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## Statement by Neustar, Inc. on the LNPA Vendor Selection

Mar 4, 2015

Sterling, Virginia -- Based on the information made available today regarding the Local Number Portability Administrator (“LNPA”) vendor selection, the FCC staff has recommended that the full Commission adopt a draft order that could have widespread and long-lasting negative consequences for consumers, competition, and national security.

The draft order is before the Commissioners, who are now charged with accepting, rejecting, or modifying the FCC staff’s recommendation for an Order in the LNPA vendor selection process. Neustar is extremely disappointed that the Wireline Competition Bureau is calling for action when, in its fact sheet, the staff has profoundly underestimated the breadth of the LNPA’s responsibilities. Although apparently the LNPA is used to port numbers, it is also critical for technology migrations, mergers and acquisitions, disaster recovery, accurate 911 location, and is the only authoritative database for the proper call completion of 11 billion voice calls and text messages each day. The recommendation misunderstands the operating system and would harm public safety, law enforcement, fundamentally burden small carriers, and disrupt service for 12 million consumers – all in pursuit of theoretical savings for a few carriers, which Neustar believes will be dwarfed by the costs and risks of transition.

There has been no independent evaluation of the total costs of creating a new telephone numbering system from scratch, versus keeping the system that works flawlessly today. The FCC has not ensured that a new telephone numbering system will maintain 911, law enforcement, public safety, cyber security, and disaster recovery capabilities, which experts say was overlooked in the RFP process. The FCC has not set out a plan, nor who is accountable for structuring and overseeing a transition to a new system. There does not appear to have been an evaluation of the impact of a new numbering system -- as well as the distribution of the costs needed to build, test, and transition to it -- on number portability, carrier competition and the prices and choices available to consumers and businesses. In short, there is much work left to be completed before the Commission can act on a matter of such importance to the American people.

The LNPA vendor selection process has been botched procedurally. Awarding the contract to manage an essential U.S. telecommunications infrastructure to a foreign manufacturing and telecommunications concern that is not neutral and has substantial commercial arrangements with certain telecommunications carriers would compound the significant errors made in a process that has violated the Federal Advisory Committee Act and the

Administrative Procedures Act. Neustar will continue to raise important questions about this process, and will review all of its options.

About Neustar:

Neustar, Inc. (NYSE:NSR) is the first real-time provider of cloud-based information services and data analytics, enabling marketing and IT security professionals to promote and protect their businesses. With a commitment to privacy and neutrality, Neustar operates complex data registries and uses its expertise to deliver actionable, data-driven insights that help clients make high-value business decisions in real time, one customer interaction at a time. More information is available at [www.neustar.biz](http://www.neustar.biz).