



**Jeffrey S. Lanning**  
Vice President - Federal Regulatory Affairs  
1099 New York Avenue NW  
Suite 250  
Washington, DC 20001  
202.429.3113  
jeffrey.s.lanning@centurylink.com

EX PARTE NOTICE

May 20, 2016

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

Re: *Local Number Portability, et al.*, CC Docket 95-116, WC Docket 07-149, WC Docket 09-109

Dear Ms. Dortch:

On May 20, 2016, the undersigned met separately with Diane Cornell, Special Counsel to Chairman Wheeler, and Travis Litman, Senior Legal Advisor to Commissioner Rosenworcel, to discuss the Master Services Agreement (MSA) between the North American Portability Management, LLC (NAPM) and Telcordia Technologies d/b/a iconectiv, which is under consideration by the Commission in the above-captioned dockets. On May 17, 2016, the undersigned met separately with Rebekah Goodheart, Legal Advisor to Commissioner Clyburn, and Nicholas Degai, Legal Advisor to Commission Pai, and discussed the same issues in the same dockets. The discussion in the meetings covered the following points.

The MSA is an agreement between the future local number portability administrator, in this case iconectiv, and the NAPM, which is the entity directed by the Commission to oversee the local number portability administrator. There are no other parties to the agreement and, when it goes into effect, the MSA will govern the actions of the parties in much the same way that a similar agreement has governed the relationship between the NAPM and Neustar, the current administrator. There will be no other parties to the MSA. Instead, providers will subsequently enter into their own agreements with the administrator, or a service bureau that handles such a relationship for multiple, smaller providers. If approval of the MSA is delayed, however, the Commission-approved transition from Neustar to iconectiv may also be delayed, which will end up costing consumers many millions of dollars for each month of delay.

Ms. Marlene H. Dortch  
May 20, 2016

Page 2 of 2

Several parties to this proceeding, particularly Neustar and the LNP Alliance, have raised various issues they claim are related to the Commission's consideration of the MSA and argued that the Commission should delay approval of the MSA. All of the issues raised, however, are clearly separable from the sole question before the Commission at this time—whether the MSA is an appropriate representation of the respective rights and responsibilities of the NAPM and iconectiv in its role as the local numbering portability administrator. Accordingly, the Commission should not move forward promptly in its consideration and approve the MSA. To do otherwise, would have the effect of holding consumer hostage while objecting parties pursue issues that can and should be addressed separately, if at all.

Several of the objections to approval of the MSA that have been raised in the record can also be rejected on the merits.

- There is no credible reason to think that the transition from Neustar to iconectiv as the local number portability administrator is likely to cost providers of any size or type. To the contrary, it is abundantly clear from the record that this transition is going produce major savings for providers and their customers.
- Whatever issues one may have with the process and transparency of numbering administration that the Commission has overseen for nearly two decades, there is no basis to conclude that the system is biased. All providers have had full opportunity for participation to date. Moreover, any party continues to have the right to petition for, and pursue changes to, the process through appropriate procedures.
- Finally, the LNP Alliance suggests that the transition from Neustar to iconectiv is an appropriate time to make changes to numbering administration in order to facilitate the IP transition. Nothing could be further from the truth. It is well understood that multiple complex system changes should not be undertaken simultaneously as doing so introduces additional risk and unforeseeable error. Therefore, the administrator transition must be completed before modifications to numbering databases and systems can be considered in connection with the IP Transition. Accordingly, delaying consideration of the MSA will have the effect of delaying, not facilitating, the IP Transition.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey A. Lanzetta". The signature is fluid and cursive, with a horizontal line at the end.

Copies via email to: Diane Cornell, Travis Litman, Rebekah Goodheart, and Nicholas Degani