March 18, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte – CC Docket No. 95-116; WC Docket No. 09-109

Dear Ms. Dortch:

On March 16, 2015, Senator John Breaux of Squire Patton Boggs (US) LLP, on behalf of Neustar, Inc. (Neustar), spoke by telephone with Commissioner Mignon Clyburn of the Federal Communications Commission (Commission) to discuss issues related to the Commission’s consideration of a draft order to select Ericsson as the next Local Number Portability Administrator (LNPA).

In the call, Senator Breaux highlighted that local number portability was one of the Telecommunications Act’s fundamental provisions to promote local telephone competition. As such, it is imperative that a potential transition have no impact on the critical services that the LNPA provides. Senator Breaux encouraged Commissioner Clyburn to request that the Chairman postpone the Commission’s vote on the draft order to allow for more time for the Commission to review the ramifications of this selection. Senator Breaux also recommended that the Commission complete a full analysis of the potential impact of the transition on carriers – particularly small and rural carriers – and on consumers. Finally, to address any procedural issues and ensure that the selection process provides opportunity for meaningful public comment, Senator Breaux requested that the Commission, wherever possible, make public all information submitted to the FCC in these proceedings.

Number portability is no small task. The LNP database today contains over 700 million telephone numbers and is the authoritative database for the real time routing of over 12 billion text messages and telephone calls every day.¹ The LNPA processes updates to the database in real time and pushes updates to over 2,000 carriers within seconds of the change.

being made. Despite these challenges, today, portability is such a smooth process that consumers are likely unaware that portability could become a serious problem.

It is vital that this remain a smooth process – number portability is good for competition and good for consumer choice. With good cause, commenters continue to raise concerns about the cost of a transition on consumers and on carriers that they feel have not been fully addressed.\(^2\) A particular concern is the impact of a transition on smaller carriers, which lack the engineering resources or the revenue base to withstand the transition burdens.\(^3\) For many small competitive carriers, number portability is their lifeblood for growth. A disruption in portability means a disruption in their ability to compete. Accordingly, groups representing rural carriers and small to medium sized carriers have asked the Commission to conduct a Regulatory Flexibility Act analysis on a potential transition before moving forward.\(^4\) Senator Breaux encouraged Commissioner Clyburn to advocate for analysis of the impact of a potential transition on small business and on consumers.

Thank you for your full consideration of these issues vital to consumers and to the communications marketplace.

Respectfully submitted,

/s/
Benjamin D. Tarbell
Squire Patton Boggs, LLP
2550 M Street, NW
Washington, DC 20037
202-457-6159
Counsel to Neustar, Inc.

cc:
Commissioner Mignon Clyburn
Rebekah Goodheart

---


\(^3\) Id.

\(^4\) See NTCA, et al. Ex Parte at 1; LNP Alliance Ex Parte at 3.