



September 15, 2011

Ex Parte

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

RE: Petition of Telcordia Technologies, Inc. to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration, and Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute a Competitive Bidding for Number Portability Administration, and to End the LLC's Interim Role in Number Portability Administration Contract Management, WC Docket Nos. 07-149 & 09-109

Telephone Number Portability, WC Docket No. 95-116

Dear Ms. Dortch:

Telcordia Technologies, Inc. is pleased to share with the Commission and the North American Numbering Council (“NANC”) the attached study released yesterday finding significant economic and information advantages for telecommunications carriers and consumers from having multiple regional providers of Number Portability Administration Center (NPAC) services. Conducted by Dr. William Rogerson, Professor of Economics at Northwestern University and former FCC Chief Economist, the study evaluates how the upcoming NPAC service procurement could be organized to allow for multiple regional providers and the costs and benefits of doing so.

Dr. Rogerson concludes that planners should not discount the potential magnitude of the price-reducing effects of increased competition. For example, in defense procurement, “it has been found that dual sourcing generally lowers prices by 20 percent, even though dual sourcing sacrifices some economies of scale.” As you know, costs of NPAC services are projected to reach \$500 million annually by 2015.

Dr. Rogerson compared sole-source procurement designs to multiple-source procurement designs, including flexible procurement design. Sole-source procurement enables a provider reduce its costs of production to the extent that there are economies of scale and scope. A multiple-source procurement to select multiple regional vendors, however, would yield four significant benefits: performance and price benchmarking, increased innovation, back-up

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capabilities in the event of technical or financial failure, and increased competition in future NPAC and related procurements.

A copy of this letter is being filed in the above-captioned dockets.

Sincerely,

/s/ John T. Nakahata

John T. Nakahata

Madeleine V. Findley

Counsel to Telcordia Technologies, Inc.

Attachment

cc: Sharon Gillett
Betty Ann Kane
Geoffrey Why
Deborah Blue
William Dever
Maureen Duignan
Lisa Gelb
Diane Griffin-Holland
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