

June 20, 2014

Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

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

Dear Ms. Dortch:

On June 20, 2014, on behalf of Telcordia Technologies, Inc., dba iconectiv, (“Telcordia”), I spoke with Joel Rabinovitz and Neil Dellar of the Office of the General Counsel. I stated that, in light of its conversations with Commission staff and after further reviewing the bid documents, Telcordia believed that there are some portions of the bid documents and can be made available without a protective order, some portions for which a Level 1 (i.e., “Confidential”) protective order is appropriate, and some portions that should remain subject to Level 2 (i.e., “Highly Confidential”) protections as provided in the current protective order. Accordingly, Telcordia believes that the Commission should issue a “Level 1” protective order that would supplement the current protective order.

However, all bid documents, the transcript of the Future of the Number Portability Administration Center’s (“FoNPAC”) interview with Telcordia, presentation materials with respect to that interview, and all other documents, such as the FoNPAC, Selection Working Group (“SWG”), and North American Numbering Council recommendations that contain information derived from the bid or interview documents that would reveal such bid or interview information, should remain eligible for Highly Confidential protection under the current protective order, provided that they otherwise meet the standard for such designation in that order. In other words, all these documents should continue to be listed on Appendix A to the protective order, or otherwise be functionally eligible for designation as Highly Confidential.

In addition, in the context of this unique proceeding in which there are a limited number of vendors and potential vendors, and in order to facilitate review and informed participation by smaller carriers and interconnected VoIP providers, Telcordia believes that the persons eligible to review Highly Confidential information under the current protective order can be expanded beyond Outside Counsel and Outside Consultants for Participants as follows, provided in all cases that the individual is a Participant and is not involved in Competitive Decisionmaking (all capitalized terms are as defined in the Protective Order):

1. In-house counsel and subject matter experts of FCC registered telecommunications carriers and interconnected VoIP providers, provided that the

telecommunications carrier/interconnected VoIP provider is not affiliated with an entity that provides number portability administration or number portability gateway services anywhere in the world;

2. In-house counsel and subject matter experts at trade associations representing FCC-registered telecommunications carriers and interconnected VoIP providers;
3. In-house counsel and subject matter experts at non-profit public interest groups (although this may already be contemplated by the inclusion of attorneys for non-commercial entities in the definition of "Outside Counsel"); and
4. In-house counsel and subject matter experts at federal, state, or local governmental entities (again, this may already be contemplated by the inclusion of attorneys for non-commercial entities in the definition of "Outside Counsel").

To be clear, all of the other requirements of the Highly Confidential Protective Order would apply, including the requirements with respect to protecting Highly Confidential information in any FCC filings.

Telcordia further believes that no extension of the comment deadlines is warranted and that documents can be made available under a Level 1 and modified Level 2 protective order promptly. We make the proposal herein to expedite completion of the comment period.

Sincerely,

/s/ John T. Nakahata

John T. Nakahata
HARRIS, WILTSHIRE & GRANNIS LLP
1200 18th Street, NW, Suite 1200
Washington, DC 20036

Counsel to Telcordia Technologies, Inc., dba iconectiv

cc: Michele Ellison
Joel Rabinovitz
Neil Dellar
Ann Stevens
Sanford Williams
Becky Burr
Aaron Goldberger
Praveen Goyal