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January 28, 2015

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

**Re: Local Number Portability
 CC Docket No. 95-116; WC Docket No. 09-109**

Dear Ms. Dortch:

Neustar, Inc. (Neustar) respectfully submits the attached report prepared by Smith & Associates (S&A), an expert information technology (IT) consulting firm that undertook a thorough review of the proposals submitted by Neustar and Telcordia Technologies, Inc., an Ericsson Inc. subsidiary doing business as iconectiv (iconectiv), in response to the Federal Communications Commission’s (FCC) Request for Proposals for a Local Number Portability Administrator (LNPA). In performing its review, S&A examined the entire record and assessed the current status of the Number Portability Administration Center Service Management System (NPAC/SMS), Neustar’s performance as the incumbent LNPA, iconectiv’s proposed solution and its overall viability, and potential risks associated with transitioning to a new LNPA. The report demonstrates that those transition risks are high, especially in view of the fact that the system that will be implemented by iconectiv will not advance the state of the art and, in important respects, falls short of what Neustar currently provides.

Because iconectiv’s proposal refers **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

[REDACTED]

[END HIGHLY CONFIDENTIAL INFORMATION] After a thorough analysis, S&A determined that, even if iconectiv were to take this approach, it would have serious technical flaws and pose unmitigated risks, particularly as compared to Neustar’s superior solution.

S&A then analyzed the iconectiv proposal in light of the company’s statements that it does not intend **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

[REDACTED] **[END HIGHLY CONFIDENTIAL INFORMATION]** but rather intends to write new software “from scratch.” Based on iconectiv’s decision to develop all new software, S&A found that **[BEGIN HIGHLY**

CONFIDENTIAL INFORMATION] [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] **[END**

HIGHLY CONFIDENTIAL INFORMATION]

S&A further explains that iconectiv’s transition plan is severely lacking, noting major deficiencies and unmitigated risks, including a failure to allow for sufficient time to transition and a lack of a true risk profile. Specifically, S&A states **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** [REDACTED] **[END HIGHLY CONFIDENTIAL INFORMATION]** if the NPAC software in fact will be developed from scratch. It also explains that a number of the risks iconectiv noted in its proposal were not properly identified or mitigated in the Transition Plan, a significant shortcoming that demonstrates a lack of understanding of system development and deployment risks.

Additionally, S&A expressed doubts about the supposed equivalency of the proposals given the lack of detail supplied by iconectiv as to how it would accomplish significant software development tasks and, at the same time, manage a complicated transition on a compressed (and ultimately unrealistic) timeline, stating:

No NPAC functionality or operational performance could have been compared prior to the NANC recommendation because a new NPAC system from iconectiv was not available for evaluation, nor did the Transition Plan include any details that would normally be included to evaluate a new software development effort and the resulting potential solution.

...

Consequently, no matter whether iconectiv actually intends to use a “build” or “buy” approach, the NANC conclusion that the NPAC systems proposed were relatively equivalent based on the technical criteria, which carried **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** [REDACTED] **[END HIGHLY**

¹ When conducting its review, S&A did not evaluate the national security risks associated with iconectiv’s offer **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** [REDACTED] **[END HIGHLY CONFIDENTIAL INFORMATION]** Its focus when reviewing this solution as well as iconectiv’s “from scratch” approach was technical and transitional viability. Neustar maintains that the only way to appropriately address national security issues is to deploy a system based on code developed solely in the United States.

CONFIDENTIAL INFORMATION] of the evaluation weight, in our opinion is not valid.

Because of this and many other issues discussed at length in the report, S&A's ultimate conclusion is that

The Neustar NPAC/SMS system is built on state-of-the-art technologies, is in production today, and is well-positioned to grow into new technologies as they become commercially available and are needed to fulfill functional or performance requirements. The Neustar NPAC system is substantially more advanced in its support of the NANC requirements today, and will be more responsive and less disruptive to the short-term and longer-term needs and activities of the Service Providers and the public.

In summary, after thoroughly reviewing the entire record, S&A concluded that iconectiv's proposal lacks the necessary detail to support a determination of comparability and, more importantly, is seriously deficient in multiple respects, most significantly in proposing a wholly unrealistic plan and timetable for transition. These shortcomings in iconectiv's approach are sure to result in long implementation delays and major disruptions for service providers and their customers. Neustar respectfully submits that S&A's report fully supports the conclusion that a change in NPAC administrators is not a reasonable option.

Sincerely,

/s/ Thomas L. McGovern III

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