

collected this final round of comments, it will be time to bring the selection process to a close, and to approve the NANC's recommendation so that the transition can begin.

B. The Process Was Administered Fairly.

In response to a request from the Bureau,⁷⁷ the NAPM and the SWG both issued reports detailing the selection process. It is clear from these reports the FoNPAC and SWG were foremost concerned with conducting a bid review process and selecting the most qualified bidder at the most competitive price.

First, extending the bid deadline did not prejudice either party. ****BEGIN**

CONFIDENTIAL** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] ****END CONFIDENTIAL**** Moreover, the Commission's staff ****BEGIN**

CONFIDENTIAL** [REDACTED]
[REDACTED] ****END**

National Association of State Utility Consumer Advocates, WC Docket No. 09-109 and CC Docket No. 95-116 (filed Mar. 22, 2011); Comments of Connecticut Department of Public Utility Control, WC Docket No. 09-109 and CC Docket No. 95-116 (filed Mar. 28, 2011).

⁷⁷ Letter from Julie Veach, Chief, Wireline Competition Bureau, to Betty Ann Kane, Chairman, NANC, at 2, WC Docket No. 09-109, CC Docket No. 95-116 (filed Feb. 11, 2014).

⁷⁸ Report of the North American Portability Management LLC in Response to the Wireline Competition Bureau Letter, dated February 11, 2014, at 4-5 (Mar. 20, 2014) ("NAPM Process Report") (attached to NANC Apr. 24 *Ex Parte* Letter).

⁷⁹ NAPM Process Report at Attachment 3.

CONFIDENTIAL** To ensure that no party was prejudiced, NAPM ****BEGIN**

CONFIDENTIAL** [REDACTED]

[REDACTED] ****END CONFIDENTIAL**** and it also simultaneously informed ****BEGIN**

CONFIDENTIAL** [REDACTED]

[REDACTED] ****END CONFIDENTIAL**** In sum, the decision to extend the bid period was based on NAPM's review and investigation of the underlying circumstances, constituted a reasonable exercise of NAPM's discretion in conducting the solicitation, and did not competitively prejudice Neustar in any way.

Second, the NAPM and the Commission had a reasonable basis for declining to issue a second round BAFO and refusing to consider Neustar's unsolicited revised bid. ****BEGIN**

CONFIDENTIAL** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

⁸⁰ E-mail from Sanford Williams, FCC, to Timony Decker (April 16, 2013), NAPM Process Report, Attachment 3. ****BEGIN CONFIDENTIAL**** [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] ****END CONFIDENTIAL****

⁸¹ *Id.* at 4.

REDACTED — FOR PUBLIC INSPECTION

[REDACTED]

****END CONFIDENTIAL****

⁸² *Id.* at 6.

⁸³ NAPM Process Report at 5-6.

CONCLUSION

It is time for the Commission to confirm the selection of Telcordia as the next LNPA and end a process that has now gone on for more than four years. Every month of delay is costing the industry tens of millions of dollars because it will mean that the industry must continue to purchase services from Neustar under the current \$500-million-per-year contract. It is time to bring process to a close by confirming the choice of Telcordia as the next LNPA and allow the consumers to benefit from superior service at a fair price.

Respectfully submitted,



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