



N A R U C  
National Association of Regulatory Utility Commissioners

March 18, 2015

The Honorable Thomas Wheeler  
Chairman  
Office of the Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

**Re: Notice of Written Ex Parte Communication filed *In the Matter(s) of Telephone Number Portability, et al.* CC Docket No. 95-116; WC Docket No. 07-149; WC Docket No. 09-109**

Dear Chairman Wheeler,

On March 4<sup>th</sup>, the FCC issued a fact sheet outlining a draft order circulated on the shift of the contract to administer local number portability from Neustar to Telecordia.

The National Association of Regulatory Utility Commissioners agrees that “[m]aintaining the integrity and availability of the porting system is paramount.” State public service commissions, like law enforcement officials, have a crucial and overriding interest in a smooth and seamless transition.

According to press accounts, the draft order circulated for action at the upcoming March agenda meeting “includes provisions to ensure a smooth transition and to protect the integrity and availability of the system during and after the transition.” Indeed, the FCC notes in its March 4<sup>th</sup> “Fact Sheet” that the agency will “oversee the transition to ensure that matters affecting the public interest, such as public safety and security, are fully addressed in the contract terms, and to ensure that any transition occurs efficiently and seamlessly.”

***NARUC believes the agency, in its oversight role, should require an adequate time frame for a proper transition. Moreover, the FCC should, before finalizing any transition plan, seek input from interested stake-holders, including NARUC’s member public service commissions, which regularly interact with the current administrator, on any draft transition plan’s components.***

Respectfully submitted,

James Bradford Ramsay  
NARUC General Counsel

cc Daniel Alvarez, Office of the Chairman  
Rebekah Goodheart, Office of Commissioner Clyburn  
Priscilla Argeris and Travis Litman, Office of Commissioner Rosenworcel  
Nick Degani, Office of Commissioner Pai  
Amy Bender, Office of Commissioner O’Reilly