

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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

**REPLY COMMENTS OF  
SPRINT NEXTEL CORPORATION**

Sprint Nextel Corporation (“Sprint Nextel”) hereby submits the following reply to comments on the Petition of Telcordia Technologies, Inc. (“Telcordia”) to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration (“Telcordia Petition”).<sup>1</sup>

Sprint Nextel urges the Federal Communications Commission (“FCC”) to reject the Telcordia Petition. As a member of the North America Portability Management LLC (“NAPM LLC”) and a party to the most recent negotiations that resulted in Amendment 57, Sprint Nextel concurs with the comments submitted by AT&T Inc. (“AT&T”), NeuStar, Inc. (“NeuStar”), and the NAPM LLC.<sup>2</sup> As detailed in their comments, the contract is lawful,<sup>3</sup> it was negotiated at arms-length after Telcordia was provided an

---

<sup>1</sup> 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 (June 13, 2007) (“Telcordia Petition”). See, FCC Public Notice, *Wireline Competition Bureau Seeks Comment on Telcordia Technologies, Inc.’s Petition Regarding Number Portability Administration Services*, WC Docket No. 07-149, DA 07-3380 (July 23, 2007).

<sup>2</sup> See generally, Comments of AT&T Inc. (Aug. 22, 2007) (“AT&T Comments”), Comments of NeuStar, Inc. (Aug. 22, 2007) (“NeuStar Comments”), and Comments of The North American Portability Management LLC (Aug 22, 2007) (“NAPM LLC Comments”).

<sup>3</sup> See, NeuStar Comments at pp. 16-26.

opportunity to provide the NAPM LLC with a competitive solution,<sup>4</sup> and, ultimately, it results in a considerable reduction in the per-port transaction fee to the benefit of telecommunications carriers and their customers. Simply stated, Telcordia mischaracterizes Amendment 57 and the contract negotiation between NeuStar and the NAPM LLC.

Sprint Nextel has a long, proud history before the Commission of supporting policies that promote competition. For this reason, Sprint Nextel is particularly troubled by Telcordia's strongly-worded, yet baseless allegations that the NeuStar – NAPM LLC contract is “anti-competitive” and a “devil’s bargain.”<sup>5</sup> To begin with, as detailed in comments submitted by the NAPM LLC, Telcordia had every opportunity to submit a proposal for consideration by the NAPM LLC, but it failed to make a “detailed proposal with technical or financial specificity.”<sup>6</sup> Moreover, Telcordia failed to provide the NAPM LLC with “evidence of its qualifications as a Neutral Third Party.”<sup>7</sup> The NAPM LLC “stood ready” to negotiate, in earnest, with Telcordia, but Telcordia failed to deliver at the bargaining table. As a result, the NAPM LLC moved on and began to re-negotiate with NeuStar.

Furthermore, Amendment 57 does not prohibit the NAPM LLC from considering proposals from other parties including Telcordia. As stated by AT&T, “NAPM’s receipt and review of an *unsolicited* proposal does *not* trigger *any* revision in prices unless and until such a proposal is officially accepted or approved by NAPM.”<sup>8</sup> In short, the NAPM

---

<sup>4</sup> See, NAPM LLC Comments at pp. 13-16 (demonstrating that Telcordia was given multiple opportunities to provide NAPM LLC with a proposal for NPAC/SMS services.); see also, AT&T Comments at p. 6 and NeuStar Comments at pp. 10-11.

<sup>5</sup> See, Telcordia Petition at p. 3 and p. 22.

<sup>6</sup> NAPM LLC Comments at p. 13.

<sup>7</sup> NAPM LLC Comments at pp. 13-14.

<sup>8</sup> AT&T Comments at p. 4.

LLC is free to consider any proposal from Telcordia at any time. Reality is far different from the restrictive, “devil’s bargain” picture Telcordia paints in its Petition.

Finally, with respect to the comments of the 60 Plus Association and Science Applications International Corporation (“SAIC”), the NAPM LLC has delivered 70% pricing reductions over the last decade and fully supports these organizations’ goals – real savings for real people, not theoretical savings promised, without any detail, by Telcordia. SAIC correctly asserts, “consumers pay the price if the telecommunications industry has agreed to pay too much for these services.”<sup>9</sup> And, the 60 Plus Association rightly seeks to protect its constituency, stating “[n]o one could use lower fees on their phone bill more than senior citizens.”<sup>10</sup> With intense price pressure in the highly-competitive consumer telecommunications marketplace, Sprint Nextel is very sensitive to the rates paid by its subscribers. One of the most effective ways to control/reduce the subscriber rates is to control/reduce operational costs.

Sprint Nextel and other telecommunications carriers, therefore, have every incentive to keep their portability costs to a minimum while ensuring that number portability functions at a high level. Thus, in response to the comments submitted by the 60 Plus Association and SAIC – make no mistake – the driving force behind the recent renegotiation of the NeuStar – NAPM LLC contract was *to lower the per-port transaction cost*. And, the NAPM LLC succeeded in obtaining such reduction. As a result of Amendment 57, Sprint Nextel will now pay a lower per-port transaction fees. As recognized by SAIC and the 60 Plus Association, these lower costs ultimately inure to the benefit of telecommunications customers.

---

<sup>9</sup> Comments of SAIC at p. 1.

<sup>10</sup> Comments of the 60 Plus Association at p. 2.

In conclusion, Sprint Nextel fully supports the comments submitted by AT&T, NeuStar and the NAPM LLC. Telcordia's baseless allegations have been refuted and the relief it seeks in its Petition should be denied by the Commission.

Respectfully submitted,

**SPRINT NEXTEL CORPORATION**

*/s/ Laura H. Carter* \_\_\_\_\_

Laura H. Carter  
Vice President, Government Affairs  
SPRINT NEXTEL CORPORATION  
2001 Edmund Halley Drive  
Reston, VA 20191  
703-433-4143

Charles W. McKee  
Director, Government Affairs  
SPRINT NEXTEL CORPORATION  
2001 Edmund Halley Drive  
Reston, VA 20191  
703-433-3786

Scott R. Freiermuth  
Counsel, Government Affairs  
SPRINT NEXTEL CORPORATION  
6450 Sprint Parkway  
Overland Park, KS 66251  
913-315-8521

September 21, 2007