



May 16, 2016

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Telephone Number Portability, et al.*
CC Docket No. 95-116; WC Docket Nos. 09-109 and 07-149

Dear Ms. Dortch:

CTIA urges the Commission to expeditiously approve the Master Service Agreement (MSA) between the North American Portability Management LLC (NAPM LLC) and Telcordia Technologies dba iconectiv (iconectiv) to bring all telecommunications industry members and consumers the benefits of more efficient and effective Local Number Portability administration.

The process that is being followed, whereby the NAPM LLC negotiated a final MSA with iconectiv to implement the pricing and other terms previously approved by the Commission, was adopted in a public notice and comment rulemaking proceeding.¹ All parties – including those who now assert that the Commission should provide an extended period for public comment and freer access to detailed documents regarding the MSA negotiation process² – had the opportunity to participate in that rulemaking, as well as in the related proceedings within the North American Numbering Council (NANC).

CTIA believes expedited FCC approval of the MSA is necessary to ensure that consumers will reap the benefits of transitioning LNP administration to the new pricing structure that the Commission has approved. In addition, CTIA's

¹ *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration, et al.*, WC Docket No. 07-149 *et al.*, Order, 30 FCC Rcd 3082 (2015) ("*LNPA Selection Order*").

² *See, e.g.*, Letter from James Falvey, counsel to the LNP Alliance, CC Docket No. 95-116 *et al.* (filed May 6, 2016); Letter from Michael Romano, NTCA, CC Docket No. 950116 *et al.* (filed May 5, 2016); Letter from Thomas Navin and Aaron Panner, counsel to Neustar (filed May 2, 2016).



member companies spanning the wireless ecosystem will benefit from the substantial cost reduction and improved data management under the MSA.³

CTIA believes the MSA has been developed consistent with the Commission's Order, interested stakeholders have had opportunities to review and provide input to the MSA and further delay to the LNPA transition will not benefit any stakeholders. For these reasons, CTIA strongly urges the Commission to approve the MSA expeditiously and allow the LNPA transition process to proceed without further delay.

Sincerely,

/s/ Scott Bergmann

Scott Bergmann
Vice President
Regulatory Affairs

cc: Diane Cornell
Rebekah Goodheart
Travis Litman
Amy Bender
Nicholas Degani
Kris Monteith
Debra Jordan
Michele Ellison
Ann Stevens
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³ See, e.g., *LNPA Selection Order*, 30 FCC Rcd at 3127 ¶ 98 (new LNPA contract calls for security and validation elements for law enforcement access not included in original LNPA contract).