

December 16, 2010

**VIA ECFS**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**Re: Notice of Ex Parte Communication, WC Docket Nos. 07-149 & 09-109**

Dear Ms. Dortch:

On December 15, 2010, Mel Clay and Tim Decker, Co-Chairs of the North American Portability Management LLC ("NAPM LLC"), Gary Sacra, NAPM LLC, and I, outside counsel for the NAPM LLC, met with the Honorable Betty Ann Kane, Chairman, District of Columbia Public Service Commission, Cary Hinton, Management Analyst, District of Columbia Public Service Commission, Maureen Duignan, Office of General Counsel, and William Dever, Lisa Gelb, Marilyn Jones, Ann Stevens, and Sanford Williams, Wireline Competition Bureau, to discuss the best means for effectuating the oversight authority of the Federal Communications Commission ("FCC") and the North American Numbering Council ("NANC") while ensuring the integrity and confidentiality of the Request for Information/Request for Proposal process.

During the meeting, the NAPM LLC reiterated its position that: (1) the authority of the FCC and NANC to oversee the NAPM LLC's prosecution of the RFI/RFP process is not now, and has not ever been, in question; (2) the Communications Act of 1934, as amended, and the FCC's implementing regulations provide flexibility with respect to how oversight is implemented; (3) the integrity of the RFI/RFP process must be ensured through sufficient neutrality and confidentiality protections; and (4) any further delays in initiating the RFI/RFP process would create a serious risk that the current contract will have to be extended, particularly if a new vendor(s) is selected and/or the winning proposal requires the implementation of new systems/technology. Finally, the NAPM LLC expressed its opinion that the existing rules and delegations of authority provide ample authority for the NAPM LLC, as overseen by the FCC and the NANC, to begin the RFI/RFP process now even if the FCC chooses to take further action to clarify the authority and roles of the FCC, NANC and the NAPM LLC with respect to the selection of number portability Administrators, which the NAPM LLC would welcome. The attached letter from the NAPM LLC to Chairman Kane was also discussed during the meeting.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being filed via ECFS with your office. Please contact the undersigned if you have any questions or need additional information.

Sincerely,

/s/

Todd D. Daubert  
*Counsel for the NAPM LLC*

Enclosure