

May 2, 2016

VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Notice of Ex Parte Presentation -- Neustar's Application for Review of the Second Protective Order, Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration, WC Docket 07-149, WC Docket 09-109, CC Docket 95-116**

Dear Secretary Dortch:

On April 29, 2016, the Co-Chairs of the North American Portability Management LLC ("NAPM LLC"), Tim Decker and Tim Kagele, and I met with Diane Cornell, Special Counsel, Office of the Chairman, Rebekah Goodheart, Legal Advisor to Commissioner Clyburn, Travis Litman, Legal Advisor to Commissioner Rosenworcel, Amy Bender, Legal Advisor to Commissioner O'Rielly, Kris Monteith, Deputy Bureau Chief, Wireline Competition Bureau, and Ann Stevens, Deputy Division Chief, Competition Policy Division, Wireline Competition Bureau.

During the meetings, we discussed the importance of promptly approving the Master Services Agreement between Telcordia Technologies, Inc., d/b/a iconectiv and the NAPM LLC (the "New MSA"), the reasons why the Federal Communications Commission ("FCC" or "Commission") should promptly deny Neustar, Inc.'s Application for Review of the Wireline Competition Bureau's ("Bureau") March 31, 2016 Second Protective Order ("AFR"), and the potential impact on consumers and the industry of further delay.

The New MSA features numerous improvements over the MSA with Neustar. Among other things, the New MSA features:

- Significant cost savings that begin immediately upon cutover;
- Greatly improved, robust provisions regarding data security and privacy that were developed in coordination with the FCC and various federal agencies, including those responsible for law enforcement and homeland security; and
- The incorporation of the lessons learned by the NAPM LLC over the decades since local number portability was first deployed.

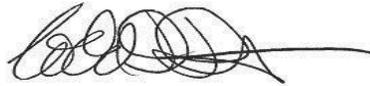
Time is of the essence for approval of the New MSA. Under the current MSA with Neustar, the cost of NPAC services to the industry is nearly \$500M per year. Indeed, until the NAPM LLC and Neustar executed Statement of Work ("SOW") 97, the cost was set to increase by 6.5% each year. The cost of NPAC services to the industry under the New MSA will be significantly less than half of the cost of Neustar provided NPAC services, and it will reduce each year over the term of the New MSA. Accordingly, the cost of delay is significant, and the industry will lose out on tens of millions of dollars in savings for each month that transition is unnecessarily delayed. Moreover, unless the New MSA is approved very soon, the transition dates may have to be extended beyond the third quarter of 2017, which means that the dates would likely have to be extended into the first quarter of 2018 due to the hold on

NPAC changes, because of significant increased porting activity, during the holidays. Therefore, it is critical that the FCC approve the New MSA within days.

There is no reason to delay approval of the New MSA while the FCC disposes of Neustar's AFR. In any event, the AFR is now moot because the NAPM LLC and Telcordia Technologies, Inc. d/b/a/ iconectiv ("iconectiv") have filed a new version of the New MSA with far fewer redactions than the original filing contained. The remaining Highly Confidential portions of the New MSA relate to data security, and thus they must remain Highly Confidential in order to protect critical infrastructure. The remaining Confidential portions of the New MSA relate to issues that would compromise a potential rebid (e.g., pricing, and financial penalties). While the NAPM LLC is confident that the courts will reject Neustar's challenges to the bidding process, the NAPM LLC must protect the integrity of the bidding process until the conclusion of any and all related legal proceedings. In addition to being moot, Neustar's AFR has no merit, as the NAPM LLC and Telcordia explained in their respective Oppositions dated April 25, 2016.<sup>1</sup>

Please let me know if you have any questions or would like additional information about any of these issues.

Sincerely,



Todd D. Daubert  
*Counsel to the NAPM LLC*

cc: Diane Cornell                      Kris Monteith  
Rebekah Goodheart                Debra Jordan  
Travis Litman                        Michele Ellison  
Amy Bender                            Ann Stevens  
Nicholas Degani                      Sanford Williams

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<sup>1</sup> See Letter from Todd D. Daubert, Counsel, The NAPM LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116 (filed Apr. 25, 2016) (opposing Neustar's Application for Review as moot and meritless); Letter from John T. Nakahata, Counsel, Telcordia, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 07-149 & 09-109, CC Docket No. 95-116 (filed Apr. 25, 2016)(same).