February 13, 2015

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:

On Wednesday, February 11, 2015, Neustar, Inc. (“Neustar”) counsel Aaron Panner of Kellogg, Huber, Hansen, Todd, Evans & Figel PLLC; Michael Sussmann of Perkins Coie LLP; and Michele Farquhar and Thomas McGovern of Hogan Lovells; together with Cheryl Smith, Principal of Smith & Associates (“S&A”), met with Admiral David Simpson, Kenneth Moran, and Allan Manuel of the Public Safety and Homeland Security Bureau; Lisa Gelb and Sanford Williams of the Wireline Competition Bureau; and Neil Dellar of the Office of General Counsel, to discuss the technical viability of proposals submitted in response to the Commission’s Request for Proposals for a Local Number Portability Administrator (“LNPA”). Neustar maintains the Commission must conduct a comparison of the proposals that includes all costs associated with the proposals, including transition costs, to be able to make a fully informed selection.1

Ms. Smith presented the results of a technical evaluation prepared by S&A, filed with the Commission on January 28, 2015, comparing Neustar’s proposal to the proposal submitted by Telcordia Technologies, Inc., an Ericsson Inc. subsidiary doing business as iconectiv (“iconectiv”). First, Ms. Smith described her background and explained the assessment approach and methodology that S&A used for its report. Ms. Smith then provided an overview of her findings, as set forth in the attached summary, noting that iconectiv’s proposal presented serious technical deficiencies, unmitigated transition risks, and likely transition delays, even in a best case scenario. Ms. Smith reported that S&A found that iconectiv’s proposed system – including the approach of writing new software “from scratch” – was not technically equivalent to the current system and would not advance the state of the art.

1 Given the importance of the LNPA selection being contemplated by the Commission, transition costs estimated at over $1 billion are anything but “irrelevant” despite the claims of the largest carriers to the contrary. See Letter from B. Lynn Follansbee, Vice President, Law & Policy, USTelecom to Marlene Dortch, Secretary, FCC, CC Docket No. 95-116, WC Docket No. 09-109 (Feb. 4, 2015).
Ms. Smith highlighted the transition risks and delays associated with the iconectiv proposal, including the unrealistic development timetable, failure to meaningfully address the necessary development, testing, or implementation efforts, and the lack of a true risk profile. S&A found that a successful transition of such a complex system will take 3-4 years – most of the contract award period. Ms. Smith added that such an extended timeframe requires an impact assessment, especially of how these risks and delays could have a disruptive impact on both consumers and service providers. Finally, Ms. Smith noted that iconectiv will not advance the state of the art, so in the best case the current system will be replicated after considerable delay. As a result, any additional functionality will need to be postponed, including to support the IP transition.

Immediately following this presentation, Neustar representatives Steve Edwards, Senior Vice President; Bill Reidway, Vice President; and Scott Deutchman, Deputy General Counsel, joined the meeting. Neustar discussed the attached slide regarding fundamentals and best practices for the continued availability of numbering services, including local number portability implementation. Specifically, Neustar described three distinct activities: (1) functional, performance, and security testing of the NPAC and surrounding services; (2) establishing and verifying industry connectivity, certifying connected platforms, and testing business scenarios in conjunction with service providers; and (3) preserving the data integrity for the NPAC’s authoritative data in production, including the development of back-out/fall-back plans to account for possible errors. Neustar stressed the importance of treating the three activities separately, as a means to detect and resolve errors efficiently, and to best protect operators and consumers from deployment risks. Neustar added that the common practice of deploying and monitoring one region first for a fixed time period before implementing any new system in additional regions mitigates risks and minimizes service disruption to consumers, operators, public safety, and other constituents. Finally, Neustar noted that the use of a third party expert to monitor and be accountable for transition could help to address some of the potential problems with any potential transition.

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/ Michele Farquhar

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cc: Adm. David Simpson  
    Kenneth Moran  
    Allan Manuel  
    Lisa Gelb  
    Sanford Williams  
    Neil Dellar
Technical Evaluation of the Next Generation NPAC/SMS Proposals

Report on Findings

Cheryl Smith
Daniel Crespo-Dubie

February 11, 2015

Summary of Findings

• Due to ambiguities in iconectiv proposal, we assessed proposal’s dual approaches (“build” and “buy”)
  • With both approaches, significant issues discovered
    – Missing major milestones (system development/modification)
    – Flawed transition strategy
  • Given enough time and resources anything can be accomplished, but current overall assessment of iconectiv proposal is ‘high risk’
  • Successful transition will take 3-4 years—most of the contract award period
  • Extended transition timeframe requires impact assessment
    – On progress in wireless industry
    – On consumers
    – On service providers
    – On other companies and agencies involved

Feb. 11. 2015
Following industry readiness, successful deployment relies upon maintaining data integrity of routing/addressing information, historical and in-flight transactions, service provider configurations, and reference data, along with back-out plans to account for severe errors encountered in production. To mitigate risks nationally, one region is deployed first and monitored for a fixed period prior to others.

Success criteria: no service disruption to consumers, operators, or other constituents.