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January 14, 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 12, 2015, Brendan Kasper, Senior Regulatory Counsel of Vonage Holdings Corp. (“Vonage”), along with William B. Wilhelm and the undersigned of Morgan, Lewis & Bockius LLP, as outside counsel to Vonage, met with Amy Bender, Legal Advisor in the Office of Commissioner Michael O’Rielly.

Vonage discussed its positions advocated in its previous filings in the above referenced dockets. Specifically, Vonage emphasized its support for re-adoption of the Commission’s 2010 Open Internet rules except grounded in the Commission’s legal authority pursuant to Title II of the Communications Act. In addition, Vonage reiterated its view 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. Vonage also explained its view that there is sufficient factual and legal support for the Commission to apply similar network neutrality rules on both wireline and wireless providers.

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Respectfully submitted,

/s/ Joshua M. Bobeck

Joshua M. Bobeck
Counsel to Vonage Holdings Corp.

cc: A. Bender
 B. Kasper
 W. Wilhelm