

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telcordia Petition To Reform Or Strike)	WC Docket No. 09-109
Amendment 70, To Institute Competitive)	
Bidding For Number Portability)	
Administration, And To End The NAPM)	DA 09-1762
LLC's Interim Role In Number Portability)	
Administration Contract Management)	
)	

**REPLY COMMENTS
of the
ORGANIZATION FOR THE PROMOTION AND
ADVANCEMENT OF SMALL TELECOMMUNICATIONS COMPANIES**

I. INTRODUCTION

The Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) hereby submits these reply comments in response to the Public Notice issued in the above-captioned proceeding.¹ OPASTCO is a national trade association representing approximately 520 small incumbent local exchange carriers (ILECs) serving rural areas of the United States. Its members, which include both commercial companies and cooperatives, together serve more than 3.5 million customers. OPASTCO holds a seat on the North American Numbering Council (NANC) and actively participates in that body's deliberations. OPASTCO supports the position of the majority of the commenters in this proceeding that urge the Commission

¹ *Wireline Competition Bureau Seeks Comment On Telcordia Petition To Reform Or Strike Amendment 70, To Institute Competitive Bidding For Number Portability Administration, And To End The NAPM LLC's Interim Role In Number Portability Administration Contract Management*, WC Docket No. 09-109, Public Notice, 24 FCC Rcd 10271 (2009) (Public Notice).

to deny the petitioner's request to amend the current North American Portability Management contract.

II. THE TELCORDIA PETITION SHOULD BE DENIED BECAUSE IT FAILS TO SHOW A NEED TO ALTER THE CURRENT NUMBER PORTABILITY CONTRACT

The Public Notice seeks comment on a petition from Telcordia Technologies Inc. that asks the Commission to (1) direct the North American Portability Management, LLC (NAPM) not to execute Amendment 70 of the contract between the NAPM and the current Local Number Portability Administrator, NeutStar Inc., (2) initiate competitive bidding for number portability administration, and (3) end the NAPM's role in number portability administration contract management.² OPASTCO agrees with commenting parties from a variety of industry sectors that ask the Commission to deny this petition.³

Altering or striking Amendment 70 is not in the public interest. This provision provides both the wireline and wireless segments of the telecommunications industry with a cost effective method of routing calls that originate from the traditional public switched telephone network, as well as wireless networks, to be terminated on new Internet Protocol enabled networks without the need for additional database queries. This provision controls costs, while facilitating the ability of consumers to obtain service from the provider of their choice. Therefore, OPASTCO supports retention of Amendment 70.

Furthermore, the petition does not justify the institution of competitive bidding at this time for number portability administration, nor the cancellation of the NAPM's role in number portability administration and contract management. As AT&T noted in their comments, the petition "has not shown that NAPM has failed to appropriately oversee

² *Id.*, p. 1.

³ *See, e.g.*, comments of AT&T; CompTel; Sprint Nextel; Qwest; Verizon; and XO Communications.

Neustar or otherwise acted contrary to the Commission's vision for [Local Number Portability].”⁴ The petition does not show any benefits that would result from the adoption of its proposals. Nor does it demonstrate any notable operational deficiencies in the current administration of number portability. Accordingly, the petition should be denied.

III. CONCLUSION

The record in this proceeding does not demonstrate compelling reasons for the Commission to intervene at this point in number portability administration. Alteration of the current NAPM contract, in whole or in part, has not been shown to be necessary or desirable at this time. Therefore, the Commission should deny the petition.

Respectfully submitted,

**ORGANIZATION FOR THE
PROMOTION AND ADVANCEMENT OF
SMALL TELECOMMUNICATIONS COMPANIES**

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September 29, 2009

⁴ AT&T, p. 1.

CERTIFICATE OF SERVICE

I, Stephen Pastorkovich, hereby certify that a copy of the reply comments by the Organization for the Promotion and Advancement of Small Telecommunications Companies was sent via first-class postal mail, or via electronic mail, on this, the 29th day of September 2009, to those listed on the attached sheet.

By: /s/ Stephen Pastorkovich
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