

**Before the
Federal Communications Commission
Washington, DC 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 Competitive Bidding for Number Portability Administration and to End the NAPM LLC’s Interim Role in Number Portability Administration Contract)	WC Docket No. 09-109
)	
)	
Telephone Number Portability)	CC Docket No. 95-116

REPLY COMMENTS OF NEUSTAR, INC.

Neustar, Inc. (“Neustar”) respectfully submits these reply comments in response to the Public Notice released by the Wireline Competition Bureau (“Bureau”) in the above-captioned proceedings (“*Public Notice*”).¹ In the *Public Notice*, the Bureau seeks comment on the North American Portability Management LLC’s (“NAPM’s”) Transition Oversight Plan (“Plan”)² relating to the Federal Communications Commission’s (“Commission’s”) selection of Telcordia Technologies, Inc. d/b/a iconectiv as the next local number portability administrator (“LNPA”).³

¹ *Wireline Competition Bureau Seeks Comment on the North American Portability Management LLC’s Transition Oversight Plan for Local Number Portability Administrator Contract*, WC Docket Nos. 07-149 and 09-109, CC Docket No. 95-116, Public Notice, DA 15-554 (WCB May 7, 2015) (“*Public Notice*”).

² *The North American Portability Management LLC Transition Oversight Plan*, attached to Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 07-149 and 09-109, CC Docket No. 95-116 (Apr. 27, 2015).

³ *Public Notice* at 1.

In support of the transition generally, and the transition oversight plan elements that will involve Neustar specifically, Neustar is establishing a separate LNPA Transition Management Office (“TMO”) that will be comprised of industry experts, including IT specialists. The TMO will be directed by Mr. Michael Krieger who will be joined by Ms. Priscilla Guthrie and Mr. Roger Loeb.⁴ The TMO will be responsible for ensuring that Neustar meets the requirements established during the transition. Throughout the transition, Neustar will separately continue to fulfill its responsibilities as the LNPA, and this transition team will allow the current Number Portability Administration Center (“NPAC”) team to focus exclusively on providing high-quality service.

In addition to its role as the NPAC administrator, Neustar currently offers additional numbering services at “arm’s length” from its NPAC operations – including Service Order Administration (“SOA”)/Local Service Management System (“LSMS”) services and National Pooling Administration. Neustar will continue to act in those capacities throughout the necessary testing and transition phases as laid out in the NAPM’s Plan, in addition to fulfilling its responsibilities as the LNPA. Notwithstanding Neustar’s recognition that the Plan is still subject to refinement and revision, as a commercial services operator we are keenly interested in the NAPM’s expectations for the certification of platforms and services interacting with the new NPAC – particularly related to entry/exit criteria and adequacy of time. We are committed to engaging with the NAPM and its third-party Transition Manager in this capacity, along with similarly situated stakeholders.

Neustar believes that the public release of the Plan, and the *Public Notice* seeking comment, are important steps that will encourage participation and discussion of critical issues

⁴ More information on the experience of Mr. Krieger, Ms. Guthrie and Mr. Loeb in managing complex information technology projects can be found in Neustar’s recent press release. *See* attachment.

throughout the transition process. The Commission’s LNPA Order stated that “the plan should include oversight, timelines, performance benchmarks, incentives, dispute resolution, testing, stakeholder outreach and education (with emphasis on smaller providers), and steps to ensure security and reliability.”⁵ Neustar understands that the NAPM “will update the Plan as appropriate.” As the details of the Plan are further developed, Neustar and NPAC users will be able to provide additional meaningful input and assistance.⁶

Neustar is committed to doing our part to ensure a successful transition.

Respectfully submitted,

By: /s/ Leonard J. Kennedy

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⁵ *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration; Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration, and to End the NAPM LLC’s Interim Role in Number Portability Administration Contract Management*, WC Docket Nos. 07-149 and 09-109, CC Docket No. 95-116, Order, FCC 15-35, ¶ 156 (Mar. 27, 2015).

⁶ For instance, Neustar looks forward to meeting with the third-party Transition Manager after it is named so we can better understand the respective roles and responsibilities of the third-party Transition Manager, Neustar and Telcordia. Moreover, the role and parameters of the Transition Manager in the dispute resolution process will need to be further developed to ensure that the selected arbitrator is impartial, neutral and fair in dealing with any potential disputes.