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June 8, 2015

Ex Parte

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

Dear Ms. Dortch:

On Thursday, June 4, 2015, Robert Morse and the undersigned of Verizon met with Nicholas Degani, Legal Advisor, and Christine Bealer, intern, to Commissioner Ajit Pai to discuss issues in the above proceedings.

We urged the Commission to initiate a further notice of proposed rulemaking to examine the cost allocation rules for numbering administration, portability and pooling, consistent with our prior comments.¹ The current revenue-based allocation method, adopted in 1998 at the early stage of local number portability, was not intended to be permanent. Seventeen years later the industry has evolved far from the early stages of local number portability, and the current method no longer meets the statutory requirement that number portability costs “be borne by all telecommunications carriers on a competitively neutral basis”²

We pointed out that this issue has been under consideration at the Commission for nearly a decade, beginning with the 2005 Bellsouth Petition for Rulemaking, and more recently in the 2013 *Notice of Proposed Rulemaking*.³ Issuing a Further Notice of Proposed Rulemaking to seek comment on the differing viewpoints that have already been submitted in the record would be an appropriate next step. Additional intervening steps, such as referring the issue to the North

¹ See Comments of Verizon and Verizon Wireless, WC Docket No. 13-97 et al., at 4-7 (July 19, 2013); Verizon and Verizon Wireless Petition for Declaratory Ruling, WC Docket No. 11-95 (May 31, 2011).

² 47 U.S.C. § 251(e)(2).

³ Bellsouth Corporation, Petition for Rulemaking, RM-11299 (Nov. 3, 2005); *Numbering Policies for Modern Communications*, Notice of Proposed Rulemaking, Order and Notice of Inquiry, 28 FCC Rcd 5842, ¶¶ 66-69 (2013).

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American Numbering Council or another third party for further consideration, would unnecessarily delay final action.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Burko". The signature is fluid and cursive, with the first name "Andrew" written in a larger, more prominent script than the last name "Burko".

cc: Nicholas Degani
Christine Bealer