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February 27, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-5-A325
Washington, DC 20554

Re: Special Access Data Collection, WC Docket No. 05-25; RM-10593

Dear Secretary Dortch,

On behalf of Vonage Holdings Corp. ("Vonage"), FRN 0018401844, and the Subsidiary identified in its February 27, 2015 holding company letter, enclosed for filing, in accordance with the Order and Data Collection Protective Order¹, are the non-confidential version of responses to essay questions as part of the special access mandatory data collection. The Highly Confidential version of the essay responses and the Highly Confidential data container have been submitted via the Commission's Special Access Web Portal.

Please direct any questions to Brendan Kasper of Vonage at (732) 444-2216, or to the undersigned.

Sincerely,

/s/ Tamar E. Finn

Tamar E. Finn
Counsel to Vonage Holdings Corp.

cc: Brendan Kasper

¹ In the Matter of Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593, Order and Data Collection Protective Order, Appendix A, para.3, DA 14-1424, (rel. Oct. 1, 2014).

Telesphere Networks Ltd.

Question: II.F.8

Terms and Conditions Constraints

ANSWER:

Telesphere is not providing an answer to this optional question.

Telesphere Networks Ltd.

Question: II.F.9

Changing Transport Providers

ANSWER:

Telesphere is not providing an answer to this optional question.

Telesphere Networks Ltd.

Question: II.F.10

Purchases Solely for the Purpose of Meeting a Prior Purchase-Based Commitment

ANSWER:

Telesphere is not providing an answer to this optional question.

Telesphere Networks Ltd.

Question: II.F.12

Paying One Month Term Only Rates

ANSWER:

Telesphere is not providing an answer to this optional question.

Telesphere Networks Ltd.

Explanatory Attachment

Vonage Holdings Corp. closed the transaction to purchase Telesphere Networks Ltd. on December 16, 2014. Although the companies listed in table II.A.1 are affiliates as of the filing date, they were not affiliated with Telesphere Networks Ltd. in 2013.