

KELLOGG, HUBER, HANSEN, TODD, EVANS & FIGEL, P.L.L.C.

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March 26, 2015

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

*Electronically Filed*

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

Dear Ms. Dortch:

I write on behalf of Neustar, Inc., to express our dismay at the Commission's latest actions in contravention of the rules and sound administrative procedure – namely, the negotiation of major modifications to a proposed Commission rule, done at the last-minute, without any opportunity for public comment or for meaningful evaluation by decision-makers. The purpose of the Sunshine period is to ensure that such last-minute, backroom deals do not occur. And under section 1.1206(b) of the Commission's rules, all parties have a right to respond to Ericsson's latest ex parte communication *before* the Commission takes action. Neustar received notice that an ex parte had been filed after 7:00 pm last night; most interested persons will see Ericsson's filing well after the public meeting has ended.

Make no mistake: the only reason for the latest filings is that the item could not be voted without Ericsson's latest concessions. But if that is so, then it is irresponsible to permit action to be taken when no one has had a chance to comment on the adequacy of Ericsson's assurances. Such actions betray an ends-justifies-the-means mentality and a lack of respect for the rule of law. Commissioners who do not share in this attitude should ask for the item in this docket to be taken off the public meeting agenda to permit fair comment on Ericsson's latest effort to dodge the legal requirement that the LNPA be impartial and neutral.

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Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Sincerely,



Aaron M. Panner

cc: Chairman Wheeler  
Commissioner Clyburn  
Commissioner Rosenworcel  
Commissioner Pai  
Commissioner O'Rielly  
Jonathan Sallet  
Julie Veach  
Ruth Milkman  
Daniel Alvarez  
Rebekah Goodheart  
Travis Litman  
Nicholas Degani  
Amy Bender  
Michele Ellison