

May 19, 2009

By electronic filing:

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Ex Parte Presentation, WC Docket No. 07-149

Dear Ms. Dortch:

On May 19, the undersigned and Michael O'Connor of NeuStar met with Julie Veach, Acting Bureau Chief, Wireline Competition Bureau, and Ann Stevens, Deputy Chief, Competition Policy Division to express NeuStar's opposition to the request for an interim standstill order submitted by Telcordia Technologies, Inc. ("Telcordia") on May 18. As an initial matter, rather than filing a petition for declaratory ruling, Telcordia styles its request for extraordinary relief as a "Request for Interim Standstill" and allows interested parties only one day's notice to respond notwithstanding that the industry has been considering these issues for a number of years. Even if the Commission determines to reach the merits of the request, Telcordia's request should be rejected because, in spite of Telcordia's contentions to the contrary, there is no irreversible harm that would come from any action by the North American Portability Management, LLC ("NAPM").

In its filing, Telcordia seeks to prevent the North American Portability Management, LLC ("NAPM") from considering a statement of work that would amend its number portability agreements with NeuStar to add Uniform Resource Indicator ("URI") capability. In support of its request, Telcordia asserts that a standstill directive is necessary "to prevent the NAPM from acting unilaterally" to add these fields. Telcordia further asserts that the unusual measure of standstill is needed because, once NAPM authorizes NeuStar to populate the URI fields, a subsequent decision by the Commission that such URIs are inappropriate would render void Amendment 70 of the Master Agreement between NeuStar and the NAPM.

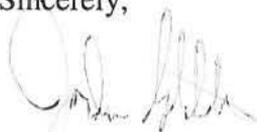
In its meeting, NeuStar argued that the Commission should not be swayed by either of these arguments. Amendment 70 to the Master Agreement, which was entered into by NeuStar and the NAPM for the purpose of providing new pricing terms for number portability services, does *not* authorize URI fields and instead, treats them only as a contingency. Amendment 70 contemplates that authorization to include URI fields in the NPAC could be made through one or more future amendments to or statements of

work (“SOW”) under NeuStar’s number portability agreements. Moreover, the SOW to add URI fields to the NPAC is constructed in a manner that, should the FCC reverse its decision to allow the industry to consider these specific fields and determine that these fields should not be included in the NPAC, NeuStar would remove such fields at no cost to the industry. The severability provision of Amendment 70 cited by Telcordia simply has no bearing on any amendment under consideration by the NAPM to add URI fields to the NPAC. Because the URI fields can be unwound if necessary without adverse financial cost to the industry, there is no reason for the Commission to intervene in the ongoing industry processes.

Further, contrary to the assertion by Telcordia, the NAPM has not acted unilaterally in its consideration of URIs in the NPAC. The industry has been examining this issue for a number of years. In 2004, NANC’s Local Number Portability Administration (“LNPA”) Working Group began consideration of Change Order 400, which proposed adding four URI fields to the NPAC. In 2005, the Commission directed that this change order be held in abeyance. In a February 4, 2008 letter, the Chief of the Wireline Competition Bureau informed the NANC Chair that the “industry could reconsider Change Order 400 rather than continue to hold in abeyance its consideration.” With the abeyance directive removed, the industry, through the NANC’s LNPA Working Group, began examining these issues once again. Early this year, the LNPA Working Group reached consensus that three of the URI fields should be forwarded to the NAPM for consideration for inclusion in the NPAC. In short, there has been extensive industry review of the URIs in the NPAC and there is no basis for the Commission to intervene with the extraordinary relief requested by Telcordia.

As there is no harm to NPAC users if the NAPM goes forward with its consideration of URIs in NPAC and as there has already been extensive industry consideration of this issue, including by the NANC’s LNPA Working Group, we urged the Commission to reject Telcordia’s request.

Sincerely,



Jordan Goldstein  
Vice President  
Federal Regulatory

cc: Julie Veach  
Ann Stevens  
John Nakahata  
Thomas Koutsky  
Dan A. Sciullo  
Jennifer Schneider  
Mark Stone  
Nicholas Alexander