

March 20, 2015

Marlene Dortch
Secretary, Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Electronically Filed

Re: CC Docket No. 95-116; WC Docket No. 09-109; WC Docket No. 07-149

Dear Ms. Dortch:

The Federal Communications Commission is submitting the attached letter received yesterday before Sunshine but not filed in ECFS, as part of the record in CC Docket No. 95-116, WC Docket No. 09-109 and WC Docket No. 07-149.

Sincerely,

Sanford S. Williams
Assistant Chief, Competition Policy Division
Wireline Competition Bureau

Mignon Clyburn, Commissioner
Federal Communications Commission
445 12th Street SW
Washington, DC 20544

20 March 2015

Dear Commissioner Clyburn:

Re: Numbering Portability Administration Contract (NPAC)

I write in reference to the above-captioned matter, and the Treaty between the United States and the Czech and Slovak Federal Republic Concerning the Reciprocal Encouragement and Protection of Investment (entered into force 19 December 1992 and acceded to by the Czech Republic 1 January 1993).

I am the principal of a family office that is a "national" of the Czech Republic, and that holds publicly traded shares that constitute an "investment" in Neustar, Inc., as those terms are defined by the Treaty. Accordingly, this investment is subject to the protections of the Treaty, including, without limitation, the right to be "at all times accorded fair and equitable treatment", and not to be "impair[ed] by arbitrary and discriminatory measures." The Treaty entitles an investor to bring an action in arbitration against the United States for damages for violations of the Treaty, without the need for diplomatic intervention.

I understand that the captioned matter will be considered by the Commission on 26 March, and that, specifically, the Commission will consider awarding the NPAC to Telecordia. Among other things, such a decision would culminate a series of violations of the clear procedural requirements governing the NPAC award process, and would violate substantive legal requirements as well, including the neutrality requirement. Such a decision also would seriously impair any investment in Neustar. I trust you will have a full appreciation of the basis for the foregoing statements from other submissions in this matter, and I will not review them here.

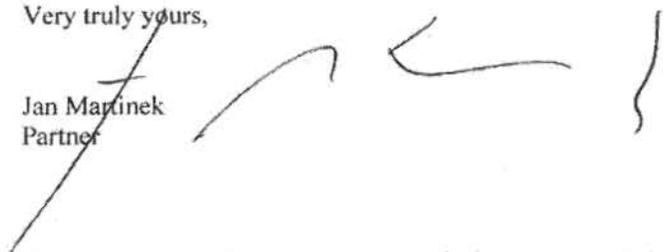
While you might not previously have considered them, I trust you now also will appreciate that an award to Telecordia of the NPAC would, in the present circumstances, further violate the broad, normative standards of the Treaty. These are independent legal standards under international law, for which the violations of domestic law are aggravating circumstances.

I would expect that both the legal and ethical standards governing the decisions of the Commission, and of individual Commissioners, require compliance with, among other things, the standards of international law. I write to confirm that you are aware of those standards in advance of your decision.

I am sending this letter to each of your Commission colleagues. You are welcome to contact me if you require further information on jan.martinek@CECapitalPartners.com

Very truly yours,

Jan Martinek
Partner



Central European Capital Partners, Brehova 6, Prague 1, 110 00, Czech Republic