



N A R U C
National Association of Regulatory Utility Commissioners

September 11, 2014

Julie A. Veach
Chief, Wireline Competition Bureau
Federal Communications Commission
445 – 12th Street, S.W., Room TW-A325
Washington, D.C. 20554.

RE: *NARUC Formal Nomination of the Honorable Charles Peterson, to replace one State vacancy on the North American Numbering Council caused by recent departure of Commissioner Why (Filed in CC Docket 92-237).*

Dear Ms. Veach,

Recently, the Honorable Geoffrey G. Why resigned from his post as a representative of the National Association of Regulatory Utility Commissioners (NARUC) to the North American Numbering Council (NANC). In accordance with NARUC's Policy Governing Committees and Representatives, to fill the one NARUC vacancy on the NANC, NARUC President Colette D. Honorable nominates:

***The Honorable Karen Charles Peterson, Commissioner
Massachusetts Department of Telecommunications and Cable***

As has been NARUC's practice, we submitted this nomination on August 22, 2014 via a letter to the FCC Chair. However, the undersigned subsequently discovered that letter does not meet the requirements outlined in the notice subsequently forwarded by FCC staff. That notice outlines several requirements for any NANC nomination request.

First, it requires that the request be submitted to Julie A. Veach, Chief, Wireline Bureau, Federal Communications Commission, 445 12th Street, SW, Room 5-C450, Washington, DC 20554, with copies to Lisa Gelb, Jamie Susskind, Randy Clarke, Ann Stevens, Sanford Williams, Marilyn Jones, and Carmell Weathers.

A copy of this nomination is being e-mailed directly to the following:

***Julie A. Veach, Chief, Wireline Competition Bureau
Lisa Gelb, Deputy Chief, Wireline Competition Bureau
Jamie Susskind, Legal Counsel, Wireline Competition Bureau
Randy Clarke, Acting Chief, Competition Policy Division, WCB
Ann Stevens, Deputy Chief, Competition Policy Division, WCB
Sanford Williams, Assistant Chief, Wireline Competition Bureau
Marilyn Jones, Attorney Advisor, Designated Federal Officer
Carmell Weathers, Special Assistant to the Designated Federal Officer***

As a courtesy, copies are also being forwarded to:

DC PSC Chairman Betty Anne Kane, *NANC Chair*
Daniel Alvarez, *Senior Counselor to Chairman Wheeler*
Michelle Sclater, *Alternate Designated Federal Officer*

Second it requires the name, title, phone and fax number, mailing address, and e-mail and organization of the nominee.

NAME: The Honorable Karen Charles Peterson
TITLE: Commissioner of the MA Dept. of Telecommunications and Cable
ORGANIZATION: National Association of Regulatory Utility Commissioners
ADDRESS: Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02110
E-MAIL: karen.c.peterson@state.ma.us
TELEPHONE: 617-368-1116 [Fax – 617-988-8217]

Third, it requires “a description of the sector or interest the nominee will represent”.

The short answer is “the public interest.” NARUC is a quasi-governmental nonprofit organization founded in 1889. NARUC represents government officials in the fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands, charged with the duty of regulating, inter alia, the telecommunications common carriers and other critical gas, electric, and water infrastructures within their respective borders. Both the United States Congress – in federal telecommunications legislation, and federal courts have recognized that NARUC is a proper party to represent the collective interest of the State regulatory commissions. See, e.g., 47 U.S.C. § 410 (1986), where Congress calls NARUC “the national organization of the State commissions” responsible for economic and safety regulation of the intrastate operation of carriers and utilities. Cf. 47 U.S.C. § 254 (1996). See, also, USA v. Southern Motor Carrier Rate Conference, et al., 467 F. Supp. 471 (N.D. Ga. 1979), aff. 672 F.2d 469 (5th Cir. Unit “B” 1982); aff. en banc, 702 F.2d 532 (5th Cir. Unit “B” 1983, rev’d, 471 U.S. 48 (1985). See, also Indianapolis Power and Light Co. v. ICC, 587 F.2d 1098 (7th Cir. 1982); Washington Utilities and Transportation Commission v. FCC, 513 F.2d 1142 (9th Cir. 1976). State commissions have always played a crucial role on number conservation and associated routing issues. Our members have regular calls with the NANPA. Because of the obvious State interests in numbering issues, NARUC filed the original request seeking creation of the NANC and has, since its inception, had several active members participating on this advisory committee, including the current NANC Chair.

Fourth, it requires “a written commitment that the applicant shall actively participate in good faith in the objectives of the Council.”

I have Commissioner Peterson’s authorization to provide this written affirmation of her intent to actively participate in good faith in the objectives of the Council.

Fifth, the notice requires that NARUC confirm that our nominee is not a registered federal lobbyist.

Commissioner Peterson is not a registered federal lobbyist.

Sixth, the notice requires “evidence that the nominee’s are authorized to represent the parte related to the interests the party proposes to represent.”

As NARUC’s General Counsel, I certify that NARUC’s President has nominated Commissioner Peterson to represent the interests of NARUC on the NANC.

Seventh, the notice requires a summary of why the applicant is an interested party.

Massachusetts, like all NARUC members, has a strong interest in (1)preserving number resources in Massachusetts, (2) assuring local number portability, (3) efficient operation of the NANPA, and (4) maintaining the efficient routing and security of communications.

Finally, the notice requires the naming of an alternate if Commissioner Peterson cannot attend.

NAME: Mr. Kalun Lee
TITLE: Acting General Counsel
**ADDRESS: Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02110**
E-MAIL: kalun.lee@state.ma.us
TELEPHONE: 617-368-1111 [Fax – 617-988-8217]

For your convenience, I have attached a short biographical sketch to this letter. If you have any questions about this nomination, please do not hesitate to call me at 202.898.2207 or jramsay@naruc.org.

Respectfully Submitted,

James Bradford Ramsay
General Counsel
National Association of Regulatory Utility Commissioners

cc: Chairman Betty Anne Kane, *NANC Chair*
Daniel Alvarez, *Senior Counselor to Chairman Wheeler*
Julie A. Veach, *Chief, Wireline Competition Bureau*
Lisa Gelb, *Deputy Chief, Wireline Competition Bureau*
Jamie Susskind, *Legal Counsel, Wireline Competition Bureau*
Randy Clarke, *Acting Chief, Competition Policy Division, WCB*
Ann Stevens, *Deputy Chief, Competition Policy Division, WCB*
Sanford Williams, *Assistant Chief, Wireline Competition Bureau*
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Michelle Sclater, *Alternate Designated Federal Officer*
Carmell Weathers, *Special Assistant to the Designated Federal Officer*



The Honorable Karen Charles Peterson

COMMISSIONER, MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Karen Charles Peterson is the current Commissioner for the Massachusetts Department of Telecommunications and Cable (DTC) for the Patrick Administration. She is the former Chief of Staff for DTC. Formerly acting Chief of Staff for the MBTA, Karen has years of leadership experience in city and state government, including Chief of Staff of the Executive Office of Transportation and of the Registry of Motor Vehicles. For 5 years she was the booking producer for the award winning news program, Greater Boston with Emily Rooney on WGBH. Karen is a 1993 graduate of Suffolk University where she received a Bachelor of Science degree in Government. She is a 1997 graduate of the Center for Women in Politics and Public Policy at the University of Massachusetts, Boston. Karen is the past president of the Conference of Minority Transportation Officials (COMTO), and the 1999 recipient of the Wonder Woman Award from The Massachusetts Women's Political Caucus. Karen is a former Trustee at the Advent School in Boston, where she recently led the search for the new Head of School. Karen's hobbies include reading and traveling. She lives in Boston with her husband, Kevin C. Peterson.