

**Before the
Federal Communications Commission
Washington, DC 20554**

In the matter of

Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration and to End the NAPM LLC's Interim Role in Number Portability Administration Contract

WC Docket No. 09-109

Telephone Number Portability

CC Docket No. 95-116

**TELCORDIA'S OBJECTION TO DISCLOSURE
OF CONFIDENTIAL AND HIGHLY CONFIDENTIAL INFORMATION**

Pursuant to the terms of the *Revised Protective Order*,¹ Telcordia Technologies, Inc. d/b/a/ iconectiv ("Telcordia") hereby objects to Neustar's August 15 submission of Acknowledgements of Confidentiality of Randy Buffenbarger and Bruce Armstrong.

Under the *Revised Protective Order*, access to Confidential and Highly Confidential Information is restricted to individuals who are not involved in Competitive Decision-Making for the reviewing party.² Competitive Decision-Making means, *inter alia*, any activities, association, or relationship involving advice about, participation in, or analysis underlying the

¹ Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration and to End the NAPM LLC's Interim Role in Number Portability Administration Contract, Telephone Number Portability, WC Docket No. 09-109 & CC Docket No. 95-116, *Revised Protective Order* (rel. June 25, 2014).

² See *id.* at 3 (excluding Competitive Decision-Makers from definitions of individuals authorized to view Confidential and Highly Confidential Information); *id.* Attachment B (requiring *Protective Order* signatories to acknowledge, *inter alia*, that they are not involved in Competitive Decision-Making).

relevant business decisions, of a company in competition with the Submitting Party.³ This broad definition is not limited to decisions specific to the LNPA RFP.

As Neustar admits, Mr. Armstrong is the Regional Director for Pooling. According to his LinkedIn profile, he is the “Quality Assurance Director for National Telephone Number Pooling contract with FCC”⁴—a contract on which both Telcordia and Neustar have competed. Moreover, Mr. Armstrong’s role appears to involve Competitive Decision-Making in that he is involved with “[d]atabase design and development,” “reports design and generation,” and “[o]verall management of change order process and testing.”⁵ These duties involve decisions about how Neustar will compete in number pooling and therefore disqualify him from viewing Confidential or Highly Confidential Information. Neustar asserts that Mr. Armstrong is qualified because he allegedly “had no involvement in Neustar’s response to the 2015 LNPA RFP,” but that does not ensure that he is not involved in Competitive Decision-Making for Neustar—a company “in competition with” Telcordia⁶. Nor does it even ensure that he will have no involvement with the NPAC in the future: the pooling system interfaces with the NPAC, raising the possibility that Mr. Armstrong may even make competitive decisions involving the NPAC.

Similarly, Telcordia has substantial concerns about Mr. Buffenbarger’s assertions that he is not involved in Competitive Decision-Making. Although Neustar proffers Mr. Buffenbarger as a self-employed consultant, Mr. Buffenbarger’s LinkedIn profile states his current position as

³ *Id.* at 2.

⁴ See Bruce Armstrong, LinkedIn.com, <http://www.linkedin.com/pub/bruce-armstrong/32/228/997> (last visited Aug. 19, 2014) (attached hereto as Exhibit A).

⁵ *Id.*

⁶ See *Revised Protective Order* at 2.

“VP Business Operations at NeuStar, Inc.,”⁷ a position that almost certainly would involve Competitive Decision-Making. Even if Mr. Buffenbarger has recently left Neustar, his recent involvement in Competitive Decision-Making raises substantial questions about the propriety of allowing him to view Telcordia’s proprietary information.

Respectfully submitted,

/s/ John T. Nakahata

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Dated: August 19, 2014

⁷ See Randy Buffenbarger, LinkedIn.com, <http://www.linkedin.com/pub/randy-buffenbarger/4a/192/191> (last visited Aug. 19, 2014) (attached hereto as Exhibit B).

CERTIFICATE OF SERVICE

I, John T. Nakahata, hereby certify that on August 19, 2014, a copy of the foregoing Objection to Disclosure of Confidential and Highly Confidential Information was served by electronic mail to the following:

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Counsel for the NAPM LLC

/s/ John T. Nakahata
John T. Nakahata

EXHIBIT A



Bruce Armstrong
 Regional Director - QA at Neustar
 Greater Denver Area | Telecommunications

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Bruce Armstrong's Overview

Current	Regional Director -Quality Assurance at NeuStar, Inc.
Past	Senior Professional Engineer at Colorado Public Utilities Commission Manager - Costs, Rates and Regulatory Matter of AT&T
Education	University of Colorado at Boulder Texas Tech University Texas Tech University
Connections	71 connections
Websites	Company Website Company Website

Bruce Armstrong's Summary

Highly skilled professional in design and development of numerically-based or data-driven practical applications, particularly related to telecommunications. Extensive experience in database design, data mining, large data applications, and presentations to both technical and non-technical personnel. Experienced in expert testimony preparation, preparation of legal briefs, and submitting to cross examination in regulatory and legislative environments.

Specialties

Economic or statistical analyses; database design, development and maintenance; expert testimony; telecommunications; large database mining and report production; public presentations. Computer applications.

Bruce Armstrong's Experience

Regional Director -Quality Assurance
NeuStar, Inc.

Public Company; 1001-5000 employees; ISP; Information Technology and Services Industry
 May 1999 – Present (15 years 4 months)

Quality Assurance Director for National Telephone Number Pooling contract with FCC. Database design and development, data mining, data quality, implementation, reports design and generation. Overall management of change order process and testing.

Senior Professional Engineer

Colorado Public Utilities Commission
 May 1986 – May 1989 (11 years 1 month)

Staff expert on telecommunications regulatory issues: engineering, accounting, financial, costs, and economics. Expert witness testimony preparation, cross examination, development of rules and statutes. Development of complex numerical accounting analyses. Chair of Colorado Numbering Task Force. Alternate member of the North American Numbering Council. Colorado representative on the Regional Oversight Committee.

Manager - Costs, Rates and Regulatory Matter

AT&T
 Public Company; 10,001+ employees; T; Telecommunications Industry
 December 1983 – August 1987 (3 years 9 months)

Expert testimony preparation and cross examination in state regulatory environment. Development and management of costs, pricing, and product planning for AT&T Long Distance Services in Rocky Mountain region. Pricing and costing models.

Bruce Armstrong's Skills & Expertise

- Analysis
- Product Management
- Telecommunications
- Management
- Databases
- Testing
- Project Management
- Business Analysis
- Process Improvement
- Integration
- Quality Assurance
- Vendor Management
- Cross-functional Team Leadership
- Team Leadership

Bruce Armstrong's Education

University of Colorado at Boulder

MBA, Business Administration
 1986 – 1988

Executive MBA Program

Texas Tech University

MS, Physics

1970 – 1972

Activities and Societies: Thesis: High Energy X-Ray Spectroscopy at Low Temperature

Texas Tech University

BS, Engineering Physics

1966 – 1970

NASA Mars probe research project

Activities and Societies: Texas Tech Band, Society of Physics Students, Sigma Pi Sigma Honorary

Bruce Armstrong's Additional Information

- Websites:
 - [Company Website](#)
 - [Company Website](#)
- Interests: **Music performance, church activities, volunteer travel, fitness, cycling.**
- Honors and Awards: **Neustar Polaris Award for Excellence**
-

Contact Bruce for:

- [consulting offers](#)
 - [expertise requests](#)
-

View Bruce Armstrong's full profile to...

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EXHIBIT B

Randy Buffenbarger

VP Business Operations at NeuStar, Inc.

Leesburg, Virginia (Washington D.C. Metro Area) | Information Technology and Services

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Randy Buffenbarger's Overview

Current **VP Business Operations at NeuStar, Inc.**
Education **The Ohio State University**
Connections **1 connection**

Randy Buffenbarger's Experience

VP Business Operations

NeuStar, Inc.

Public Company; 1001-5000 employees; NRP; Information Technology and Services Industry

Currently holds this position

Randy Buffenbarger's Education

The Ohio State University

Contact Randy for:

- career opportunities
- new ventures
- expertise requests
- reference requests
- consulting offers
- job inquiries
- business deals
- getting back in touch

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