Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
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The Petition of Telcordia Technologies, Inc. To Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration	)	WC Docket No. 07-149
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REPLY COMMENTS OF VERIZON[1]

The Commission should deny Telcordia's request to revise certain terms in Amendment 57 of NAPM LLC's ("LLC") contract with NeuStar for the provision of number portability services.[2]

As both the LLC and NeuStar explain,[3] the terms at issue were negotiated at arms length by sophisticated parties and are included in a private commercial agreement. That Telcordia may disagree with the negotiated contract terms does not mean that the Commission should interject itself into what is at most a commercial dispute. While the Commission has required that carriers provide number portability, the commercial arrangements that the carriers or their representative enter into to meet those obligations are not and should not be regulated.

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[1] The Verizon companies participating in this filing ("Verizon") are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

[2] Petition of Telcordia Technologies, WC Docket No. 07-149 (June 13, 2007) ("Telcordia Pet.").

[3] *See* Comments of the North American Portability Management LLC (Aug. 22, 2007) ("LLC Comments") at 1; Opposition of NeuStar, Inc. (Aug. 22, 2007) at 1.

To be sure, Verizon agrees that competition among potential vendors is beneficial.[4] As the ultimate consumers of number portability services, Verizon and the other carriers that comprise the LLC have every incentive to ensure (i) that the prices are as low as possible without compromising the quality of those services and (ii) that number portability service providers continually innovate to improve services while further lowering costs. If Telcordia or other potential vendors believe that they can offer prices and quality levels that would make it worthwhile for the LLC to change vendors, they should present their proposals to the LLC.[5] The LLC has formally stated that it "has given, and even now after Amendment 57 remains open to give, serious consideration to all prospective vendors," LLC Comments at 4, and has explained that it consistently *refused* to agree to exclusive arrangements, *id.* at 31. Since carriers will need to procure number porting services for the foreseeable future, it would be short-sighted and irrational for the LLC to refuse to consider superior offers merely because Amendment 57 provides that the prices paid by the LLC would return to prior levels during any transition period to a new supplier.

Accordingly, Telcordia's petition should be denied.

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[4] *See, e.g.*, Telcordia Pet. at 14 ("[C]ompetition ensures that the industry, and thus consumers, gets the best service for the best price for number portability."); Comments of 60 Plus Association (Aug. 22, 2007); Comments of Science Applications International Corporation (Aug. 22, 2007) .

[5] A formal request for proposals is unnecessary since as the LLC explains, all material information required for a vendor's proposal, including NeuStar's prices, is available in the public domain. *See* LLC Comments at 20-21.

Respectfully submitted,

By: _____

Karen Zacharia
Mark J. Montano
VERIZON
1515 N. Courthouse Road
Suite 500
Arlington, VA 22201-2909
703.351.3058

Counsel for Verizon

Of Counsel
Michael E. Glover

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