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January 7, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication, GN Docket No. 10-127; GN Docket No. 14-28

Dear Ms. Dortch:

On January 6, 2015, Brendan Kasper, Senior Regulatory Counsel of Vonage Holdings Corp. (“Vonage”), along with Gary Slaiman and the undersigned of Morgan, Lewis & Bockius LLP, as outside counsel to Vonage, met with Gigi B. Sohn, Special Counsel for External Affairs and Daniel Alvarez, Legal Advisor from the Office of Chairman Tom Wheeler and Eric Feigenbaum, Director of Outreach & Strategy in the Office of Media Relations.

The meeting participants discussed the positions Vonage advocated in its previously filings in the above referenced dockets. Specifically, Vonage emphasized its support for a Title II approach as well its views that there is sufficient factual and legal support for the Commission to apply similar network neutrality rules on both wireline and wireless providers. Vonage reiterated its views that there should be a presumption against paid prioritization, but that such a presumption could be overcome where a provider obtains the prior consent of the Commission by demonstrating that such conduct would be in the public interest. Vonage also stated that should the Commission undertake a reclassification under Title II that it should not forebear from Sections 201, 202 and 208. Vonage also supports the positions advanced by Google in its December 30, 2014 filing regarding the inappropriateness of forbearing from Section 224.

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Respectfully submitted,

/s/ William B. Wilhelm

William B. Wilhelm

cc: Gigi B. Sohn
Daniel Alvarez
Eric Feigenbaum