September 8, 2009

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Re: Comments of COMPTEL; WC Docket No. 09-109

Dear Ms. Dortch:

COMPTEL respectfully submits these comments, pursuant to the Federal Communications Commission’s (“Commission”) Public Notice released on August 6, 2009 (DA 09-1762), in the above-referenced docket. In its Petition Telcordia asks the Commission to direct the NAPM to refrain from executing the provision of Amendment 70 which allows Neustar to implement Uniform Resource Indicator (URI) fields for Voice, Multimedia Messaging Service, and Short Messaging Service to the Number Portability Administrative Center (NPAC) database, pending further review by this Commission, noting that this issue is subject to a separate letter filed by Telcordia with the Commission.¹ In filings with the Commission and the NANC, Telcordia disputes whether the inclusion of these URI fields in the NPAC comports with Rule 52.25(f),² which states that “[t]he information contained in the regional databases shall be limited to the information necessary to route telephone calls to the appropriate telecommunications carriers….³

As discussed in the filing COMPTEL submitted to the NANC, attached for incorporation in the above-referenced docket, the inclusion of these URI fields in the NPAC is consistent with Rule 52.25(f) and, consequently, the Commission should deny Telcordia’s request to direct the NAPM to refrain from including these URI fields in the NPAC.

¹ Telcordia Petition at iv.  
² Letter of John T. Nakahata, Counsel to Telcordia Technologies, Inc. to Thomas M. Koutsky, Chairman, North American Numbering Council, Re: Request that NANC Resolve Dispute Concerning Necessity of Adding Certain URI Codes for the Completion of Telephone Calls, p. 12 dated May 26, 2009 (“Telcordia NANC Dispute”).  
³ 47 CFR 52.25(f).
Respectfully submitted,

/s/

Karen Reidy

Attachment