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August 5, 2014

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentations, CC Docket No. 95-116; WC Docket No. 07-149;
WC Docket No. 09-109**

Dear Ms. Dortch:

On Friday, August 1, 2014, Neustar, Inc. representatives Lisa Hook, President and CEO; Leonard Kennedy, Senior Vice President and General Counsel; Rodney Joffe, Senior Vice President, Senior Technologist and Fellow; Terri Claffey, Senior Policy Advisor, Law and Public Policy; and Neustar counsel Stewart Baker of Steptoe & Johnson, Michael Sussmann of Perkins Coie, and Michele Farquhar of Hogan Lovells (collectively, "Neustar") met with Rear Admiral (ret.) David Simpson, Chief of the Public Safety and Homeland Security Bureau ("PSHSB"), Allan Manuel of PSHSB, and Joel Rabinovitz of the Office of General Counsel.

During the meeting the parties discussed issues relating to the national security and public safety implications of the Local Number Portability Administrator ("LNPA") selection process, and reviewed a list prepared by Neustar of potential LNPA selection process national security mitigation requirements, a redacted version of which is attached to this filing. The participants also addressed the Local Number Portability Enhanced Analytical Platform ("LEAP")

[REDACTED]

[REDACTED]

Moreover, the integration of Ericsson's commercial operations, its current nationwide local exchange carrier number routing databases, its telecommunications network infrastructure and the NPAC create adverse technical, operational, national security, legal and policy risks. For example, such integration would make it impossible for Ericsson to be an impartial and neutral LNPA as required by law. By having a dominant interest in the wireless sector, Ericsson has the ability and incentive to disadvantage the wireline, smaller carrier, cable operator, law enforcement, and public safety communities, who are all reliant on the NPAC and rely on the neutrality of the LNPA.

Neustar concluded by urging the Commission to incorporate appropriate national security and public safety safeguards into the LNPA RFP and to ensure that these safeguards are a factor in the Commission's selection of an LNPA vendor.

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this notice electronically in the above-referenced dockets. Please contact me directly with any questions.

Respectfully submitted,

/s/ Michele Farquhar

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cc: Rear Admiral (ret.) David Simpson
Allan Manuel
Joel Rabinovitz

Potential LNPA Selection Process National Security Mitigation Requirements	Required by RFP
COMMON EXECUTIVE BRANCH SECURITY REQUIREMENTS /(Team Telecom or CFIUS requirements)	
Servers/data centers/user data must be maintained/stored in U.S.	✓
No remote write/administrator access permitted from outside U.S.	✗
Personnel with system access must be screened, clearable, and identified to USG in advance of hiring	✗
Non-U.S. citizens may not write/modify/have access to source code	✗
Employ U.S. citizen as security officer with responsibility for network access	✗
Appropriate security measures also applicable to backup data center	✗
Written security plan to address physical, cyber, supply chain, and personnel security	✗
Cyber elements of security plan keyed to NIST Cybersecurity Framework	✗
USG to review/approve draft security plan within 60 days of contract award	✗
No deviation from security plan without written USG approval	✗
Regular compliance and security incident reports to USG	✗
Regular compliance inspections by USG	✗
Periodic audit by third party	✗

* Rather than requiring continuity, the RFP states that LEAP is “not necessary” and that the “LNPA shall ensure that [LEAP] does not adversely affect the operation and performance of the NPAC/SMS, and any adverse effect shall be cause for [its] termination.”