

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

*In the Matter of:*

Petition of Telcordia Technologies, Inc. to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration

WC Docket No. 07-149

Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute a Competitive Bidding for Number Portability Administration, and to End the NAPM LLC’s Interim Role in Number Portability Administration Contract Management

WC Docket No. 09-109

Telephone Number Portability

CC Docket No. 95-116

**REPLY COMMENTS OF TELCORDIA TECHNOLOGIES, INC. D/B/A ICONECTIV  
REGARDING NAPM TRANSITION OVERSIGHT PLAN**

The Transition Oversight Plan (“Plan”)<sup>1</sup> submitted by the North American Portability Management (“NAPM”) LLC establishes an effective framework for managing the transition. Telcordia supports the framework and looks forward to working with NAPM and all industry stakeholders – and stakeholders from outside the industry such as state public utility commissions, public safety, national security, and telemarketers – to implement the transition. Although some of the comments in this proceeding called for additions or changes to the Plan, it bears emphasis that the Plan is organic, and NAPM had committed to update it “as appropriate.”

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<sup>1</sup> The North American Portability Management LLC Transition Oversight Plan, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116 (filed Apr. 27, 2015) (“Plan”).

Telcordia believes that the comments will provide NAPM with useful feedback in considering future updates to the plan.

The LNP Alliance also comments with respect to Telcordia's draft voting trust agreement.<sup>2</sup> Several of the items about which LNP Alliance complains are features of the Neustar/Warburg Trust Agreement that the Commission specified as the guide in drafting the Telcordia trust.<sup>3</sup> For example, the list of matters on which the beneficial owner may direct the vote, rather than being voted in the trustees' discretion, is substantially similar to the exclusions reserved to Warburg.<sup>4</sup> Similarly, LNP Alliance proposes to strike language on the removal of a trustee (in section 3.3 of the Telcordia Voting Trust) that corresponds directly with provisions of the Neustar/Warburg Trust.<sup>5</sup> LNP Alliance also proposes further restrictions on who may serve as a voting trustee, none of which were imposed in the Neustar/Warburg Trust;<sup>6</sup> these added restrictions are wholly unnecessary since the Commission must approve all trustees – a requirement that goes beyond any provision of the Neustar/Warburg Trust.<sup>7</sup>

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<sup>2</sup> Comments of the LNP Alliance on the North American Portability Management LLC Transition Plan and the Draft Voting Trust Agreement, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116 (filed May 21, 2015) (“LNP Alliance Comments”).

<sup>3</sup> *Telephone Number Portability, et al.*, Order, FCC 15-35, 30 FCC Rcd. 3082, 3160 n.633 (rel. Mar. 27, 2015) (“*Selection Order*”) (“We expect that the voting trust will be in substantially the same form as that used in the *Warburg Transfer Order*.”)

<sup>4</sup> See Exhibit B, at 4, to Amended Request for Expedient Review of the Transfer of the Lockheed Martin Communications Industry Services Business, CC Docket No. 92-237 (filed August 16, 1999) (“Neustar/Warburg Trust”). The list of exclusions was also approved by the Commission in *Selection Order*, at n.631.

<sup>5</sup> See *id.* at 8-9.

<sup>6</sup> LNP Alliance proposes a ten-year ban on a familial or business connection with Telcordia and extends the ban to any person that was associated with a telecommunications equipment manufacturer within that ten-year period.

<sup>7</sup> LNP Alliance also proposes a new section 1.5 to specify Commission review of certain Telcordia transactions. These provisions also exceed anything that applied to Neustar and

The transition remains in its early stages. Telcordia looks forward to working with a broad range of stakeholders as the transition moves forward.

Respectfully submitted,



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are unnecessary. Telcordia is subject to neutrality requirements and will be audited for compliance with those requirements every six months.