

March 19, 2015

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, NW  
Washington, DC 20554

Re: *Telephone Number Portability, et al.*, CC Docket No. 95-116, WC Docket Nos.  
07-149 & 09-109

Dear Ms. Dortch:

On March 19, 2015, I, on behalf of Telcordia Technologies, Inc., d/b/a iconectiv (“Telcordia”) spoke with Lisa Gelb and Sanford Williams, both of the Wireline Competition Bureau. I also left a voicemail message for Rebekah Goodheart, Legal Advisor to Commissioner Clyburn. The content of these conversations is summarized below.

Neustar, echoed by Michael Calabrese, has made two proposals with respect to the transition. First, it proposes that the Commission establish an independent “transition overseer.” However, the charge of this independent monitor extends far beyond facilitating the transition, apparently to oversight that the Commission would conduct in approving any voting trust and other roles more appropriate for the NANC. Telcordia’s transition plan envisions using a third party to assist in program managing transition functions, but the type of “transition overseer” that Neustar proposes would not be helpful. Instead, it simply adds duplicative review layers.

Even more remarkably, Neustar—whose contracts have not been subject to FCC review and approval—now proposes that this be done for the first time. Telcordia has no concern about its ability to pass such a review, but has substantial concern about the delay that such a review would inject into an already long-delayed implementation process. Such a review is not legally required, and has the potentially substantially to harm industry and consumers by adding further delay. Moreover, there will likely be provisions of the contract that are not appropriate for public—or even limited security-cleared—review, such as provisions regarding network and

Ms. Marlene H. Dortch

March 19, 2015

Page 2 of 2

national security. So the Commission should deny this request, consistent with the practices that have been applicable to Neustar. The Commission will, of course, retain oversight and can empower NANC to continue to do so.

Sincerely,



John T. Nakahata

*Counsel for Telcordia Technologies, Inc.*

*d/b/a iconectiv*

cc:

Lisa Gelb  
Sanford Williams  
Rebekah Goodheart  
Ruth Milkman  
Daniel Alvarez  
Priscilla Delgado Argeris  
Michele Ellison  
Joel Rabinovitz  
Ken Moran

Amy Bender  
Nicholas Degani  
Travis Litman  
Julie Veach  
Randy Clarke  
Ann Stevens  
Michelle Sclater  
Allan Manuel