



Federal Communications Commission  
Washington, D.C. 20554

February 4, 2008

Mr. Thomas M. Koutsky  
Chair, North American Numbering Council  
c/o Phoenix Center for Advanced Legal and Economic Public Policy Studies  
5335 Wisconsin Avenue, NW  
Suite 440  
Washington, D.C. 20015

Dear Mr. Koutsky:

In 2004, NeuStar presented Change Order 400 to the Local Number Portability Administration (LNPA) Working Group. Change Order 400 proposes to add four new fields to each ported and pooled telephone number record in the Number Portability Administration Center (NPAC) database. Its purpose is to facilitate more efficient routing of calls to numbers that have been pooled or ported from one carrier to another.

In 2005, the Commission directed the North American Portability Management (NAPM) LLC to hold in abeyance Change Order 400, until it had a chance to consider the implications of the proposed change. To assist the Commission in this consideration, the Commission asked the North American Numbering Council (NANC) to identify and analyze the policy, regulatory, and consumer issues associated with the proposed change. The NANC directed the Future of Numbering Working Group (FoNWG) to conduct the requested review.

Neither the FoNWG nor the NANC was able to reach a consensus recommendation with respect to Change Order 400. The Commission recently adopted an order which took a number of steps designed to ensure the benefits of local number portability. In light of that order, the industry may reconsider Change Order 400 rather than continue to hold in abeyance its consideration.

Mr. Thomas M. Koutsky  
Phoenix Center for Advanced Legal and  
Economic Public Policy Studies  
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Please let me know if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dana R. Shaffer', with a long horizontal line extending to the right.

Dana R. Shaffer  
Chief  
Wireline Competition Bureau

Cc: Julie Veach, Deputy Chief, Wireline Competition Bureau, Room 5-C450  
Amy Bender, Legal Counsel, Wireline Competition Bureau, Room 5-C360  
Ann Stevens, Deputy Chief, Competition Policy Division, Wireline  
Competition Bureau, Room 5-C162  
Marilyn Jones, Designated Federal Officer to the NANC, Wireline Competition  
Bureau, Room 5-C264  
Melvin Clay, AT&T, Co-Chair, NAPM LLC  
Timothy Decker, Verizon Communications, Co-Chair, NAPM LLC