

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Local Number Portability (LNP)	)	WC Docket No. 09-109
Administration ContractConnect America	)	WC Docket No. 07-149
Fund	)	CC Docket No. 95-116
	)	

**COMMENTS OF THE VERMONT PUBLIC SERVICE BOARD**

**I. INTRODUCTION**

On August 13, 2012, the Wireline Competition Bureau requested comments on the proposed Request for Proposal (RFP) for local number portability (LNP) database platforms and services and the associated Technical Requirements Document and Vendor Qualifications Surveys. The Vermont Public Service Board (VPSB) respectfully submits these comments in support of the efforts the North American Portability Management, LLC and the North American Numbering Council and the LNPA Selection Working Group to adopt provisions on vendor neutrality.

Section 4.2 of the LNPA RFP contains provisions that have the effect of requiring that a selected LNP Administrator not be a Telecommunications Carrier or be affiliated with one. The VPSB supports these provisions. It is essential that the numbering administration is performed in a way that is competitively neutral. All carriers should have the same right to have numbers ported within the appropriate time frames. These carriers should not be subject to different treatment because the numbering administrator has an interest in preferring one carrier over another. The absence of such neutrality will likely harm both consumers (who may not get their services ported in a timely manner) and competitors who cannot deliver services to their newly

acquired customers as quickly as other competitors. The neutrality provisions will ensure that any disparate treatment is the result of operational considerations, not an administrator favoring its affiliate or its own or its affiliates telecommunications interests. For these reasons, we recommend that the WCB adopt the neutrality provisions in the RFP.

Respectfully submitted,

/s/ John D. Burke  
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