

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter Of	)	
Petition of Telcordia Technologies, Inc.	)	WC Docket No. 09-109
To Reform Or Strike Amendment 70,	)	
to Institute Competitive Bidding for Number	)	
Portability Administration and to End the	)	
NAPM's LLC's Interim Role in Number	)	
Portability Administration Contract	)	
)	)	
Telephone Number Portability	)	CC Docket No. 95-116

**COMMENTS OF TELECOMMUNICATION SYSTEMS INC.**

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TeleCommunication Systems, Inc. (“TCS”) respectfully submits the following comments in connection with Public Notice released June 9, 2014 by the Federal Communications Commission (“FCC” or “Commission”) regarding the recommendation to select Telcordia Technologies, Inc. (“Telcordia”) as the next Local Number Portability Administrator (“LNPA”), replacing the existing LNPA, Neustar, Inc. (“Neustar”).

## **I. Introduction**

TCS relies heavily upon tools, processes and interfaces provided by the LNPA, specifically with respect to 9-1-1 services in support of wireless and Voice-over-IP (“VoIP”) carriers as well as numbering management services in support of Next Generation 9-1-1 (“NG9-1-1”) deployments. The numbering management, call routing and validation, and location validation functions needed in these environments require that TCS have regular interactions with the LNPA, and our comments are in relation to these interactions and interfaces. These TCS services are well recognized, and we go to great lengths to ensure that the processes that we utilize are efficient and meet or exceed our Service Level Agreements with our carriers and other 9-1-1 Service Providers as well as 911 Authorities who contract with us to provide Automatic Location Information (“ALI”) Database Management Services.

## **II. Number Management Services are Critical Components of Existing 9-1-1 Systems**

Almost two decades ago, TCS pioneered techniques to route wireless 9-1-1 calls that relied upon then-unused portions of the North American Numbering Plan (“NANP”). Emergency Service Routing Keys (“ESRK”) became a critical component needed to route calls to the appropriate Public Safety Answering Point (“PSAP”) without requiring major changes to our public safety infrastructure. Later, these same routing techniques, and the creation of Emergency Service Query Keys (“ESQK”), were implemented by TCS to support VoIP 9-1-1 calls. These solutions are used today to support all wireless and VoIP 9-1-1 calls in the United States, whether by TCS or other vendors. We have well-understood and established processes to procure the necessary ESRKs and ESQKs to support the hundreds of millions of 9-1-1 calls made every year.

More recently, the underlying public safety architecture has begun a transition to an IP-based NG9-1-1 architecture. This architecture establishes an Emergency Service IP-based network (“ESInet”) for call validation, call routing, and location validation functions. TCS is recognized as the largest provider of Emergency Services IP-based networks in the country.<sup>1</sup> A necessary part of this function involves the provision of Legacy Network Gateways which rely upon interfaces to the LNPA to properly manage the ALI databases needed for call management and validation.

## **III. Selection of the LNP Vendor Must Not Negatively Impact 9-1-1 Reliability**

TCS takes no position on either the selection of Telcordia as the LNPA vendor or the fairness of the process that resulted in the NANC recommendation of Telcordia to the Commission. It is appropriate for the Commission to consider the ability of the LNPA vendor to provide effective day-to-day processes

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<sup>1</sup> “As of Q1 2014, Frost & Sullivan estimates TCS to have 56% of the ESInet software market, followed by Intrado (31%), Bandwidth.com (8%), and Solacom (5%)”

Source: “Next Generation 911 (NG911) Market Insight”; Frost & Sullivan; July, 2014

in support of LNP. Thousands of numbers are ported each day and changes to ALI are also made daily. These are critical to the verification of ownership and management of the numbers being unlocked by one communications service provider ("CSP") but not yet migrated to another CSP. In addition, TCS regularly obtains ESRKs and ESQKs to support our 9-1-1 customers; and we have established processes with the FCC and Neustar that allow us to obtain these numbering resources.

TCS has worked with the current vendor Neustar for a number of years. As might be expected when working with a company for over a decade, TCS and Neustar have established processes, tools and interfaces that allow us to efficiently obtain the numbering resources needed to support our 9-1-1 operations.

In the FCC's LNP Request for Proposal, there were many sections that addressed areas of measurements, platform availability, benchmarking, audits, and customer support. These areas are clearly important. Of similar importance is the ability to support existing interfaces used by TCS and many other vendors in the 9-1-1 ecosystem; failing to do so could result in short-term disruptions and long-term inefficiencies and added costs.

Therefore, TCS respectfully requests that the Commission ensure that any transition of the LNP processes, tools and/or Administrator be well documented; that such transition addresses the replacement or replication of existing processes, tools and interfaces; and that current users be consulted with regards to replicating or replacing existing processes and interfaces. A thoughtful plan should be expected from an Administrator, and any new processes and tools should be well vetted so that critical daily operational matters affecting the 9-1-1 data are not interrupted. TCS also asks that the costs to companies like TCS remain economically reasonable, regardless of the vendor selected; the LNPA selection should allow cost savings for all LNPA users.

#### IV. Conclusion

TCS appreciates the opportunity to comment on the recommendation of a vendor to serve as the Location Number Portability Administrator and praises the Commission and the NANC for their work. TCS asks that the Commission ensure that any transition plan does not adversely affect 9-1-1 data management specific to the LNP-related processes.

Respectfully submitted,

TeleCommunication Systems, Inc.

August 22, 2014

*/s/ Timothy James Lorello*  
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