

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

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

Dear Ms. Veach:

I am the Executive Director of FISPAs, the HOW TO association of CLECs and service providers. Founded in 1996, FISPAs continues to provide leadership in helping small- and mid-sized CLECs and Service Providers compete against and work with incumbent carriers to ensure a better business model to increase our members' probability for success. FISPAs' current membership tallies over 200 companies.

We noticed the recent letters filed by COMPTTEL, MITA and TEXALTEL regarding the selection process for the local number portability administrator. Like those associations, FISPAs is concerned that smaller CLECs and service providers have been unrepresented in the selection process. We are concerned there has not been a thorough analysis of the impact that a transition to a new LNPA vendor might have on smaller carriers, who can ill afford either the cost of a transition or the possibility of portability service disruptions. If such an analysis has been made, all service providers should have the right to review and comment on it before a recommendation is made to the Federal Communications Commission (FCC) by the North American Numbering Council (NANC) or a selection is made by the FCC. In addition, the FCC and the NANC should protect the public interest by ensuring that the process employed has resulted in the most competitive bids possible from all prospective vendors.

Without local number portability, competition in the local telecommunications marketplace cannot exist. It would be tragic if the selection of a local number portability administrator would have a negative impact on the very competition it is supposed to promote.

Respectfully submitted,

James R. Hollis, Executive Director

cc: The Honorable Betty Ann Kane