December 10, 2014

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

Re: Notice of Ex Parte Presentations, CC Docket No. 95-116; WC Docket No. 07-149; WC Docket No. 09-109

Dear Ms. Dortch:


During the meeting the parties discussed issues relating to the national security, law enforcement, and public safety implications of the Local Number Portability Administrator (“LNPA”) selection process.

Neustar’s representatives discussed the points that they believed were now agreed between the parties, including the view that the security issues raised by Neustar concerning LEAP, the reuse of foreign LNPA code, and possible disruption of emergency communications systems (e.g., the Government Emergency Telecommunications Service and the Wireless Priority Service) all require mitigation, and that federal procurement law is a source of guidance for the competition. Neustar discussed current areas of disagreement with Ericsson, expressing views that the RFP fails to contain ‘robust’ security measures, that the Committee on Foreign Investment in the U.S. (“CFIUS”) review process does not sufficiently address security concerns in the LNPA selection process, that the LEAP transition will be met with disruption or degradation of service, and that the national security gaps in the RFP cannot be fixed in a post-
selection environment. Neustar further expressed that multiple public safety, law enforcement, and national security stakeholders, including the Departments of Homeland Security and Defense, law enforcement, and the PSAP community, must be accommodated by revisions to the RFP and expressed the importance of a competition that offers both contestants an opportunity to fairly compete on security.

Pursuant to Section 1.1206(b) of the Commission’s rules, I am filing this notice electronically in the above-referenced dockets. Please contact me directly with any questions.

Respectfully submitted,

/s/ Stewart Baker

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