November 20, 2014

Electronically Filed

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

Re: 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, CC Docket No. 95-116.

Dear Ms. Dortch:

On November 18, 2014, Michael Altschul (of CTIA-The Wireless Association), B. Lynn Follansbee (of U.S. Telecom Association), William Brown (of AT&T Services, Inc.), Indra Chalk (of T-Mobile), Tiki Gaugler (of XO Communications), Jeff Lanning (of CenturyLink), Charles McKee (of Sprint), Ann Berkowitz and Chris Miller (of Verizon), and I met with Federal Communications Commission staff Myrna Freeman, Heather Hendrickson, Michelle Sclater, and Ann Stevens of the Wireline Competition Bureau (“WCB”) and with Nick Bourne, Terry Cavanaugh, and Neil Dellar of the Office of General Counsel (“OGC”). Commission staff Sanford Williams of WCB and Marcus Maher of OGC also participated in the meeting by phone.

CTIA, USTelecom, and the other industry stakeholders said that it is critical for the Commission to take action now and approve the North American Numbering Counsel’s (“NANC”) recommendation for the next Local Number Portability Administrator (“LNPA”). The recommendation has been pending approval from the Commission for nearly seven months, and while the industry group appreciates the Commission’s careful review and analysis of the record, the delay cannot continue.

In particular, we explained the enormous cost—ultimately borne by consumers—of further delay, due to escalation clauses in the incumbent Administrator’s contract. As CTIA and USTelecom noted in their filed comments in this proceeding, any extension of the current LNPA...
contract beyond its scheduled June 2015 expiration will automatically trigger a price escalation clause and will cost consumers over $40 million per month. See Comments of CTIA & U.S. Telecom Association at 20-21; see also Reply Comments of CTIA & U.S. Telecom Association at 7-8. We also discussed the strong industry consensus across a broad spectrum of stakeholders in favor of the NANC recommendation, emphasizing that large and small service providers have participated throughout the LNPA selection process and support immediate Commission action to approve selection of the next LNPA. We urged the Commission to act by year-end (2014) to allow all impacted providers’ business and technical units to proceed with the necessary logistical planning for a seamless and timely transition in order to prevent an avoidable, new cost of more than $1 million per day from being passed on to the American public.

We also stressed the transparency and integrity maintained during the selection process to date—including the extraordinary opportunity for public participation, as reflected in the Commission’s Public Notices calling for additional comments. While Neustar had ample opportunity to suggest or request modifications to any aspect of the selection process during the time for public comment, it did not do so until well after vendor responses were submitted. We noted it is telling that Neustar’s questions and concerns about the selection process arose only after Neustar believed it would not be the recommended vendor.

If you have any questions concerning this matter, please feel free to contact me at (202) 973-4256.

Sincerely,

/s/

Peter Karanjia
Counsel for CTIA-The Wireless Association

cc: Nick Bourne
    Terry Cavanaugh
    Neil Dellar
    Myrna Freeman
    Heather Hendrickson
    Marcus Maher
    Michelle Sclater
    Ann Stevens
    Sanford Williams

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CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2014, true and correct copies of the foregoing Ex Parte Letters to Ms. Marlene H. Dortch, dated November 20, 2014, were sent by electronic mail and by U.S. Postal Service, postage prepaid, to the following parties to the proceeding:

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