December 12, 2012

Ex Parte

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

RE: Petition of Telcordia Technologies, Inc. to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration, and Petition of Telcordia Technologies, Inc. to Reform or Strike Amendment 70, to Institute a Competitive Bidding for Number Portability Administration, and to End the LLC’s Interim Role in Number Portability Administration Contract Management, WC Docket Nos. 07-149, 09-109

Telephone Number Portability, WC Docket No. 95-116

Dear Ms. Dortch:

On December 11, 2012, Colleen Boothby, of Levine, Blaszak, Block & Boothby, on behalf of IBM, and I, on behalf of Telcordia Technologies, Inc. (“Telcordia”) spoke by telephone with Neil Dellar of the Office of the General Counsel. We discussed the neutrality provisions of the LNPA RFP and how they should be applied to prime contractors and subcontractors. Specifically, we recommended that the neutrality provisions should apply to the LNPA (the prime contractor) and that the LNPA should be required to include in its Proposed Safeguards a process for monitoring any subcontractors to ensure their neutrality in the performance of the contract. Such an approach maintains accountability for neutrality with the LNPA, where it properly belongs, and recognizes that prescribing safeguards or other measures may be unnecessary or inappropriate for a subcontractor that has limited amounts of discretion that it is capable of exercising.
Please contact me if you have any questions. A copy of this letter is being filed in the above-captioned dockets.

Sincerely,

John T. Nakahata  
Counsel to Telcordia Technologies, Inc.

cc: Colleen Boothby (Levine, Blaszak, Block & Boothby)  
Neil Dellar  
William Dever  
Maureen Duignan  
Lisa Gelb  
Diane Griffin Holland  
Marilyn Jones  
Sean Lev  
Travis Litman  
Christopher Sova  
Ann Stevens  
Suzanne Tetreault  
Julie Veach  
Sanford Williams