at 4, WC Docket Nos. 09-109 & 07-149, CC Docket No. 95-116 (filed Nov. 21, 2014). XO is also an active CompTel member.

¹¹ See NAPM Comments at 4-5; Telcordia Nov. 3 Opposition at 6 n.14 (explaining that the 2013 report was more detailed than the 1997 report).

entitled to a final LNPA selection so the industry can begin to effect a smooth and cost-effective transition. The Commission should deny Neustar's petitions and bring the LNPA selection to a close.

Respectfully submitted,



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