

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Ensuring Customer Premises Equipment Backup Power for Continuity of Communications)	PS Docket No. 14-174
)	
Technology Transitions)	GN Docket No. 13-5
)	
Policies and Rules Governing Retirement Of Copper Loops by Incumbent Local Exchange Carriers)	RM-11358
)	
Special Access for Price Cap Local Exchange Carriers)	WC Docket No. 05-25
)	
AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services)	RM-10593
)	
Petition of Telcordia Technologies Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration and to End the NAPM LLC's Interim Role in Number Portability Administration Contract)	WC Docket No. 09-109
)	
Telephone Number Portability)	CC Docket No. 95-116
)	

COMMENTS OF NEUSTAR, INC.

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COMMENTS OF NEUSTAR, INC.

I. INTRODUCTION AND SUMMARY

Neustar, Inc. (“Neustar”) respectfully submits these comments in response to the Notice of Proposed Rulemaking (“*NPRM*”) released by the Federal Communications Commission

(“FCC”) in the above-captioned proceedings.¹ In the *NPRM*, the FCC seeks comment on the steps necessary to enable the transition from copper to IP-based networks while strengthening existing public safety, pro-consumer and pro-competition policies and protections.²

The FCC identifies competition, consumer protection, and public safety as the critical elements of its analysis of the IP transition, and has correctly determined that a rulemaking is the appropriate mechanism to assess this transition.³ The FCC must also examine in parallel the vital role that numbering administration issues, including local number portability, will play in enabling a successful IP transition. Without a fully developed plan for the transition of local number functionality and portability from TDM to an IP environment, critical numbering resources and capabilities could become obstacles to competition, consumer protection and public safety in an IP environment rather than enable them.

Likewise, notice-and-comment rulemaking—which is required for the FCC’s proceeding to select the next Local Number Portability Administrator (“LNPA”)—is the appropriate vehicle to consider fully and develop plans for mapping and successfully migrating numbering administration functions, including local number portability, to an all-IP environment. Accordingly, the FCC should initiate a rulemaking proceeding to guide the process for the LNPA selection as a part of its IP transition planning process.

Transparency is the best approach for achieving the promise of technology transitions, and a notice and comment rulemaking is the best means for creating that transparency.

¹ Ensuring Customer Premises Equipment Backup Power for Continuity of Communications; Technology Transitions; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers; Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, *Notice of Proposed Rulemaking and Declaratory Ruling*, 29 FCC Rcd 14968 (2014) (“*NPRM*”).

² *Id.* ¶ 2.

³ *Id.* ¶ 1.

Stakeholders should be permitted to provide feedback on which elements of their existing services—whether telephony or underlying number portability and functionality—must be maintained or alternatively be permitted to be modified or discontinued if a transition takes place. Undertaking a rulemaking that focuses on how scarce numbering resources will be allocated and administered during and after the IP transition will allow consumers, competitors, and the public safety community to provide critical insight into how to ensure that the telecommunications marketplace can continue to evolve without endangering consumer choice, threatening emergency access to communications services, or undermining competition.

II. TECHNOLOGY TRANSITIONS SHOULD PROTECT CONSUMER WELFARE, COMPETITION AND PUBLIC SAFETY

The FCC's oversight of the IP transition must ensure that public safety entities retain seamless and robust access to the full suite of critical telephony services; that consumers can rely on the continued uninterrupted high-level performance of the telephone network, including emergency access; and that no changes are made in the service offerings available to carriers that could harm or undermine competition. Accomplishing these goals requires coordinating the IP transition process with the selection of the next LNPA, because number portability enables the stability and reliability of the national telecommunications infrastructure.

In the *NPRM*, the FCC seeks comment on how to ensure the continuity and reliability of telecommunications services in the face of natural and manmade disasters,⁴ and specifically asks if providers should be required to affirm that the IP transition will not result in any reduction in 911 capability.⁵ Remarkably, the Commission failed to pose these same questions as part of the LNPA selection process, despite the key role that the LNPA plays in providing integral services

⁴ *Id.* ¶ 31.

⁵ *Id.* ¶ 100.

to support law enforcement, national security, and disaster recovery.⁶ In particular, the LNPA transition is closely tied to the deployment of IP-based Next Generation 911 services.⁷ The FCC expresses its commitment to ensuring that law enforcement capabilities are maintained throughout the IP transition;⁸ but for this to take place, the Commission must also ensure that any LNPA can satisfy the requirements of law enforcement for IP-based networks, including a seamless transition to supporting NG911.

The *NPRM* also seeks comment on how to achieve the FCC's goal of maintaining competition in the telecommunications marketplace in light of the IP transition, which could otherwise harm small carriers and consumers.⁹ Inviting public comment on the impact of the IP transition on competition constitutes greater transparency than that afforded by the LNPA selection process, which was entirely conducted by carriers with annual revenues of at least \$1.5 billion and only allowed competitive carriers the opportunity to comment after the LNPA vendor recommendation had been finalized.¹⁰ Competitive and regional providers are disproportionately affected by technology transitions, because they have more limited financial and technical

⁶ See, e.g., Petition of Neustar for Declaratory Ruling Concerning the Local Numbering Portability Administration Selection Process, WC Docket No. 09-109, CC Docket No. 95-116 at 13 (Feb. 12, 2014) (“*February Petition*”) (describing role of the Number Portability Administration Center (“NPAC”) and LNPA in restoring service after Hurricane Katrina and 9/11); Letter from Kenneth Mallette, Executive Director, Maryland Emergency Management Agency, to Tom Wheeler, Chairman, FCC, WC Docket No. 09-109, CC Docket No. 95-116 (Nov. 10, 2014) (describing the importance of the LNPA to the availability of 911 location information, mass porting, and LEAP); Letter from Stephen Gordon, Director, Orleans Parish Communication District, to Marlene Dortch, Secretary, FCC, WC Docket No. 09-109, CC Docket No. 95-116 at 2 (Nov. 24, 2014) (“It is vital that the stability of the numbering platform is not threatened during the IP transition;” the FCC should “strongly consider requiring candidates for LNPA to explain in detail their proposals for negotiating this critical and technologically complicated transition.”).

⁷ See Letter from Brian Fontes, CEO, NENA: The 9-1-1 Association, to Marlene Dortch, Secretary, FCC, WC Docket No. 09-109, CC Docket No. 95-116 at 2 (Aug. 22, 2014).

⁸ *NPRM* ¶ 94 n.191.

⁹ *Id.* ¶ 110.

¹⁰ Comments of the LNP Alliance on Neustar's Petition for Declaratory Ruling, WC Docket No. 09-109, CC Docket No. 95-116 at 3-6 (Nov. 21, 2014).

resources than larger carriers.¹¹ The Number Portability Administration Center's ("NPAC") services are relied on by over 2000 service providers, public safety organizations, and law enforcement agencies. Should the FCC determine to transition the NPAC to a new vendor, that transition could give rise to a \$1.136 billion increase in operating costs for carriers in the first year.¹² Inevitably, at least some cost increases will be passed onto consumers in the form of higher prices, and all told approximately 12 million consumers could be adversely affected by a LNPA transition.¹³ As discussed below, the best way for the FCC to avoid these adverse impacts on competitive carriers, consumers, and the public safety community is to conduct the LNPA selection process as part of a notice and comment rulemaking proceeding.

III. THE IP TRANSITION AND NUMBER ADMINISTRATION ARE CLOSELY LINKED

As other commenters have pointed out, the IP transition and number administration are tightly intertwined.¹⁴ The IP transition represents not only a change in technology, but also a revolutionary change in both the telecommunications services that consumers and businesses use today and in service providers' networks, which will require access to LNP services in order to continue reliably offering retail communications services to the public over IP-based networks.¹⁵ LNP services enable the stability, reliability and competitiveness of today's U.S. TDM-based

¹¹ See *February Petition* at 14; Letter from COMPTTEL et al. at 2, *attached to* Letter from Angie Kronenberg, COMPTTEL, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket Nos. 07-149, 09-109 (Feb. 7, 2014).

¹² See Hal Singer, Addendum to "Estimating the Costs Associated with a Change in Local Number Portability Administration" at 2, *attached to* Letter from Aaron Panner, Counsel, Neustar, Inc. to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket No. 09-109 at 1-2 (Jan. 26, 2015).

¹³ *Id.* at 2.

¹⁴ See Comments of the LNP Alliance, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 at 4 (July 25, 2014).

¹⁵ See *id.*

telecommunications system – something that the FCC should ensure will continue in tomorrow’s all-IP based telecommunications networks.

The FCC’s *NPRM* in this proceeding acknowledges that the vital interest of the public in competition, consumer protection, universal service, and public safety and national security remains constant notwithstanding the migration from TDM-based networks to IP-based networks.¹⁶ Local number portability administration is part and parcel of the mechanism by which communications providers can ensure these critical values are met:

- *Competition.* The LNPA’s services reduce the transaction costs for consumers and businesses to switch providers, allowing them to keep their existing telephone numbers and seamlessly port those numbers between providers in minutes.¹⁷
- *Consumer protection.* The competition enabled by rapid, seamless number porting generates valuable savings, innovations and added value for consumers and businesses. When a provider fails or discontinues service, seamless number portability allows consumers and businesses to remain connected with a new provider. In natural disaster and other mass emergency events, the NPAC offers vital disaster recovery functions to port telephone numbers from affected providers and rapidly restore service.¹⁸ Further, Fortune 500 companies, contact centers, economic development organizations and technology suppliers rely on the NPAC to ensure that their telemarketing activities comply with the requirements of the Telephone Consumer Protection Act.¹⁹
- *Universal service.* The LNPA serves as the authoritative database to enable routing on the nation’s telecommunications network, enabling any subscriber on any provider to reach one another.
- *Public safety and national security.* The LNPA offers vital services for law enforcement and national security agencies to obtain lawful access to subscriber information in the course of law enforcement investigations, and for public safety

¹⁶ *NPRM* ¶ 1.

¹⁷ See Neustar Comments, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 at 54 (July 25, 2014); Letter from Michele Farquhar, Counsel for Neustar, to Tom Wheeler, Chairman, FCC, CC Docket No. 95-116, WC Docket No. 09-109 at 6 (Feb. 24, 2014). The NPAC also enables network optimization that reduces carrier costs and upon which many carriers rely.

¹⁸ See *February Petition* at 13-14.

¹⁹ See Comments of the Professional Association for Customer Engagement, WC Docket No. 09-109 (Nov. 10, 2014).

answering points to obtain subscriber and location information for emergency response calls.²⁰

Congress required impartial number administration to enable a highly competitive communications marketplace while ensuring the reliability of the nation's telecommunications networks.²¹ The need to ensure these critical values are met – and that the LNPA continues to support them – is even greater as we migrate to an all-IP network environment. If the transition of the LNPA's functions to support IP-based services and networks is not fully considered and fully developed, the LNPA may prove unable to support these values for future IP-based networks, thereby undermining the FCC's planning for the IP transition as well as the IP transition plans of key industry and consumer stakeholders.

If consumers lose faith in their ability to port or experience reduced reliability in dialing, routing, rating, or billing in an IP-environment, competition will suffer. If the LNPA is unable to provide critical law enforcement and public safety services after the transition to IP, public safety will suffer. If costs increase for small carriers after the transition, competition will suffer. If IP-based numbering migrates to third-party registries and the NPAC's routing functions for IP-based services are hampered or limited as a result, universal service will suffer.²² To address these issues, the FCC must ensure that its plans to secure critical competition, consumer protection, universal service and public safety/national security values in the IP transition include a separate rulemaking examining the services and functions the LNPA will provide in support of

²⁰ See Letter from Michael A. Sussmann and Stewart A. Baker, Counsel for Neustar, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket No. 09-109 (Nov. 6, 2014).

²¹ See Telephone Number Portability, *First Report and Order and Further Notice of Proposed Rulemaking*, 11 FCC Rcd 8352 ¶ 2 (1996).

²² Indeed, throughout the LNPA selection process, Ericsson has consistently argued against investing in existing, ubiquitous neutral infrastructure such as the NPAC for IP routing, and has instead based its proposal on the implementation of more costly, proprietary solutions. See Reply Comments of the LNP Alliance, WC Docket No. 09-109, CC Docket No. 95-116 at 7-8, 11 (Aug. 21, 2014).

IP-based networks – issues presently ripe for consideration in the rulemaking proceeding the FCC is required to conduct to select the next LNPA.²³ The FCC should ensure that each LNPA vendor’s proposal is evaluated in specific light of the IP transition, to determine the costs and benefits for all stakeholders, including service providers and consumers.

Of particular note, avoiding detrimental impacts to the reliability and availability of communications services during the IP transition will require the development of detailed metrics for assessing the performance of new IP-based networks, and fallback options when those networks fail.²⁴ The FCC has proposed targeted metrics for the performance of IP-based communications services, and plans to conduct testbeds evaluating IP-based networks.²⁵ Similarly, the FCC has determined that the IP transition must also provide for a fallback mechanism.²⁶

In contrast, the LNPA Request For Proposal (“RFP”) failed to evaluate bidder performance against critical metrics for all LNPA services, or to establish a testing mechanism for proposed platforms. Similarly, the LNPA selection process included no mechanism to fallback to the currently operational LNPA in the event of a service disruption or failure by any replacement LNPA. In fact, a report by Smith & Associates examining Ericsson’s proposal to serve as the next LNPA found that “[n]o NPAC functionality or operational performance could have been compared prior to the NANC²⁷ recommendation because a new NPAC system from

²³ See *infra* Section IV.

²⁴ *NPRM* ¶ 25.

²⁵ “[B]efore policymakers can state with confidence that any new technology is comparable to or better than existing network technology, [they] must know the metrics by which to compare the two. The Commission should therefore establish the metrics by which it will evaluate new technologies.” See *id.* ¶ 25, citing Letter from Jodie Griffin, Senior Staff Attorney, Public Knowledge, to Marlene Dortch, Secretary, FCC, GN Docket No. 12-353 et al., at 1 (Sept. 17, 2014).

²⁶ See *generally id.* ¶¶ 31-48 (addressing need for continuity of power).

²⁷ North American Numbering Council.

[Ericsson's unit] 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."²⁸ Similarly, Smith & Associates found that the Ericsson proposal's lack of "a well thought out fail back strategy could easily result in many hours, if not days, of transactional data lost," which constitutes "a very important and unmitigated risk."²⁹

IP-based services such as VoIP that consume numbering resources represent a central element of the IP transition. A successful transition to IP technologies, therefore, will require a careful, thorough and public review of the numbering resources necessary to support the IP services intended to replicate and ultimately replace the TDM-based voice and data communications businesses and consumers use today.

IV. A RULEMAKING IS THE APPROPRIATE MECHANISM TO ASSESS THE IMPACT OF CRITICAL TECHNOLOGY TRANSITIONS

The FCC initiated the present proceeding as a rulemaking and invited stakeholders to provide input on the risks and benefits of transitioning from TDM to IP-based networks in the interest of ensuring that the public interest, competition and public safety were not compromised.³⁰ In contrast, the FCC has failed to initiate a rulemaking proceeding, or even propose ways to involve consumers and other stakeholders, as part of the pending LNPA selection process.³¹

²⁸ See Smith & Associates, Technical Evaluation of the Next Generation NPAC/SMS Proposal at 4 *attached to* Letter from Thomas McGovern III, Counsel for Neustar, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket No. 09-109 (Jan. 28, 2015).

²⁹ See *id.* at 23. Furthermore, as filed in response to the RFP, Ericsson's proposal also failed to recognize the exponentially greater risks of "[t]ransitioning to a newly developed system," or develop or propose mitigation strategies and plans. See *id.* at 33.

³⁰ *NPRM* ¶ 8. The Commission acknowledges that stakeholder feedback on this technology transition is so important that it actually proposes creating an expanded, ongoing right to comment that would allow the public to directly address a carrier's proposed changes in service offerings. *Id.* ¶ 78; see also *id.* ¶ 60 (seeking comment on consumer protection, noting that the FCC's Part 51 rules currently do not make any provision for retail customers).

³¹ *Id.* (noting the FCC's efforts at consumer engagement during the DTV technology transition).

As in the case of the transition from TDM to IP-based networks, a notice of proposed rulemaking is essential to the LNPA selection process. It would ensure that interested parties learn about potentially momentous changes and allow them to comment on them.³² Conducting a rulemaking is not optional: the Supreme Court has found that the Commission’s designation of a new entity to serve as LNPA is an “exercise [of] its rulemaking authority” that requires issuance of an NPRM, adoption of a Report and Order, and other APA-mandated procedures.³³ Section 251(e)(1), which obligates the FCC to manage the telephone numbering system, necessitates the FCC initiating such a rulemaking.³⁴

The FCC’s Wireline Competition Bureau (“Bureau”) did issue orders in March and May 2011 in the LNPA docket, but they sought comment on and ultimately approved a process for the North American Numbering Council (“NANC”) to evaluate vendors; they did not establish any criteria to govern the FCC’s actual selection of the LNPA or allow public input on such criteria.³⁵ The FCC released a Public Notice in June 2014, but only to seek comment on the

³² See, e.g., Comments of Neustar, Inc., WC Docket No. 09-109, CC Docket No. 95-116 at 61 (July 25, 2014). For a complete explanation of the need for a notice and comment rulemaking, see Letter from Aaron Panner, Counsel for Neustar, to Marlene Dortch, Secretary, FCC, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (May 19, 2014), which we incorporate fully by reference.

³³ Letter from Aaron Panner, Counsel for Neustar, to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket No. 09-109 at 19 (Sept. 23, 2014), citing *AT&T Corp. v. Iowa Utils. Bd.*, 525 U.S. 366, 382 n.9 (1999).

³⁴ “The Commission shall create or designate one or more impartial entities to administer telecommunications numbering and to make such numbers available on an equitable basis.” 47 U.S.C. § 251(e)(1). A vendor may implement numbering services such as portability under contract, but by law the obligation to oversee the system remains with the FCC.

³⁵ Petition of Telcordia Technologies Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration and to End the NAPM LLC’s Interim Role in Number Portability Administration Contract; Telephone Number Portability, *Order and Request for Comment*, 26 FCC Rcd 3685 (WCB 2011); Petition of Telcordia Technologies Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration and to End the NAPM LLC’s Interim Role in Number Portability Administration Contract; Telephone Number Portability, *Order*, 26 FCC Rcd 6839 (WCB 2011).

NANC's already-final recommendation of an LNPA vendor; moreover, the critical materials on which the Commission sought comment were not publicly available.³⁶

At no point did the FCC seek input on critical issues such as how a LNPA transition, if one should take place, should be accomplished, or how to assess the risks of such a potential transition for consumers, competition, and public safety. Instead, the sole basis of any performance parameters for the LNPA are set out in a single RFP,³⁷ which was assembled with little input from the public and affected stakeholders (including small carriers and public safety agencies). It also failed to address critical transition issues or include a yardstick for measuring negative effects on stakeholders or the consequences to the viability of a bidder that did not address these issues substantively, including the implications for the pricing in its bid proposal.³⁸ The FCC's Public Notice seeking comment on the NANC's recommendation for the next LNPA was a perfunctory statement regarding the NANC's recommended vendor, devoid of analysis framing the critical implications of an LNPA transition for consumers, competition and public safety. Moreover, the Public Notice failed to provide the public and affected stakeholders with access to any of the underlying record the NANC was required to develop in the course of its evaluation and recommendation.³⁹ This failure to allow the public to engage in the LNPA

³⁶ Commission Seeks Comment on the North American Numbering Council Recommendation of a Vendor to Serve as Local Number Portability Administrator, *Public Notice*, 29 FCC Rcd 6013 (WCB 2014). The FCC sought comment on various materials produced by the NANC, SWG and FoNPAC that were only available pursuant to a Protective Order. *Id.*

³⁷ See 2015 LNPA RFP, available at http://www.napmlc.org/pages/npacrfp/npacRFP_RefDocs.aspx.

³⁸ USTelecom, CTIA, Verizon, Sprint, T-Mobile, CenturyLink and XO Communications argue that the cost of transitioning to a new LNPA would be "irrelevant," because transition costs are expected as part of any procurement process. See Letter from B. Lynn Follansbee, Vice President, Law & Policy, USTelecom to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket No. 09-109 (Feb. 4, 2015). However, the failure of the NAPM or the NANC to conduct any meaningful evaluation of transition costs could result in increased network operations costs for vendors of over \$1 billion during the first post-transition year, which could have devastating implications for both carriers and consumers, who would have to bear the brunt of this cost increase. See *supra* at n. 12.

³⁹ See *supra* at n. 36.

selection process in any meaningful way to date is further reason for the FCC to conduct a rulemaking proceeding now.

In the current proceeding the FCC seeks comment on critical transition issues including, for example, whether carriers should be required to demonstrate, before switching away from TDM service delivery, that any IP-supported networks or network components offer comparable communications security, integrity, and reliability.⁴⁰ Similarly, the FCC should follow this same model in the parallel and closely related LNPA selection process, to ensure that the Commission has fully considered and developed requirements for successfully migrating numbering administrative functions needed to support the IP transition and for mitigating the risks of a failed transition.

⁴⁰ *NPRM* ¶ 99.

V. CONCLUSION

The IP transition and number administration are inextricably linked. A rulemaking to select the next LNPA will allow the Commission—and the public—to assess fully the effect of the IP transition on carriers, businesses and consumers. Failing to gather and assess stakeholder input could damage the public interest, undermine competition and threaten public safety.

Respectfully submitted,

By: */s/ Leonard Kennedy*

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