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**VIA ELECTONIC DELIVERY**

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,

On March 19, 2015, on behalf of Neustar, Inc., Harold Furchtgott-Roth, of Furchtgott-Roth Economic Enterprises, and Brett Shumate and I, both of Wiley Rein LLP, met with Nicholas Degani, legal advisor to Commissioner Ajit Pai, Amy Bender, legal advisor to Commissioner Michael O’Rielly, and Commissioner Michael O’Rielly to discuss issues related to the above-captioned dockets, including the attached paper previously submitted into the record

Our discussion focused on Ericsson’s lack of impartiality and neutrality. We reiterated Neustar’s position that Telcordia—a wholly owned subsidiary of Ericsson—cannot serve as the LNPA because it is neither impartial nor neutral: (a) Ericsson is a manufacturer of telecommunications network equipment, which disqualifies Telcordia from serving as the LNPA under Section 52.26(a) of the Commission’s rules; (b) Ericsson is inextricably intertwined with the U.S. wireless industry, which disqualifies Telcordia under Section 52.21(k) of the Commission’s rules; and (c) Ericsson stands in the shoes of at least one telecommunications service provider by virtue of its managed services agreements, which disqualifies it under Section 52.12(a) of the Commission’s rules. Any one of these three deficiencies is sufficient to preclude Telcordia from serving as the LNPA.

We also explained that, contrary to Ericsson’s recent assertions,<sup>1</sup> a voting trust could not lawfully cure Ericsson or Telcordia’s lack of impartiality under Section 251(e)(1) of the Telecommunications Act. The fact that both Ericsson and

<sup>1</sup> See Letter from John T. Nakahata to Marlene H. Dortch, CC Docket No. 95-116, WC Docket Nos. 07-149 & 09-109 (filed Mar. 17, 2015) (“March 17 Ex Parte Letter”); Letter from John T. Nakahata to Marlene H. Dortch at 3-4, CC Docket No. 95-116, WC Docket Nos. 07-149 & 09-109 (filed Mar. 16, 2015).