

November 22, 2004

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

RE: Ex Parte Filing in WC Docket No. 04-313 and CC Docket No. 01-338

Dear Ms. Dortch:

NeuStar, Inc., in its role as the neutral third party Local Number Portability Administrator (LNPA) and operator of the Number Portability Administration Center (NPAC), submits this filing in the above-captioned docket regarding the NPAC's readiness to port numbers related to the migration of a customer's loop from an incumbent local exchange carrier's (ILEC) switch to the competitive local exchange carrier's (CLEC) switch. Specifically, NeuStar addresses assertions made in the record regarding the capacity of the NPAC to process the large number of ports that may be generated daily as a result of hot cuts from an ILEC switch under unbundled network elements platform (UNE-P) to a CLEC switch utilizing unbundled loops (UNE-L).

NeuStar submits this filing in response to statements contained in a filing from MCI in the above-captioned docket.¹ In its filing, MCI attempts to raise questions about the operation of the NPAC. Since MCI made similar assertions in its filing before the Public Utilities Commission (PUC) of California,² NeuStar attaches to this letter its comments submitted to the California PUC in response to earlier MCI assertions.

Overall, the central point made by NeuStar in its California filing and reiterated here is that NeuStar's NPAC system has an established track record of meeting multiple market and regulation based challenges that have significantly increased volumes. Most recently, NeuStar met the challenge involved with implementation of wireless local

¹ Declaration of Sherry Lichtenberg on behalf of MCI, Inc., filed September 30, 2004 (WC Docket No. 04-313 and CC Docket No. 01-338) (the "MCI Declaration").

² Joint Reply Testimony of Sherry Lichtenberg and Michael Starkey (public version) on behalf of MCImetro Access Transmission Services, LLC, MCI WorldCom Communications, Inc. at p. 30, lines 1-12, filed Jan. 15, 2004 in *Order Instituting Rulemaking on the Commission's Own Motion into Competition for Local Exchange Service* (Rulemaking 95-04-043), *Order Instituting Investigation on the Commission's Own Motion into Competition for Local Exchange Service* (Investigation 95-04-044).

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number portability and pooling. As discussed in detail in the attachment, the NPAC has more than enough capacity to handle even the worst-case scenario numbers envisioned for migration of numbers from UNE-P to UNE-L. Further, NeuStar thoroughly evaluates its systems on a yearly basis and monitors performance daily and will continue to do so. NeuStar's systems are engineered to exceed 99.9 percent availability. Year-to-date, NeuStar's NPAC has been operational and available 99.97% of the time. NeuStar's exceptional performance standards demonstrate its commitment to continue to meet the needs of industry and regulators at only the highest level.

As discussed in detail in the attachment, NeuStar remains confident it can handle increased volumes that may occur due to potential changes in the regulatory environment. NeuStar remains willing and eager to discuss any concerns any parties or the FCC might have about the management of the NPAC and its ability to manage escalated volumes of ported telephone numbers.

In accordance with the Commission's rules, one electronic copy of this letter is being submitted via the Commission's Electronic Comment Filing System for inclusion in the public record of the above-referenced proceeding. If you have any questions concerning this matter, please contact the undersigned at 202-533-2913.

Respectfully submitted,

\\s\ Mindy J. Ginsburg
Mindy J. Ginsburg
Director, Government Relations and Public Policy
NeuStar, Inc.