



June 11, 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 11, 2015, on behalf of Vonage Holdings Corporation (“Vonage”), I spoke with Daniel Alvarez, Legal Advisor to Chairman Wheeler; Travis Litman, Legal Advisor to Commissioner Rosenworcel; and Amy Bender, Legal Advisor to Commissioner O’Rielly. During those conversations, I explained Vonage’s concern that the Paperwork Reduction Act (“PRA”) review may unnecessarily delay direct access to numbers and, more importantly, the innovation, IP interconnection, and consumer benefits that direct access will deliver.

The Commission has already granted a limited waiver of Section 52.15(g)(2)(i) to permit Vonage and other requesting interconnected VoIP providers to obtain direct access to numbers in order to enable a trial of direct access.<sup>1</sup> The Bureau reviewed the results of that trial and found no technical obstacles to direct access.<sup>2</sup> The Commission is now poised to authorize interconnected VoIP providers to obtain numbers directly.<sup>3</sup> To further its policy goal of enabling direct access to numbers, the Commission should simultaneously expand the existing waiver of Section 52.15(g)(2)(i) for Vonage and other numbering trial participants to permit them to request numbering resources directly pending the effective date of the newly-adopted authorization process, provided they voluntarily comply with all requirements the Commission adopts in its Order. Taking this step will permit entities like Vonage to voluntarily seek numbering access in a manner that is consistent with the public interest as found by the Commission, and will speed the benefits of direct access.

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<sup>1</sup> *In the Matter of Numbering Policies for Modern Commc'ns*, FCC No. 13-51, 28 FCC Rcd. 5842, 5880 ¶ 94 (2013).

<sup>2</sup> *In the Matter of Numbering Policies for Modern Commc'ns*, DA No. 14-118, 29 FCC Rcd. 927, 937 ¶ 28 (2014).

<sup>3</sup> Commission Meeting Agenda (June 11, 2015).

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To the extent that the Commission is concerned that other entities may likewise seek interim access, the Commission may make clear that other entities are free to renew existing waiver requests or file new waiver requests seeking similar relief. Because the Commission would not have the record of compliance and the demonstrated interest in direct access established by the numbering trial with respect to these entities, it would be appropriate to require non-trial participants to affirmatively request interim relief rather than extending the existing waiver to additional parties.

Finally, Vonage commends the Commission and the Bureau for its work in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'BDSB', with a long horizontal line extending to the right.

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