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March 20, 2014

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

Re: *Telephone Number Portability, et al.*, CC Docket No. 95-116; WC Docket No. 07-149; WC Docket No. 09-109

Dear Ms. Dortch:

I write on behalf of Telcordia Technologies, d/b/a iconectiv ("Telcordia"), to submit for inclusion in the above captioned dockets the enclosed letter from myself, on behalf of Telcordia, to Betty Ann Kane, Chairman of the North American Numbering Council.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Sincerely,

John T. Nakahata

*Counsel to Telcordia Technologies, d/b/a iconectiv*

Attachment

cc: Julie Veach  
Jonathan Sallet  
Philip Verveer  
Ann Stevens  
Diane Griffin Holland  
Sanford Williams



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The Honorable Betty Ann Kane  
Chairman, North American Numbering Council  
Public Service Commission of the District of Columbia  
1333 H. Street, N.W.  
Suite 200, West Tower  
Washington, D.C. 20005

Dear Chairman Kane:

On behalf of Telcordia Technologies, Inc., d/b/a iconectiv, I write in response to the remarkable letter sent to you yesterday by Lisa Hook, President and CEO of Neustar, Inc. It has been over three years since the FCC embraced NANC's and NAPM's plan to put the next Local Number Portability Administrator (LNPA) contract out for the first competitive bidding since 1997, and sought comment on the appropriate selection process. It has been a year and a half since the FCC sought comment on the procurement documents that had been developed by both North American Portability Management's Future of the NPAC Subcommittee and NANC's Selection Working Group (SWG), and over a year since those procurement documents were actually released. A little over a year ago, Neustar told the FCC that it supported the procurement documents and selection process. Suddenly, in various stages since this past October, Neustar has decided that the selection process and procurement documents are all wrong.

Neustar is fundamentally wrong to suggest that the selection process was not designed to safeguard the interests of entities that are not members of the NAPM. That was the fundamental reason behind creation of the SWG. The SWG's membership was open to all NANC members—including representatives of small carriers. As to the broader public interest, including consumers, public safety and law enforcement, those interests are—at a minimum—core concerns for the state public utility commissioners, state public utility advocates and the FCC itself. Neustar never flagged its newly-found concerns for small carriers, public safety and law enforcement during comments on the selection process or the RFP.

There is no reason to believe, as Neustar suggests, that the NPAC will degrade in the absence of a revised RFP and new rounds of bidding. To take just one example, the FCC's rules—implemented through NANC-defined processes—require all simple ports to be completed within one business day. Wireless industry standards are even faster. As such U.S. standards are set by the FCC and the wireless industry. The fact that other countries, such as India, which established a 7 day period, or Brazil—whose NPAC system is supplied by Neustar—established a 3 day period, has no bearing on the performance of the NPAC in the U.S. A change in the LNPA will not change porting intervals already in place and expected by U.S. consumers.

Neustar's last-ditch suggestion that NANC should now develop new benchmarks is nothing more than a recipe for more delay and a way to preserve its revenue stream well beyond the end of the current contract. Defining benchmarks would repeat the notice and comment process that

The Honorable Betty Ann Kane

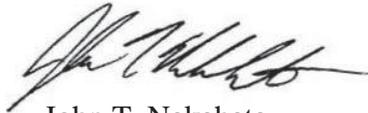
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already occurred on the RFP, without necessarily improving the result of the selection process. This cannot and should not be done simply by inviting yet another round of bids with “sharpened pencils,” as Neustar suggests.

Telcordia believes that Americans deserve the best number portability in the world, but that they also should not be overcharged. As the world leader in number porting, providing service in nineteen countries, Telcordia knows that can be done. We respectfully ask you to complete the selection process in time for a July 2015 implementation. That is in the best interests of American consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata". The signature is fluid and cursive, with a long horizontal stroke at the end.

John T. Nakahata

*Counsel to Telcordia Technologies, Inc., d/b/a iconectiv*

cc: NANC Members  
Julie Veach  
Cary Hinton