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March 3, 2016

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VIA ELECTRONIC FILING

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

Re: *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 No. 09-109; Telephone Number Portability, CC Docket No. 95-116*

Dear Ms. Dortch,

Please find attached hereto a letter from Mr. Michael E. Krieger, on behalf of Neustar, to Mr. Greg Chiasson, LNPA Transition Oversight Manager, PricewaterhouseCoopers (Mar. 3, 2016) concerning the transition of Enhanced Law Enforcement Platform (“ELEP”) Services, Intermodal Ported Telephone Number List Services, and the NPAC IVR (referred to as “Ancillary NPAC Services”).

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

Thomas J. Navin

Enclosure

cc: Rear Admiral David G. Simpson (Ret.), Chief
Public Safety & Homeland Security Bureau
Matt DelNero, Chief, Wireline Competition Bureau
Kris Monteith, Deputy Chief, Wireline Competition Bureau
Diane Cornell, Senior Counsel, Office of Chairman Tom Wheeler
Tim Decker, NAPM LLC Co-Chair
Tim Kagele, NAPM LLC Co-Chair
William Reilly, PwC

ATTACHMENT



March 3, 2016

Via Electronic Mail

Greg Chiasson
LNPA Transition Oversight Manager
PricewaterhouseCoopers
One North Wacker
Chicago, Illinois 60606

Dear Greg:

Following up our discussion at the February 25, 2016 joint vendor meeting with you, the NAPM, and iconectiv, Neustar respectfully writes to reiterate our position regarding the transition of Enhanced Law Enforcement Platform (“ELEP”) Services, Intermodal Ported Telephone Number List Services, and the NPAC IVR (the “Ancillary NPAC Services”). As we have stated, following the transition from Neustar to iconectiv in the first of the seven NPAC regions, Neustar will no longer be able to provide the Ancillary NPAC Services in regions where Neustar is not the NPAC administrator because it will no longer be in a position to verify the integrity of the data upon which these services rely.

Neustar has repeatedly informed the Transition Oversight Manager, the NAPM, and iconectiv of this position so that all stakeholders would have ample time to plan for the transition of these critical services.¹ However, based on representations by iconectiv at our February 11, 2016 joint vendor meeting, there still appears to be disagreement on the migration timing. Neustar wants to ensure that all parties are aware of the planned timing for transitioning the Ancillary NPAC Services so it can properly be reflected in the NAPM's contract with iconectiv.

Neustar's contract with the NAPM only authorizes Neustar to provide Ancillary NPAC Services in the regions where Neustar is operating as the LNPA. Moreover, NAPM and iconectiv have determined that the entities that currently use or rely on these Ancillary NPAC Services would be better served if they were required to connect to only one LNPA, rather than be required to get data from two LNPAs. Neustar is in full agreement with this assessment.

To support the goal of transitioning to one provider with minimal disruption, Neustar has been proactive in providing the NAPM and iconectiv with: 1) information explaining the Ancillary Services and their functionality; 2) Neustar proprietary design information, including the Web Services Description Language (“WSDL”) used by mechanized ELEP users to access the system, which iconectiv is free to replicate; and 3) the complete 10-year history of ELEP data.

¹ Neustar informed the parties of its position at the joint vendor meetings on October 13, 2015, November 17, 2015, and December 2, 2015.

In the limited circumstances in which Neustar is solely capable as the incumbent LNPA to assist in the transition (*i.e.*, providing billing services for the TOM), Neustar is willing to negotiate a transition services agreement for the provision of those additional services. In all other circumstances, the NAPM should look to iconectiv, as the incoming LNPA, to provide required services, and not Neustar. With regard to the Ancillary NPAC Services, including the ELEP service, we understand that iconectiv is fully capable of providing these services prior to the transition of the first region.²

ELEP service is relied upon by law enforcement to obtain accurate information on approximately four million telephone numbers each year. Given the importance of this service and the critical need for accurate information, Neustar cannot accept responsibility for providing law enforcement organizations with potentially incorrect data under the control of a third party. Neustar has provided exceptional service to federal, state and local law enforcement agencies since 2006; however, once the NPAC transition has begun and Neustar is no longer the LNPA with control over all NPAC data – because of the associated risk of data loss or corruption over which Neustar has zero control – Neustar cannot be expected to deliver ELEP services.

The risks of data loss or corruption from a flash-cut of the NPAC data should not be underestimated. The NPAC transition involves over 10 billion data elements for more than 720 million U.S. phone numbers (approximately 80% of telephone numbers in service).³ iconectiv's commitment to develop its NPAC solution from scratch implies the use of a data model that is different from that of Neustar's platform, creating an even greater likelihood of errors in translating data from one platform to the other. Furthermore, at the time of this writing no comprehensive testing or recovery plan has been published, which would otherwise mitigate the probability of defects in the data translation process. Given all of the above, even a conservative estimate of errors introduced by the transition results in a volume of data-related impacts – to service providers, consumers, and law enforcement – which outside experts have projected could be in the millions.⁴

A key to data integrity is the end-to-end control of the data. Based on our experience as the LNPA, and by having control over this data today, Neustar can assure all parties that: (1) the NPAC system is secure and the data is protected; (2) the integrity of the supply chain utilized by third parties for systems and/or networking equipment is intact; (3) it applies good engineering practices, including the injection and subsequent validation of known data at both the front and back-end of the system; (4) the system-development process has been protected from tampering by malicious actors; and (5) the institution of mature audit procedures specific to the data elements that feed the

² iconectiv asserts that it will “provide all of the functionality of the current NPAC—including ELEP—and there will be no ‘significant gaps’ in service or functionality...” Letter from John T. Nakahata, Counsel to Telcordia Technologies, Inc., d/b/a iconectiv, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 95-116; WC Docket Nos. 07-149, 09-109 (filed Oct. 27, 2014). *See also Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116, ¶¶ 99-100 (rel. Mar. 27, 2015).

³ By the middle of 2017, when the transition appears to be targeted for completion, this figure is projected to rise to 740-750 million telephone numbers in the database.

⁴ *Estimating the Costs Associated with a Change in Local Number Portability Administration*, Dr. Hal Singer, Economists, Inc., at 3 (Feb. 11, 2014).

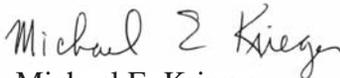
ELEP service are in place. Once Neustar's end-to-end control of the data is broken, Neustar has no way of knowing whether the system and/or the data have been corrupted and thus no way of ensuring the integrity of the data.

For all these reasons, Neustar would be taking on an unacceptable risk by continuing to provide life-critical information to law-enforcement agencies following the transition of the first NPAC region to iconectiv. The responsibility for providing this service must reside with iconectiv because it will be accountable for the integrity of the data following transition, and is in the best position to guarantee that the data provided to law enforcement is accurate.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Neustar, Inc.


Michael E. Krieger
President/CEO
Krieger Consulting LLC
Supporting Neustar Transition Office

cc: Rear Admiral David G. Simpson (Ret.), Chief, Public Safety & Homeland Security Bureau
Matt DelNero, Chief, Wireline Competition Bureau
Kris Monteith, Deputy Chief, Wireline Competition Bureau
Diane Cornell, Senior Counsel, Office of Chairman Tom Wheeler
Tim Decker, NAPM LLC Co-Chair
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