

June 11, 2015

*Submitted via ECFS*

Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

**Re: Ex Parte Submission, WC Docket Nos. 13-97, 13-39, 04-36, 07-243, 07-149, 09-109 & 10-90;  
CC Docket Nos. 01-92, 99-200 & 95-116; CG Docket NO. 02-278; GN Docket Nos. 12-353 &  
13-5**

Dear Ms. Dortch:

The purpose of this letter is to express support, on behalf of SmartEdgeNet LLC, dba Edge Communications ("SEN"), for a proposal included in an *ex parte* submission in the above-noted matters made on behalf of Vonage Holdings Corporation.<sup>1</sup> Vonage suggests that the Commission should:

consider extending direct access to existing numbering trial participants in the interim period between Commission action and the effective date of any new rules. ... 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.

Vonage Letter at 2. If the Commission has concluded that the public interest is served by permitting interconnected VoIP providers to have direct access to numbering resources under reasonable conditions – as it should – then the Commission should also take prudent steps to expedite the ability of those providers to move forward in obtaining such access. Specifically, SEN suggests the following steps:

- **First**, as Vonage suggests, all interconnected VoIP providers who participated in the trial should have their waivers extended, pending the effective date of the new rules, to give them access to additional numbers, as long as they accept any new requirements for such access the Commission now adopts.
- **Second**, with respect to interconnected VoIP providers that have pending waiver requests, the Commission should indicate that such it will expeditiously review and grant such requests if such

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<sup>1</sup> Letter from B. Strandberg (Harris Wiltshire & Grannis) to M. Dortch dated June 10, 2015 in dockets noted above (Vonage Letter).

providers renew their request, and as long as in their request for renewal, they accept any new requirements for access to numbers the Commission establishes.<sup>2</sup>

- **Third**, the Commission should state that it will entertain and expeditiously grant new waiver requests filed between the issuance of the order and the effectiveness of the new rules, again as long as the interconnected VoIP provider requesting the waiver accepts any the requirements for access to numbering resources contained in the order.

Extending, granting, and expediting waivers while the general effectiveness of the new regime to be adopted in the order is pending would serve the public interest for all the same reasons, discussed extensively in the record, that it granting interconnected VoIP providers access to numbering resources serves the public interest in the first place.

Respectfully submitted,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read 'Chris W. Savage', with a stylized flourish at the end.

Christopher W. Savage

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<sup>2</sup> Alternatively, the Commission could grant pending waiver requests in its order, but condition that grant on a further filing by the affected entities affirmatively stating that they will abide by the Commission's new conditions on access to numbering resources.