

January 6, 2009

Via ECFS

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

Re: *Local Number Portability (CC Docket No. 95-116)*

Dear Ms. Dortch:

On January 2, 2009, Syniverse Technologies filed a letter in this docket requesting a certification from the Commission regarding Syniverse's role in the wireless number portability process in the United States. The certification was requested in order to comply with a requirement in a Request for Proposal ("RFP") issued by the Government of India's Ministry of Communications & Information Technology (the "Ministry"). Syniverse now files the attached Declaration of Michael O'Brien, Syniverse's Senior Vice President – Business Development, which provides additional factual support for the certification requested in the January 2 letter.

Syniverse reiterates its request that if the Commission determines to issue any certification letters with respect to the Ministry's requirements in the RFP, it should issue such certifications to all entities bidding on the Ministry's RFP who have demonstrated their participation in the provision of wireless number portability in the United States.

Syniverse Declaration

Michael O'Brien hereby declares as follows, under penalty of perjury, under the laws of the United States of America:

1. I am Sr. Vice President of Business Development at Syniverse Technologies Inc. ("Syniverse"). I have been an employee of Syniverse for 20 years and have particular experience with Syniverse's number portability products and provision of number portability solutions in the United States of America (USA), Canada and around the world. I am filing this declaration to confirm that Syniverse is providing various Number Portability Solutions, both mobile and wireline, in the USA and Canada.

2. Overview of USA Number Portability and the Role of Syniverse's Products – Although Syniverse does not operate the Number Portability Administration Center (NPAC) in the USA, Syniverse's services and products play a significant role in the US Number Portability marketplace. Wireless Number Portability (WNP) in the USA is supported by a set of complex processes. It consists of a negotiation phase directly between two operators followed by a porting activation phase between the operator and the NPAC and a communication phase between the NPAC and all operators in each NPAC region. The negotiation phase is supported by operators' back end systems and an Inter-Carrier Communication (ICC) function within operator gateways that communicate with each other through a clearinghouse. The activation process is supported by a centralized NPAC and Service Order Activation System (SOA) function within an operator's gateway that communicates with the NPAC. Following this, the communication phase takes place between the NPAC and many operators to update each operator's local databases to ensure calls to the ported number are sent to the new service provider ("recipient provider") rather than the original or old service provider ("donor provider"). Syniverse provides a hosted Service Bureau solution that enables both inter-operator communications during the negotiation phase and communications to the NPAC during the activation phase. Indeed, as the Service Bureau of record for the vast majority of mobile operators Syniverse is involved in at least 90% of ports between mobile operators. Syniverse also provides a hosted Clearinghouse solution for operators who manage their own Service Order Activation platform. Finally, Syniverse also provides a hosted shared solution for receiving updates on ported numbers for all NPAC regions from the NPAC and thereby enables mobile operators to send SS7 and SIP-based queries to our NP database to support proper routing of calls and messages. No other provider is involved in all three phases of number portability.

3. The bi-lateral nature of the negotiation phase process is what sets the USA and Canada apart from most other countries when it comes to implementing number portability. Operator Gateways (Inter Carrier Communications functions) connect with each other, typically via a centralized and managed clearinghouse, outside of the NPAC in order to complete the porting process. During the negotiation phase of the porting process, operators initiate their own port requests and respond to other operators' port requests, and then either approve or return them for further clarification or correction. Once approved, Operator Gateways (SOA functions) interact with the NPAC to finalize the pre-port process to prevent fraudulent ports and then proceed to provision and activate the ported numbers. Again, this is a role Syniverse provides for the vast majority of US operators. This separation of the bi-lateral negotiation phase from the activation process at the central database dictates a need for complex Operator Gateways that connect with each other for pre-port initiation and connect with the NPAC for activation of ports. Syniverse simplifies this greatly by operating a service bureau and clearinghouse between operators.

4. Syniverse operates and manages services that provide ICC and SOA functions to USA and Canadian operators. In playing such a role we facilitate and provide networking capabilities that allow an operator to integrate its Operations Support System (OSS) infrastructure into the porting processes. This means that Syniverse plays a significant role in USA number porting because the wireless companies that utilize Syniverse services and products account for 90% of wireless porting in the USA annually.

5. For fixed line number portability, Syniverse operates and manages a service bureau model for operators who prefer to outsource their local number portability (LNP) operations. Our Service facilitates automated communications with those fixed operators that support such interfaces, and we also provide services to update intermodal (between fixed and mobile) port requests and responses from operators who support only fax, e-mailed documents or other methods by entering these records into the same Service Bureau solution used for mobile-to-mobile porting. Thus Syniverse provides what no other number portability service provider does – a single model for porting between mobile operators and other mobile or fixed operators.

6. Portability Transactions in the USA: As of November 2007, the mobile subscriber base in the USA was 259.2 million subscribers. (Source: Cellular Telephone and Internet Association ("CTIA") web site).

7. As of November 2008, 49,882,801 port orders have been processed by Syniverse since November, 2003. (Source: Syniverse).

8. Syniverse supports the six largest mobile operators in the US as either customers of our Service Bureau ICC/SOA (Negotiation and Activation phases) or Clearinghouse ICC function only (negotiation phase only). These six mobile operators and approximately 90 other mobile operators account for over 90% of the wireless porting activity annually in the USA. The Syniverse Service Bureau and Clearinghouse has been in use by most of these US companies since WNP began in the USA in November 2003. A few operators who started in November 2003 with a rival Service Bureau or Clearinghouse have since converted to Syniverse. Today, Syniverse is utilized by these nearly 100 operators for all of their porting activity during the Negotiation phase.

9. Syniverse also supports all but two operators for communications with the NPAC. As such we are involved in the majority of porting messages between the NPAC and mobile operators.

10. Syniverse also supports many mobile and fixed operators by providing a 3rd party hosted database of ported numbers which operators may query via SS7, SIP or XML-based queries to determine the current operator providing service to a ported number. This enables calls to these numbers to be delivered by the originating network to the correct terminating network without impact to the calling or called party.

Signed:



Michael O'Brien
Sr. Vice President – Business Development
Syniverse Technologies, Inc.

Executed on: 05 January 2009 (Date)