



February 25, 2014

VIA EMAIL AND ECFS

Ms. Julie Veach
julie.veach@fcc.gov
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* CC Docket No. 95-116; WC Docket No. 09-109

Dear Ms. Veach:

I am writing on behalf of certain members (listed below) of the Midwest Association of Competitive Communications (MACC) to request the Commission and the NANC take into consideration the specific impact that the selection of the local numbering portability administrator could have on my member companies. MACC's membership includes competitive local exchange carriers operating in the Midwest states of Kansas, Missouri, Arkansas, Oklahoma, Illinois, Indiana, Ohio, Wisconsin and Michigan and those members of MACC who join me in this letter include Birch Communications, Cbeyond, Earthlink, First Communications, MegaPath, Socket, TDS Metrocom, and tw telecom.

MACC's competitive carriers depend on a seamless number portability system to acquire customers and maintain networks. Any disruption to number portability will harm both the customers that my members are trying to move onto their networks and existing customers. In addition, certain members and similar providers primarily serve small- and medium-sized businesses. Any disruption of service to these customers would negatively affect the U.S. economy because these businesses are its driving force.

We are concerned that the selection process for a new portability vendor may not have adequately included consideration of issues that are of high importance and significance to the MACC companies listed below. We understand that the North American Portability Management LLC has been engaged in the vendor selection process, and that group has a few CLECs or cable companies at the table, but in large part that group is dominated by large carriers with very different interests than companies like our members. What might be considered a minor transition cost could be very significant to a smaller carrier. Hence, we urge you to implement a process to ensure that of the thousands of providers that depend on number

portability as a core component of their business have input and the opportunity to voice concerns.

Small- and medium-sized businesses rely heavily on their communication services and providers for reliable and dependable service; at a time when our economy is struggling, the potential risks of switching NPAC vendors must be seriously considered and evaluated against perceived benefits of making such a change before any proposed action is taken.

We have a number of proposals that we urge the Commission and the NANC to consider.

1. We would like to be assured that those engaged in the selection process have obtained the most competitive bids possible.
2. Before any recommendation on selection is made to the Commission, we would like the opportunity to review and comment upon any analysis that was done regarding the impact of this selection process on smaller carriers and their customers.
3. If a change in vendors is recommended, we would like assurance that there will be no disruption to our members' business operations.
4. Finally, if a change in vendors results in a savings on dips or other administrative costs, we would like to see the analysis that those cost reductions offset transition costs that will be incurred by, and absorbed by, service providers.

Respectfully submitted,

/s/ Pamela H. Hollick
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cc: The Honorable Betty Ann Kane
Via email: Bakane@psc.dc.gov

MACC Members Joining:

Cbeyond
Earthlink
First Communications
MegaPath
Socket
TDS Metrocom
tw telecom