



# Public Knowledge

June 4, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington DC 20554

**Re: Notice of Ex Parte Communications, WC Docket Nos. 13-97, 07-243, 07-149, 09-109, 04-36, 10-90  
CC Docket Nos. 01-92, 99-200, 95-116**

Dear Ms. Dortch:

On June 2, 2015, Harold Feld, Senior Vice President of Public Knowledge, and Kate Forscey, Associate Counsel for Government Affairs, Public Knowledge, met with Daniel Alvarez, Wireline Legal Advisor for Office of the Chairman, and Chris Laughman, Law Clerk for the Chairman's office, with regard to the above captioned proceedings. PK met separately with Rebekah Goodheart, Wireline Legal Advisor for the Office of Commissioner Clyburn, and Sarah Papadelias, Law Clerk for Commission Clyburn's Office.

Public Knowledge argued the Commission should not grant NANP numbers to non-Title II entities. Given potential concerns over the ability of the Commission to regulate VOIP providers under ancillary authority, the Commission cannot properly ensure that non-Title II entities will behave in a responsible manner with the numbering resource, or that the Commission can require VOIP providers to adequately serve the public interest and convenience.

Public Knowledge also expressed concern that providing direct access to VOIP numbers may have cybersecurity consequences. Telephone numbers are the proverbial "key to the kingdom" for the traditional international telephone system. Currently, they are distributed only to "trusted entities," certified at both the state and federal level. VOIP providers have no credentialing requirement or requirement to maintain any physical assets in the United States. Direct allocation of numbers to VOIP providers has the potential to hand authorized phone number blocks to entities outside the jurisdiction of United States law enforcement.

Public Knowledge also noted that any changes in the numbering allocation may require changes in the requirements for the LNP database, and therefore may have impact on the ongoing transition of the LNPA contract.

Public Knowledge, 1818 N Street NW, Suite 410, Washington DC 20036



Finally, Public Knowledge wants to ensure the Commission emphasize that nothing in the item will interfere in the Commission's obligations to the international community to maintain number standards under the North American Number Plan and the 1988 ITRs.

In accordance with Section 1.1206(b) of the Commission's rules, this letter is being filed with your office. If you have any further questions, please contact me at (202) 861-0020.

Respectfully submitted,

/s/ Harold Feld  
Senior Vice President  
PUBLIC KNOWLEDGE

cc: Daniel Alvarez  
Rebekah Goodheart  
Sarah Papadelias  
Chris Laughman