Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

The 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 Management

WC Docket No. 09-109

COMMENTS OF XO COMMUNICATIONS, LLC

XO Communications, LLC (“XO”) hereby submits these comments in opposition to the Petition¹ of Telcordia Technologies, Inc. (“Telcordia”) in the above-referenced proceeding. XO opposes Telcordia’s request to overturn the portability contract between the industry and third party administrator, Neustar, Inc.

XO is a facilities-based provider of innovative telecommunications, broadband, and information services, such as Voice over Internet Protocol, data and Internet access, network transport, hosting, fixed wireless access, and managed services to businesses, enterprise, and carrier customers nationwide. XO’s network includes over an 18,000 route mile intercity network, more than 3000 fiber-fed buildings, and wireless spectrum in 81 markets.

¹ 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 Management, filed May 20, 2009.
As a member of the North American Portability Management, LLC (“NAPM LLC”), XO supports the NAPM LLC’s decisions regarding Amendments 70 and 72. Those decisions benefit the industry by lowering the costs of number portability while introducing needed new functionality. Thus, the Commission should not intervene to overturn these Amendments or the Master Agreement as a whole.

In addition, as a competitive carrier, XO believes that competition is enhanced by having the Number Portability Administration Center (the “NPAC”) – a database available on an equal basis to all service providers – as an IP routing option for carriers. Telcordia’s argument that the Commission should preclude this open database from containing any IP routing information could impede the development of competition.

Telcordia suggests that IP routing information in the NPAC is not “necessary” because IP calls can be routed using the legacy circuit-switched PSTN or because providers can subscribe to an ENUM routing database such as the CC1 ENUM database run by Telcordia. However, it is much more efficient for XO, which runs an IP network, to exchange traffic at an IP level rather than being forced to transcode transmissions from IP to TDM to send to another network, only to have the transmission possibly transcoded back to IP for termination. Carriers should be able to decide which IP routing option is the most efficient solution; therefore, XO opposes Telcordia’s efforts to reduce the IP routing options for carriers.
Resolution of this dispute as Telcordia requests could increase the costs of number portability to all carriers and slow the roll-out of new IP-based services that will benefit consumers and spur the competition envisioned by the Telecommunications Act of 1996. The Commission is currently developing a national broadband strategy to drive the expansion of broadband throughout the country. In this vein, the Commission should be looking for ways to expand IP routing and the deployment of new IP services.

Respectfully submitted,

By: /s/ ________________________________

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