

Emergency Communications Department

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Joseph Barasoain
Director

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Marlene H. Dortch, Secretary
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

Ms. Dortch,

I write today to express my concerns about the potential transition to a new Local Number Portability Administrator (LNPA), which has public safety implications to my county and others.

As the Director of Emergency Services for Fulton County, we have over 500,000 calls and are responsible for almost 250 thousand residents. Being in the southeast, we are no strangers to disasters and 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. This action was unseen by the vast majority of Americans and yet the benefits were felt by millions who were able to reach loved ones and continue business matters.

In addition to this crucial issue, two other capabilities are at risk in the current LPNA procurement.

The current LPNA provides a service to law enforcement whereby the phones of suspects who port their numbers can still be tracked. The Request for Proposal 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 concerns 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” which we do have as a 911 system, especially in cases of domestic violence or calls from small children.

I take no position on what vendor is selected to be the LNPA. However, I strongly encourage the FCC to ensure that any awarded vendor demonstrate their capability to meet each of these three services before the handoff is made to give comfort to public safety professionals. In addition, I would ask that these services be written in and codified for future contracts so that this effort does not need to be repeated.

Thank you very much for your consideration.

Sincerely,



Joe Barasoain, Director
Public Safety Communications
Fulton County Emergency Services Department Fulton County, Georgia

cc: Patrick O'Connor, Interim County Manager, Fulton County, Georgia
Anna Roach, Deputy County Manager, Fulton County, Georgia
Matthew Kallmyer, Director, Atlanta-Fulton County Emergency Management Agency