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December 9, 2014

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

*Electronically Filed*

Re: CC Docket No. 95-116; WC Docket No. 09-109

Dear Ms. Dortch:

I write on behalf of Neustar, Inc., in response to the letter to you of December 8, 2014, from Peter Karanjia on behalf of CTIA.

I note at the outset the concern that Ericsson's President and CEO, Angel Ruiz, is currently the Secretary of the Board of Directors of CTIA; CTIA has given no indication that Mr. Ruiz has been recused from participation in matters related to the 2015 LNPA RFP. CTIA's advocacy reflects the point of view of the largest wireless carriers, who have strategic or commercial reasons for seeking to secure a Commission decision in favor of Ericsson, notwithstanding the threat of economic harm to the vast majority of service providers and the risk of significant disruption to the telecommunications infrastructure. To the extent that Ericsson has participated in the position taken by CTIA, its advocacy must be further discounted. Indeed, CTIA's intemperate claims help to demonstrate why the prospect of an LNPA that is aligned with the largest national wireless carriers (through common direction of CTIA for example) is something that the Commission cannot accept.

With respect to the price issues that CTIA's letter addresses, we must be clear: the claim that a decision to designate Ericsson as the next LNPA will save consumers \$40 million per month is false and misleading. Indeed, CTIA's overheated rhetoric is apparently designed to perpetuate the deception: the amount that would be charged under the current contract if that contract is simply extended is a matter of public record, but the cost of the various alternatives before the Commission is not. CTIA's claim that extending the contract would cost consumers \$40 million is based on two counter-factual assumptions: first, that Ericsson will provide LNPA services for free, which it clearly will not, and, second, that service providers will pass any

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savings on to consumers, something to which no service provider has committed and which cannot be assumed. Moreover, contrary to CTIA's claim that the cost of selecting Ericsson would be lower, Neustar has demonstrated that the expected costs of transition – \$60 million per month in the first year – dwarf even the full monthly cost of extending the current Neustar contract, let alone the difference between Neustar's proposal and Ericsson's proposal.

Selection of Ericsson would benefit Ericsson and would please a few of the other members of CTIA. But it will not save money for consumers; on the contrary, it will cost consumers money. It will not save money for the vast majority of industry participants; to the contrary, it will cost the vast majority of industry participants money. The prices contained in CTIA's letter are not news, and have nothing to do with the potential cost of the NPAC once the next LNPA contract is in place (no matter who is designated LNPA).

Moreover, CTIA's singular focus on misleading claims about Neustar's price betrays its utter inability to meet the substance of Neustar's showing that the recommendation before the Commission is facially inadequate and the product of an unlawful process. That recommendation fails to address the many substantive issues that must be resolved before the Commission can rationally approve the recommendation to abandon a system that operates flawlessly and that has delivered billions of dollars in consumer welfare benefits. Neustar does not claim and has never claimed that transition is impossible, but it does maintain that the record shows that any such transition is not remotely worth the cost. CTIA's letter reflects the judgment of the members who control its advocacy that transition is worth the cost *to them*. But it is the Commission's responsibility to evaluate the impact of this decision on the public interest. Letters like CTIA's simply underscore how little the NANC recommendation helps the Commission in carrying out that responsibility.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Sincerely,



Aaron M. Panner

cc: Daniel Alvarez  
Nicholas Degani  
Rebekah Goodheart  
David Goldman  
Amy Bender  
Julie Veach  
Jonathan Sallet  
Lisa Gelb

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