

# NENA

## The 9-1-1 Association

1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

August 22, 2014

Re: ***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***

Dear Ms. Dortch:

On behalf of NENA: The 9-1-1 Association, I am writing regarding the ongoing proceeding concerning the recommendation of the North American Numbering Council ("NANC") that the Federal Communications Commission ("FCC") select Telcordia Technologies, Inc. ("Telcordia") to serve as the next local number portability administrator ("LNPA").

As the Voice of 9-1-1, NENA is on the forefront of all emergency communications issues. The association serves its members and the greater public safety community as the only professional organization solely focused on 9-1-1 policy, technology, operations, and education issues. On behalf of its members, NENA works with 9-1-1 professionals nationwide, public policy leaders, emergency services and telecommunications industry partners, like-minded public safety associations, and other stakeholder groups to develop and carry out critical programs and initiatives, to facilitate the creation of an IP-based Next Generation 9-1-1 system, and to establish industry leading standards, training, and certifications.

Although NENA and its members do not take a position on the NANC recommendation of Telcordia as the next LNPA, NENA feels strongly that the selection of the next LNPA must not negatively impact 9-1-1 reliability. NENA agrees with comments filed in this proceeding by Intrado, Inc., a provider of 9-1-1 products and services, that the FCC must ensure that tools and applications for the timely and economical management of 9-1-1 data currently in use must remain available to 9-1-1 providers at no cost, and that any transition to a new LNPA must not be allowed to adversely affect 9-1-1 data management.<sup>[1]</sup> To the extent that candidates for LNPA have not been asked to demonstrate their ability to maintain the number portability services currently relied on by 9-1-1 providers, the FCC should consider amending the Request for Proposals to require confirmation that these critical services will continue to be available.

---

<sup>[1]</sup> See Comments of Intrado, Inc., WC Docket No. 09-109, CC Docket No. 95-116 at 2-4 (filed July 24, 2014).

Other commenters have also noted the importance of the LNPA to public safety and law enforcement in the United States. The International Association of Chiefs of Police and the National Sheriffs' Association recommended that the Commission consider the ability of the LNPA vendor to satisfy "the important law enforcement, public safety, and national security equities of the local, tribal, state and federal law enforcement agencies who rely on the important and highly sensitive services the LNPA provides."<sup>[2]</sup> Similarly, the Federal Bureau of Investigation, the Drug Enforcement Administration, the United States Secret Service, and U.S. Immigration and Customs Enforcement wrote to the FCC to emphasize the important role that the LNPA plays in the day-to-day work of law enforcement agencies, and to highlight the harm that could arise if these functions were disrupted either through a failure on the part of the LNPA, or through interference by individuals or entities located outside the U.S. as a result of foreign influence over the LNPA.<sup>[3]</sup> NENA shares these concerns.

In addition to weighing the impact on 9-1-1 services resulting from a transition of the LNPA, NENA believes the FCC should consider the ability of a new LNPA to seamlessly enable the IP transition, including the transition to Next Generation 9-1-1 services. To ensure that the stability of the numbering platform is not threatened during the IP transition, the LNP Alliance has urged the Commission to extend the contract of the current LNPA, Neustar, Inc., for two years.<sup>[4]</sup> NENA supports this proposal, while adding that the FCC should strongly consider requiring candidates for LNPA to explain in detail their proposals for negotiating this critical and technologically complicated transition.

9-1-1 services, including Next Generation 9-1-1, are part of the backbone of the public safety infrastructure in the U.S., and the FCC must ensure that any vendor selected to serve as LNPA can deliver 100 percent accuracy, and 100 percent reliability, 100 percent of the time. NENA asks the FCC to take into account the various law enforcement, public safety and homeland security concerns implicated by local number portability in making its selection of the next LNPA.

Respectfully submitted,

/s/ Brian Fontes

Brian Fontes, CEO  
NENA: The 9-1-1 Association

---

<sup>[2]</sup> Joint Reply Comments of the International Association of Chiefs of Police and National Sheriffs' Organization, CC Docket No. 95-116, WC Docket No. 09-109 at 2 (filed Aug. 20, 2014).

<sup>[3]</sup> See *generally* Reply Comments of the Federal Bureau of Investigation, the Drug Enforcement Administration, the United States Secret Service, and U.S. Immigration and Customs Enforcement, CC Docket No. 95-116, WC Docket No. 09-109 (filed Aug. 11, 2014).

<sup>[4]</sup> Comments of the LNP Alliance, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 at 21 (filed July 25, 2014).