In the Matter of

The Petition of Telcordia Technologies, Inc. To Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration

WC Docket No. 07-149

REPLY COMMENTS OF CENTER FOR COMMUNICATIONS MANAGEMENT INFORMATION

The Center for Communications Management Information ("CCMI") submits these reply comments in response to the Petition filed by Telcordia Technologies Inc. ("Telcordia").

CCMI is a provider of a fully integrated line of telecommunications information products used by carriers and systems integrators to support billing, bill auditing, network design, network routing and access applications.

Significantly, Telcordia’s challenge to the contract modifications in Amendment 57 to

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2 See, e.g., Amendment to Contractor Services Agreement for Number Portability Administration Center/Service Management System Extension and Modification between NeuStar, Inc. and the North American Portability Management LLC, as successor to the Northeast Carrier Acquisition Co., LLC, Amendment No. 57 (NE) (Sept. 21, 2006) (“Amendment 57”).
the Number Portability Administration Center ("NPAC") “Master Agreements” does not criticize NeuStar’s compliance with its rigorous neutrality requirements. Under the Master Agreements, NeuStar, as the local number portability administrator ("LNPA"), is required to be a “Neutral Third Party.” Telcordia, however, has not offered similar safeguards. According to the North American Portability Management LLC ("NAPM"), the industry consortium that oversees LNP administration, the NAPM requested specific confirmation of Telcordia’s qualifications as a “Neutral Third Party” as required by the Master Agreements and Federal Communications Commission orders. To date, Telcordia has not provided adequate evidence of its qualification as a Neutral Third Party.

3 See, e.g., Agreement for Number Portability Administration Center/Service Management System Between Lockheed Martin IMS and Northeast Carrier Acquisition Company, LLC (Nov. 7, 1997) ("Northeast Master Agreement").

4 See NeuStar, Inc. Prospectus at 61, 67, SEC Registration No. 333-123635 (June 28, 2005).

5 See, e.g., Northeast Master Agreement at Art. 1.30. The Master Agreements define Neutral Third Party as “…an entity which (i) is not a telecommunications carrier, as defined in the Communications Act of 1934 as amended; (ii) is not owned by, or does not own, any telecommunications carrier; provided that ownership interests of five percent (5%) or less shall not be considered ownership for purposes of this Article; or (iii) is not affiliated, by common ownership or otherwise, with a telecommunications carrier.” NAPM Comments at 14 n.20. The comments filed in response to the Petition will be cited in this abbreviated manner.

Moreover, in contrast to NeuStar Inc.’s provision of NPAC database services, Telcordia has never been required to adhere to neutrality standards in its management of the Local Exchange Routing Guide (“LERG”) and Terminating Point Master (“TPM”) database services. Because the North American Numbering Plan Administrator (“NANPA”) and Pooling Administrator (“PA”) both require access to the LERG to carry out their functions and because carriers must have access to the LERG to route calls, the Commission should ensure that provision of such a vital database management service be entrusted only to an entity that is a neutral third party.

CCMI requests that the Commission require that the administrators of all number and routing databases adhere to stringent neutrality requirements, as is the case with the NANPA, the PA, and the LNPA.

Respectfully submitted,

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7 See Administration of the North American Numbering Plan, 7 FCC Rcd 6837, 6839 (1992) (subsequent history omitted) (LERG enables local telephone companies and long distance carriers to route traffic).