

KELLOGG, HUBER, HANSEN, TODD, EVANS & FIGEL, P.L.L.C.

SUMNER SQUARE  
1615 M STREET, N.W.  
SUITE 400  
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:  
(202) 326-7999

January 20, 2014

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

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

Dear Ms. Dortch:

On Thursday, January 15, 2015, on behalf of Neustar, Inc., Blair Levin met with FCC Chief of Staff Ruth Milkman and the Chairman's Wireline Legal Adviser Daniel Alvarez to discuss ways to identify and address the significant technical challenges and risks raised by a potential selection or transition of the Number Portability Administration Center ("NPAC") to a new Local Number Portability Administrator ("LNPA").

Mr. Levin stated that many others have highlighted the costs and delays inherent in any LNPA transition, and the impact that a flawed transition might have on the suite of services that affect every telephone user in the United States. He further noted that the NANC process failed to address or consider such costs and risks. Given that failure to address potential transition risk, Mr. Levin argued that it is critical for the Commission to ensure that such an analysis is undertaken and available to the Commission before it makes a final selection determination.

Mr. Levin also referenced the discussion held on January 8, 2015, between Neustar representatives and FCC officials about the technical difficulties that may arise, including with various transition scenarios.<sup>1</sup> Mr. Levin emphasized that the Commission would be best served if it rejected the NANC recommendation and declined to undertake an unnecessary and risky transition. He suggested, however, that if there were to be a transition, the Commission should first require an independent third party to evaluate the risks and costs, provide a road map, and to suggest a structure that would ensure accountability in any such selection or transition.

---

<sup>1</sup> See Letter from Michele Farquhar, Counsel to Neustar, to Marlene H. Dortch, FCC, CC Docket No. 95-116, WC Docket No. 07-149, WC Docket No. 09-109 (filed Jan. 12, 2015).

Ms. Dortch  
January 20, 2015  
Page 2

Mr. Levin emphasized the need to protect consumers, small carriers, and others, such as law enforcement and the public safety sector, from unanticipated failures or costs in such a transition, which would be difficult, if not impossible, to do without an adequate understanding of the risks and a transition road map to mitigate those risks.

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,

Handwritten signature of Aaron M. Panner in cursive, with the initials 'cmw' at the end.

Aaron M. Panner

cc: Ruth Milkman  
Daniel Alvarez