



**Kathleen Q. Abernathy**  
Executive Vice President, External Affairs

March 21, 2014

Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O’Rielly  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: *Petition of Neustar, Inc. for a Declaratory Ruling Concerning the Local Number Portability Administration Request for Proposal*

*Local Number Portability, CC Docket No. 95-116*

*Petition of Telcordia Technologies, WC Docket No. 09-109*

Dear Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai and O’Rielly:

On behalf of Frontier Communications, I write today to urge the Commission to ensure that the concerns of mid-size carriers like Frontier and thousands of smaller carriers are taken into careful consideration as part of the selection process for Local Number Portability Administrator (LNPA). We are particularly troubled that this process continues to move forward without input from or consideration of the needs of companies outside of the North American Portability Management, LLC (NAPM) membership. Companies such as Frontier and other local exchange carriers and small providers are key stakeholders heavily invested in the number porting process and dependent on the Number Portability Administrative Center (NPAC) system to ensure accurate porting.

The NPAC is an essential part of the telecommunications infrastructure, supporting choice and competition, reliability and safety, and basic delivery of voice service. The existing infrastructure and NPAC are critical elements to facilitating customer acquisition, ensuring equal access to phone numbers, supporting network evolution and business requirements and enabling Frontier and other smaller providers to effectively compete with the larger providers. Unfortunately, the LNPA selection process does not provide an opportunity for the consideration of smaller carrier concerns. Most significantly, the current Request for Proposal (RFP) does not account for or adequately weigh the risks and costs inherent in an LNPA transition and the significant costs Frontier and smaller carriers would be forced to bear.

At a minimum, the NPAC must retain the same level of functionality and service currently offered, and this must be provided without the need for investment in an entirely new infrastructure. We note that critical functions provided by the NPAC today were simply omitted from the scope of the RFP, including disaster recovery and emergency preparedness, ecosystem monitoring and management, and mass porting capabilities. These functions must be a part of any LNPA selection process at this time; retrofitting the system to include such functions at a later date would be unacceptable. In addition, the current RFP fails to adequately set out a detailed plan for managing the LNPA transition itself, shifting

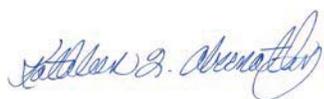
the risk of transition away from the LNPA over to users of the system. This relatively flat cost of changing a carrier's internal system to accommodate a change in LNPA will disproportionately impact the smaller providers.

We understand that cost-per-port is a significant component to consider when evaluating offers of service, but the port cost alone should not be the deciding factor when so much is at stake. Major changes to the NPAC functionality and infrastructure, and a transition of the LNPA, simply to maintain the status quo – a seamless porting process – will be costly for all, and disproportionately more costly for smaller carriers. In addition, the disruption caused by a potentially poor transition and faulty LNP process, particularly likely in light of the deficient RFP, will not only require additional funds, but runs the risk of causing significant damage to the system that enables a competitive market for voice services.

Finally, we stress that any expenditures wasted on unnecessary changes to the NPAC could otherwise be used to serve the needs of American ratepayers – in Frontier's case, those in rural America – with infrastructure upgrades, broadband deployment and customer care.

The RFP requirements employed in the current process were drafted and defined by the NAPM, which has a limited membership of 10 large service providers. The selection process has lacked critical technical and operational input from key affected stakeholders. Many smaller carriers have already written to the Commission to express individual concerns about the RFP process,<sup>1</sup> and many others may not even be aware of the impact that decisions by the NAPM will have on this critical function. The Commission should ensure that there is a neutral selection process and that the North American Number Council acts in the public interest on the basis of informed consensus. Otherwise, the NPAC system faces operational risks that will have a disproportionately costly and anti-competitive impact on Frontier and smaller providers, or it will altogether fail.<sup>2</sup> We respectfully request the Commission take measures to ensure that the selection process and RFP reflect the needs and concerns of all key stakeholders and users of the system.

Sincerely,



Kathleen Q. Abernathy  
Executive Vice President, External Affairs

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<sup>1</sup> See, e.g. Letter from Scott Kell, Executive Vice President, Operations and Engineering of Peerless Network, Inc., to Marlene Dortch, FCC Secretary, CC Dkt. No 95-116, WC Dkt. No. 09-109 (filed Feb. 21, 2014); Letter from John Liskey, Executive Director of the Michigan Internet & Telecommunications Alliance, to Julie Veach, Chief of the FCC's Wireline Competition Bureau, CC Dkt. No. 95-116, WC Dkt. No. 09-109 (filed Feb. 17, 2014); Letter from Angie Kronenberg, Chief Advocate and General Counsel to COMPTTEL, to Marlene Dortch, FCC Secretary, CC Dkt. No. 95-116, WC Dkt. Nos. 07-149, 09-109 (filed Feb. 7, 2014).

<sup>2</sup> See Standish Group International, *Big Bang Boom*, at 2 (2014), available at [blog.standishgroup.com/BigBangBoom.pdf](http://blog.standishgroup.com/BigBangBoom.pdf)