

March 4, 2015

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:

I am writing on behalf of the North American Portability Management LLC (the "NAPM LLC"), as outside general counsel to the NAPM LLC. This law firm has acted as outside general counsel to the NAPM LLC since the NAPM LLC's formation in November 1999, and the law firm currently is acting as outside general counsel to the NAPM LLC.

As of the date of this letter, the following companies are Members of the NAPM LLC: (1) AT&T, Inc.; (2) Bandwidth.com, Inc.; (3) Comcast Corporation; (4) Qwest Corporation, d/b/a Century Link; (5) Sprint Nextel Corporation; (6) Time Warner Enterprises, Inc.; (7) T-Mobile US, Inc.; (8) Verizon Communications, Inc.; (9) Vonage Holdings Corp.; and (10) XO Communications, Inc.

In March 2009, the NAPM LLC formed the Future of the NPAC (the "FoNPAC") subcommittee. The formation of the FoNPAC was reported by the NAPM LLC to the North American Number Council on October 15, 2009. On June 8, 2011, the FoNPAC was constituted as a formal advisory committee of the NAPM LLC under its operating agreement, open to all Members of the NAPM LLC, and providing expressly that any action appropriately approved by the FoNPAC shall be presented only as a recommendation to the full NAPM LLC, for approval by the Members of the NAPM LLC.

In October 2013, at the time that the FoNPAC members voted to recommend to the NAPM LLC to select the LNPA in all seven United States Regions, the NAPM LLC also had ten Members, but those Members were not the same as they are today. In October 2013, Level 3 Communications, Inc. was a Member, and Bandwidth.com, Inc. was not a Member; otherwise, the other Members were the same. Therefore, the following companies were Members of the NAPM LLC in October 2013: (1) AT&T, Inc.; (2) Comcast Corporation; (3) Qwest Corporation, d/b/a Century Link; (4) Level 3 Communications, Inc.; (5) Sprint Nextel Corporation; (6) Time Warner Enterprises, Inc.; (7) T-Mobile US, Inc.; (8) Verizon Communications, Inc.; (9) Vonage Holdings Corp.; and (10) XO Communications, Inc.

At that time, nine of the ten Members of the NAPM LLC were represented on the FoNPAC. No representative of Vonage Holdings Corp. was on the FoNPAC.

In January 2014, when the Members of the NAPM LLC voted to approve the recommendation of the FoNPAC regarding the selection of the LNPA in all United States Regions, the Members of the NAPM LLC were the same as they were in October 2013.

Very truly yours,

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Dan A. Scullo

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