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August 20, 2014

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

Electronically Filed

Re: CC Docket No. 95-116; WC Docket No. 09-109

Dear Ms. Dortch:

I write in response to the letter from Admiral (ret.) James Arden Barnett, Jr., counsel to Telcordia Technologies, Inc. ("Ericsson"), dated August 19, 2014. Neustar shares and supports the Commission's commitment to protecting national security, but contrary to Ericsson's charges in its August 19 letter, Neustar has not been the arbiter of what is and is not redacted on that basis in this proceeding. On the contrary, staff has made clear on several occasions its view that the Commission has authority to determine, in its sole discretion, whether or not access to information in this proceeding will be restricted on national security grounds. Rather than seeking to limit access to such materials, Neustar has sought more formal, written guidance as to the standard to be applied going forward, which the Commission has declined to provide.

Neustar has consistently pushed for greater transparency in this proceeding. On July 21, 2014, for example, we wrote to "express concern about the inability of interested and responsible parties to obtain information from the proposals submitted by Neustar and by Ericsson that has been redacted at the Commission's direction for national security reasons" and urged the Commission to "take immediate action to ensure appropriate access to unredacted versions of the parties' proposals for persons with a legitimate need to know and who subscribe to the protective order."¹ We have reiterated and confirmed this view in our conversations with Commission staff, as reflected in various ex parte letters.

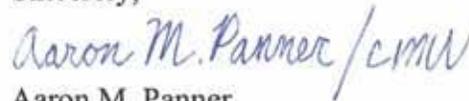
¹ Letter from Aaron M. Panner to Marlene H. Dortch, CC Docket No. 95-116; WC Docket No. 09-109 (FCC filed July 21, 2014).

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As Commission staff has acknowledged, and contrary to Ericsson's accusation, Neustar has not "used the FCC's concern for security to cover unclassified arguments from review and response by Telcordia." Given that Neustar (i) has had no response to its July 21 request for company access to information in bid documents redacted for national security reasons and (ii) is operating under the same procedures for accessing and reviewing Restricted Access information that Ericsson complains of, we do not see how Ericsson has been unfairly prejudiced in this regard. Nonetheless, we remain fully prepared to work with Commission staff to make more information available to the public, while ensuring that security concerns are adequately addressed. As Neustar noted in a recent ex parte letter, "Neustar's strong preference [is] for clear and neutral standards to guide parties making national security redactions, as well as procedures to contest or seek modification of such redactions going forward."²

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Sincerely,


Aaron M. Panner

cc: Allan Manuel
Neil Dellar
Michele Ellison
Lisa Gelb
Randy Clarke

² Letter from Stewart Baker to Marlene H. Dortch, CC Docket No. 95-116; WC Docket No. 09-109 (FCC filed August 18, 2014).