

June 5, 2015

**Ex Parte**

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

Re: *Numbering Policies for Modern Communications*, WC Docket No. 13-97; *IP-Enabled Services*, WC Docket No. 04-36; *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243; *Telephone Number Portability*, CC Docket No. 95-116; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *Numbering Resource Optimization*, CC Docket No. 99-200

Dear Ms. Dortch:

On June 3, 2015, I spoke with Pamela Arluk, Chief, Pricing Policy Division, Wireline Competition Bureau. In that conversation, I stated that it is important that the Commission, as it moves forward to provide direct access to NANP numbers for VoIP providers, also make conforming changes with respect to the VoIP Symmetry Rule. The Commission already confirmed that the CLEC may assess end office local switching when it is the party listed in the NPAC database as providing the calling party or dialed number. *See Connect America Fund; Developing a Unified Intercarrier Compensation Regime*, Declaratory Ruling, FCC 15-14, 30 FCC Rcd. 1587 (2015). There is no reason with direct access for VoIP providers to differentiate the intercarrier compensation that a CLEC can charge when it, together with its VoIP partner, provides the functional equivalent of end office local switching based upon whether the CLEC or the VoIP partner is the party listed in the Number Portability Administration Center database as providing the number of the calling party or dialed number.

Please contact me if you have any questions.

Sincerely



John T. Nakahata  
Counsel to Level 3 Communications, LLC

cc: Pamela Arluk