



18 June 2009

Ms. Julie Veach  
Acting Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Comment on request filed by Telcordia Technologies, Inc, dated 22 May 2009, WC Docket 07-149

Dear Ms Veach:

Evolving Systems, Inc. ("Evolving Systems") is one of several software vendors providing carrier-level number portability OSS systems to US service providers. As such, we have been closely involved with developments in the area of number portability in the US since its inception. We have watched with interest as Neustar has promoted the value of driving increasing transaction rates through the NPAC RSMS, including number pooling, adoption of the URI fields, and advocating the use of NPAC to provide carriers with a reliable alternative for rehomeing portions of their assigned codes to new network elements. Evolving Systems wishes to share its concern that the US telecommunications market is becoming increasingly reliant on a sole-sourced clearing system. We believe that the industry as a whole, individual operators, and by extension, telecommunications consumers would reap substantial benefits from the re-introduction of competition into the NPAC clearinghouse environment.

The prospect of introducing a peered NPAC model, supportive of competitive offerings, is currently being evaluated by the LNPA WG Architectural Planning Team. We support any efforts by the Commission to encourage this effort, and to direct the NAPM LLC to establish a contractual structure supportive of such a competitive environment.

Further, with respect to the addition of URI fields per Amendment 72 of the Neustar contract with NAPM LLC, we are supportive of the proposal to allow NANC time to review the appropriateness of these URI fields prior to moving forward with this initiative.

Evolving Systems would welcome the opportunity to discuss this situation further with you, as appropriate.

Respectfully,

Steve Farnsworth  
VP Number Management Solutions  
Evolving Systems, Inc.