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Ms. Marlene H. Dortch, Secretary

December 12, 2014

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

Re: Petition of Telecordia Technologies Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administrator 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

I write today to express my concerns about the potential transition to a new Local Number Portability Administrator (LNPA). A LNPA, as you know, is currently being procured for mid-2015.

As an Emergency Management Coordinator, I have seen how crucial a capability communication can be during disaster response and recovery. As you know, following both the attacks of 9/11 and Hurricane Katrina, the current LNPA facilitated the porting of thousands of numbers, which would otherwise have been inoperable due to destroyed or flooded switches. If this action had not taken place, business interruption could have been even worse after 9/11, and survivors of Katrina would have had even greater difficulty communicating.

In addition to this crucial issue, two other capabilities are at risk in the current LNPA procurement. The current LNPA provides a service to law enforcement whereby the phones of suspects who port their numbers can still be tracked. The RFP for the next LNPA states that this service is to be provided at the discretion of the LNPA, and that it must pay for itself. As you know, the FBI, DEA, ICE, US Secret Service, NYPD, and many other leaders in US law enforcement have already written to express concern on this issue.

The current vendor also provides a service whereby 9-1-1 databases are updated regularly against LNPA data, to flag any users who have recently ported their service. This allows 9-1-1 providers to ensure that their own data remains up-to-date. This is essential for effective response – especially in the case of a “silent caller.” I join my colleagues at the Oklahoma Corporation Commission, NENA, Intrado, TCS, in arguing for the importance of this service.

I take no position on what vendor is selected to be the LNPA. However, I strongly encourage the FCC to ensure that any winning vendor demonstrate each of the following: capability to manage post-disaster porting of wireline, VoIP, and cell numbers; commitment to LEAP; and capability and commitment to continuing ALL database validation.

Any vendor awarded the LNPA contract should commit to the same level of service as the current provider on these public safety functions, and they should commit to such in their proposal.

Sincerely,

Patrick W. Conahey, Sr., RN. Coordinator,

Fairfield Township Office of Emergency Management