

5/4/2016

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Marlene H. Dortch
Secretary
Federal Communications Commission
TW-A325
445 12th Street SW
Washington, DC 20554

Re: Ex Parte Presentation
CC Docket No. 09-109
07-149
95-116

Dear Ms. Dortch:

On May 2, 2016, I sent an e-mail to Diane Cornell, Special Counsel, Office of Chairman Tom Wheeler. The e-mail is in reference to the docket's cited above. A copy of the e-mail is attached.

I request that this letter, which is filed electronically, be placed in the file for the above-captioned proceeding.

Please contact me at 888-216-5784 with any questions.

Sincerely,



Aelea Christofferson

CC: D. Cornell

Aelea Christofferson

From: Aelea Christofferson
Sent: Monday, May 02, 2016 12:38 PM
To: 'diane.cornell@fcc.gov'
Cc: 'david.redl@mail.house.gov'; 'BAKane@psc.dc.gov'; 'Marilyn Jones'
Subject: Stop the progress on the iConnectiv Agreement

"More competition would be better." Chairman Wheeler 5/6/16

Chairman Wheeler constantly speaks up for competition and the competitive telecom providers want to believe his support is there, but the FCC is about to make a decision that has so shut out the competitive industry that the fact that it is coming from the Chairman's office is astounding.

I just left a message for you, but since time seems to be an issue I wanted to send you an e-mail. I have also copied key people that I reached out to on this issue.

I am a member of the North American Numbering Council(NANC), the FCC committee that should be handling the transition from Neustar to iConnectiv. I say should because the committee has allowed the North American Portability LLC (NAPM,) a committee with a \$34,000 price tag for membership, to shut out the small and medium size carriers from this process. I have raised this issue at meetings and have sent e-mails, but they have fallen on deaf ears. I realize that Chairman Wheeler's office has been contacted by the LNP Alliance, but there are a lot of us that are not part of that group that are extremely concerned about this process. This contract will have major effects on us, but we have only been given information from NAPM which is not at all a transparent organization and the Transition Oversight Committee (TOM) which while well meaning, has not allowed any real influence from a huge part of the industry. Now I understand with the contract finally coming out the Chairman wants to rush this process through. There seems to be the idea that a fast conclusion is what the industry wants, but it appears in conversations I have had, only the FCC and the very largest companies represented in NAPM wants a fast conclusion.

The problem started when the original idea that the TOM would be overseen directly by the NANC was changed to report to NANC. From that time on, unless you wanted to buy influence with the \$34,000, you had none. The result was a small number of very large companies totally controlled this process. I don't mean to imply that this committee didn't attempt to act on behalf for the entire industry, but I know from 30-years in the industry, that companies of this size are unable to understand the needs of smaller companies. At the last NANC meeting I asked that the \$34,000 membership fee be reviewed and the temporary chair, Cary Hinton, made a comment to NAPM that they may need to rethink their membership requirements. I sent a suggestion to Chairman Kane of a couple of ways to balance this committee as NANC does other committees, but have not heard back. I was going to bring this up at the next NANC meeting, but since it is not until June 30, I fear it will be too late.

There are so many unanswered questions that having this contract completed without vetting by a much larger representation of the industry could result in great damage to the competitive telecom companies. These are key questions like why was iConnectiv not required to consider the all IP network in their contract as Neustar had it in their plan. There are major question of what costs will be handed down to the users of NPAC, questions posed on every TOM call, but ignored without ever a mention the question had been asked.

Competition needs Chairman Wheeler to show that his support for competition is not just for speeches. The Chairman needs to delay this process and insist that companies other than the handful that have been involved have a say before it is too late.

Finally, I was sincere when I asked on the message I left you if you wanted 30 more calls asking for a change in this process. I tried not to make it sound like a threat, but I can certainly make that happen, or given the rest of the week, I can send a letter with at least that many signatures. Whatever is necessary to ensure that this conversion doesn't harm competition, I stand ready to do.

Thank you for your time and I look forward to hearing from you.

Aelea Christofferson
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