



June 10, 2015

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
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 Service Providers*, WC Docket No.07-243; *Numbering Resource Optimization*, CC Docket No. 99-200

Dear Ms. Dortch:

On June 8, 2015, Edward Mulligan, Vice President of Carrier Operations, and Brendan Kasper, Senior Regulatory Counsel, both of Vonage Holdings Corporation (“Vonage”), and Anne Langer and I, both of Harris, Wiltshire, & Grannis, LLP, met separately with Travis Litman, Legal Advisor to Commissioner Rosenworcel; Rebekah Goodheart, Legal Advisor, and Sarah Papadelias, intern, to Commissioner Clyburn; Amy Bender, Legal Advisor, and Trip Nastico, intern, to Commissioner O’Rielly; Nicholas Degani, Legal Advisor, and Christine Bealer, intern, to Commissioner Pai; and Daniel Alvarez, Legal Advisor to Chairman Wheeler. On that date, I also had a telephone conversation with Randy Clarke of the Wireline Competition Bureau. On June 9, 2015, Mr. Kasper, Ms. Langer, and I spoke via telephone with Mr. Clarke, Ann Stevens, Marilyn Jones, and Melissa Kirkel, all of the Wireline Competition Bureau. On that date, I also left a voicemail for Mr. Clarke. The content of these conversations is summarized below.

Vonage is pleased that the Commission is considering rules granting qualified interconnected VoIP providers direct access to numbers. This is an important step that will enable IP interconnection, increase transparency and parity in the telecommunications industry, improve call quality, reduce cost, and allow deployment of new and innovative services. Over the course of the last two years, the Commission has developed an extensive record of the benefits of direct access to numbering, including concrete data from the recent numbering trial. Vonage urges the Commission to adopt its rules expeditiously and remove any barriers that would further delay qualified interconnected VoIP providers’ direct access to numbers.

Vonage noted that even the limited access to numbers provided during the numbering access trial has spurred IP interconnection. Vonage has entered into agreements with wireless, wireline, and cable providers for the direct exchange of traffic in IP. Unfortunately, Vonage’s ability to exchange traffic pursuant to these agreements is limited because Vonage does not have direct access to numbers. Without direct access, Vonage does not appear in the Local Exchange

Routing Guide or the Local Number Portability databases as the provider associated with its customers' phone numbers, which prevents the direct routing necessary for direct IP traffic exchange. Granting direct access will enable this routing, removing an unnecessary barrier to deployment of IP networks and the benefits they deliver.

Second, as expected, the recent numbering trial proved that direct access to numbering provides numerous customer benefits without the disastrous consequences that some commentators predicted.¹ Once it had access to numbers, Vonage entered interconnection agreements with IP partners and was able to send traffic without going through a third party to convert the traffic from IP to TDM. This lack of conversion increased call quality and lowered costs.

Third, direct access to numbering increases network redundancy. As Vonage gains access to more numbers, it will be able to increase its IP interconnection agreements and create an alternative, redundant transmission path that will exist alongside Vonage's PSTN interconnects. The increased redundancy will provide greater protection against customers losing service.

Vonage also urged the Commission to move expeditiously to enable direct access by qualified interconnected VoIP providers. Vonage noted that it would not be possible for there to be a "flash cut" to numbering access, as providers must complete authorization and numbering ordering processes before receiving direct access to numbers.² There is no need for the Commission to impose a longer transition period.

Vonage further urged the Commission to consider extending direct access to existing numbering trial participants in the interim period between Commission action and the effective date of any new rules. The Commission has taken a similar step in the IP CTS context, where it extended the effective date of interim rules pending the effective date of newly adopted IP CTS rules.³ Here, to avoid unnecessarily delaying the benefits of IP interconnection, the Commission should extend the limited waiver it granted to enable the numbering trial to allow trial participants access to additional numbers pending the effective date of the Commission's new rules provided that they accept any requirements for direct access adopted by the Commission. Doing so would be consistent with the policy goals and public interest underlying those new rules, and would further the public interest by avoiding unrelated and unnecessary delay.

¹ See Comments filed by Bandwidth.com, Inc., WC Dkt. Nos. 13-97, 04-36, 07-243, & 10-90 and CC Dkt. Nos. 95-116, 01-92, 99-200 (filed Aug. 19, 2013).

² See Numbering Resources: Central Office Code Expedite Process, http://www.nanpa.com/number_resource_info/co_expedite.html (last accessed June 10, 2015); see also 47 C.F.R. § 52.15(g).

³ Cf. *Misuse of Internet Protocol (IP) Captioned Telephone Service*, Report and Order and FNPRM, FCC No. 13-118, 28 FCC Rcd. 13420, 13472 ¶¶ 109-10 (2013) (extending the *IP CTS Interim Order* until the effective date of the final rule in order to ensure Commission policy goals remain in effect during the pendency of PRA approval).

What is more, as an interconnected VoIP provider, Vonage is already contributing to the NANPA and LNP funds and will continue to do so. Vonage understands that providers are currently petitioning the Commission to change the number cost allocation method.⁴ Vonage takes no position on this issue except to state that the cost allocation issue should not delay any order granting numbering resources.

Finally, Vonage agrees that any provider with direct access to numbering resources should be treated on parity with other providers. To ensure parity with others who granted direct access, Vonage believes it would be reasonable to require an interconnected VoIP provider seeking numbering access to certify that it is an interconnected VoIP provider subject to the Commission's interconnected VoIP rules and the rules and requirements governing numbering resources. Such a certification, coupled with an authorization process for direct access and the Commission's plenary authority over numbering resources pursuant to Section 251(e), would enable the Commission to enforce any obligations it imposes on interconnected VoIP providers.

Vonage commends the Commission and the Bureau for its work in this matter and urges the Commission to move forward expeditiously.

Sincerely,



Brita D. Strandberg
Counsel to Vonage Holdings Corporation

cc:

Travis Litman
Rebekah Goodheart
Amy Bender
Nicholas Degani
Daniel Alvarez
Randy Clarke
Ann Stevens
Marilyn Jones
Melissa Kirkel

⁴ See Letter from Ann D. Berkowitz, Counsel, Verizon, to Marlene H. Dortch, Secretary, Fed. Comm'n Comm'n, WC Dkt. No. 13-97 (June 8, 2015).