

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

In the Matter of

*Administration of the North American  
Numbering Plan, and Number Resource  
Optimization*

WC Docket No. 92-237

WC Docket No. 99-200

**REPLY COMMENTS OF NEUSTAR, INC.**

Neustar, Inc. (“Neustar”) hereby submits the following Reply Comments in response to the Federal Communication Commission’s (“Commission” or “FCC”) Public Notice<sup>1</sup> on the North American Numbering Council (“NANC”) recommendation,<sup>2</sup> as proposed by its Numbering Oversight Working Group (“NOWG”),<sup>3</sup> that the FCC consider consolidating the North American Numbering Plan Administrator (“NANPA”) and Thousands-Block Number Pooling Administrator (“PA”) contracts.

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<sup>1</sup> *Comment Sought on North American Numbering Council Recommendation That the FCC Consolidate its North American Numbering Plan Administrator and Pooling Administrator Contracts*, Public Notice, WC Docket No. 92-237; WC Docket No. 99-200 (April 22, 2013).

<sup>2</sup> Letter from Betty Ann Kane, Chairman, NANC, to Julie A. Veach, Chief, Wireline Competition Bureau, Federal Communications Commission (February 20, 2013).

<sup>3</sup> Letter from Laura Dalton, Verizon Communications, Natalie McNamer, T-Mobile USA, Inc., and Karen Riepenkroger, Sprint Nextel, to Betty Ann Kane, Chairman, NANC (November 28, 2012) (“*NOWG Letter*”).

Neustar currently serves as the NANPA and PA under separate federal contracts with the FCC.<sup>4</sup> As the current NANPA and PA, Neustar is in a unique position to comment on how the consolidation of the NANPA and PA contracts will affect the efficient and impartial administration of the North American Numbering Plan (“NANP”).

Neustar has long supported and recognized the benefits to consolidating the NANPA and PA contracts. For example, in 2000, when the issue of a national PA was first being examined by the NANC, Neustar supported the incorporation of PA functionality into the NANPA organization based upon the similarities and synergies of the administrative responsibilities.<sup>5</sup> Further, the FCC stated in the *Number Resource Optimization Order*, “it may be desirable in the future to link the thousands-block number pooling administration and central office code administration duties to take advantage of any synergies that may exist between these functions.”<sup>6</sup> To the extent that the FCC, state regulators, and the industry determine that consolidation of these functions is beneficial, Neustar is supportive of that decision.

The focus of any plan for consolidation of the NANPA and PA functions should be achieving additional benefits for the public, the FCC, and the communications industry. As the NOWG recognized, the principal potential benefits of consolidation lie in realization of synergies and operational efficiencies, along with reduced administrative costs for service

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<sup>4</sup> Neustar has served as the NANPA since 1997 pursuant to an Order by the FCC. The FCC has recognized Neustar’s exceptional performance by twice awarding it new contracts through a competitive bidding process, most recently in 2012. Neustar has served as the PA since the first contract was awarded via competitive bidding process in 2001. The FCC also has recognized Neustar’s exceptional performance as the PA by renewing its contract competitively in 2007.

<sup>5</sup> See Letter from Cheryl A. Tritt, Counsel to Neustar, to Magalie Roman Salas, CC Docket No. 99-200; CC Docket No. 92-237 (March 9, 2000).

<sup>6</sup> *In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, FCC 00-104, CC Docket No. 99-200, para. 152 (March 31, 2000).

providers and for the responsible numbering administrator.<sup>7</sup> Moreover, as evidenced by the recent FCC Notice of Inquiry concerning the future of numbering, the communications environment is evolving with the transition to all IP-networks.<sup>8</sup> In that context, the demand for and utilization of numbering resources is expected to continue to be of significant and increasing relevance to service providers and consumers. Neustar believes that an incremental approach to the integration of NANPA and PA functions, which at the same time permits an assessment of the Commission's and the industry's long term needs, would reap material short-term and long-term benefits.

The NOWG also observed that an examination of both contracts with an eye toward the consolidation of the NANPA and PA responsibilities and functions may identify areas for improved operational efficiencies and reduced redundancy of certain functions.<sup>9</sup> Such an examination will permit the industry and the Commission to ensure that potential efficiencies can be attained without unintentionally sacrificing the needs of the industry. For example, as identified by several commenters, the concept of a single administrator may permit the further

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<sup>7</sup> See *NOWG Letter*. The NOWG also pointed out that the possibility of a somewhat expanded contract (as compared to the NANPA and PA contracts standing alone) may attract additional bidders by reducing the costs of responding to a potential RFP relative to the contract size. Neustar has faced competitive procurements for roles as both the NANPA and PA; the RFP process, in both cases, ensured that the industry and the FCC reaped the benefits of competition in the provision of both functions. Neustar has always sought to provide outstanding value to the industry and the FCC under both NANPA and PA contracts. Neustar's approach to a combined RFP would be no different.

<sup>8</sup> *Numbering Policies for Modern Communications*, WC Docket No. 13-97, *et al.*, Notice of Proposed Rulemaking, Order, and Notice of Inquiry, FCC 13-51 (April 18, 2013).

<sup>9</sup> See *NOWG Letter*.

reduction in processing time for submitted central office code and thousands-blocks applications by the NANPA and PA, from 14 calendar days to 7 calendar days.<sup>10</sup>

Neustar also believes that the Commission and the industry should fully consider the option of taking advantage of current system infrastructure, which could serve as the basis for an evolution towards a new system that provides the feature/functionality required by its users. The comments of iconectiv suggest that the design of a consolidated NANPA/PA should be driven primarily by the goal of making the proposed contract most attractive to potential bidders – as opposed to whether such a design provides any benefit to the system’s users.<sup>11</sup> iconectiv argues that allowing a potential bidder to build on existing systems in proposing a consolidated NANPA/PA system should be prohibited, instead arguing that entirely new systems and interfaces be required of bidders for the consolidated NANPA and PA system, so as not to provide any advantage to the incumbent.<sup>12</sup> It also argues that that the Commission should preclude additional requirements that may arise from the Commission’s Future of Numbering inquiry (for example, Individual Telephone Number pooling) from being procured as an extension of a combined NANPA/PA solution, on the grounds that doing so would unnecessarily favor the incumbent solution.<sup>13</sup>

The Commission should not preclude particular design considerations at this point in the process that may provide the optimal and cost-effective solution for itself and for service providers. Significantly, any bidder in a future procurement – not just the incumbent – may rely on existing FCC systems and interfaces in designing a next-generation proposal or an integrated

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<sup>10</sup> See Sprint Nextel Corporation, Verizon, Verizon Wireless, T-Mobile USA, Inc., AT&T Inc., and XO Communications Services, LLC Joint Letter at 1; Nebraska Public Service Commission Comments at 2.

<sup>11</sup> iconectiv Comments at 4

<sup>12</sup> *Id.* at 4.

<sup>13</sup> *Id.* at 5-6.

approach to new requirements, because those systems belong to the Commission and have been paid for – and built to the specifications of – the industry. Any bidder may seek to build on those systems, if that solution provides the most benefit to users of the system, or propose a new system. Regardless, the primary guiding principle in the Commission’s oversight should be creating benefit for the public, industry and the Commission, not merely creating competitive opportunity for a single vendor.

As part of its evaluation of the future needs of the communications industry, in addition to examining the possible consolidation of the NANPA and PA functions, the Commission should also consider the appropriate path forward for the Business Integrated Routing & Rating Database System (“BIRRDS”), the LERG Routing Guide (“LERG”), and the system for the assignment of Common Language Location Information Codes (“CLLI Codes”), which all are part of the same industry ecosystem that is in the process of evolving to IP networks. For example, the maximum of 14 days it may currently take for a code assignment pales in comparison to the up to 66 days it takes for a code to become effective after assignment due to the need to input assignment information into BIRRDS and to have that information distributed in the form of the LERG. The technical limitations associated with BIRRDS and its output (*i.e.*, the LERG) may constrain efforts to implement a more efficient numbering system, particularly as the Commission strives to accommodate the transition to IP. Neustar respectfully requests that the Commission therefore address whether, and how, to integrate these functions along with the NANPA and PA functions in any consolidation. The Commission should also consider whether the BIRRDS, LERG and CLLI Code offerings should be subject to the same neutral administration requirements as the NANPA and PA.

## CONCLUSION

Neustar has long recognized the potential benefits to consolidating the NANPA and PA contracts. To the extent that the FCC, state regulators, and the industry determine that consolidation of these functions is beneficial, Neustar is supportive and stands ready to assist the FCC and the industry.

Respectfully,



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