

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

In the Matter of

Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute a Competitive Bidding for Number Portability Administration, and to End the NAPM LLC's Interim Role in Number Portability Administration Contract Management

WCB Docket No. 09-109

**REPLY COMMENTS OF
PAETEC COMMUNICATIONS, INC.**

PAETEC Communications, Inc. ("PAETEC"), by undersigned counsel, hereby submits these reply comments in opposition to the Petition of Telcordia Technologies, Inc. ("Telcordia") in the above-referenced proceeding.¹ PAETEC is a competitive local exchange carrier offering voice and data services to business-class customers in 42 states and the District of Columbia, encompassing 80 of the 100 largest metropolitan areas throughout the United States. PAETEC has a broadband network spanning over 19,000 local route miles, with 120 switching facilities that support traditional voice and Internet Protocol ("IP") capabilities.

PAETEC agrees with the comments of XO Communications ("XO") and COMPTTEL that IP routing information should be included in the Number Portability Administration Center ("NPAC") as provided for in Amendments 70 and 72 to NPAC

¹ *Petition of Telcordia Technologies, Inc. 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*, filed May 20, 2009.

contracts.² As both XO and COMPTTEL point out, IP routing information is necessary to route IP-based communications efficiently between and among providers whose networks are IP based.

PAETEC also agrees with XO that including IP routing information in the NPAC -- a database available on an equal basis to all service providers -- will enhance marketplace competition.³

Finally, PAETEC agrees that grant of the Telcordia petition could increase the cost of number portability to all carriers and slow the roll-out of new IP-based services that will benefit consumers and spur the demand for broadband.⁴

For these reasons, PAETEC urges the Commission to reject the Telcordia petition.

Respectfully submitted,

/s/ Ronald W. Del Sesto, Jr.

Ronald W. Del Sesto, Jr.
Bingham McCutchen LLP
2020 K Street, NW
Washington, DC 20006
(202) 373-6000 (Tel)
(202) 373-6001 (Fax)
r.delsesto@bingham.com

Counsel for PAETEC Communications, Inc.

Dated: September 29, 2009

² See *Comments of XO Communications, LLC*, WCB Docket 09-109, filed September 8, 2009 (“*XO Comments*”) at 2; and *Comments of COMPTTEL*, WCB Docket 09-109, filed September 8, 2009 at 1.

³ *XO Comments* at 2.

⁴ *XO Comments* at 3.