



August 3, 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:

Vonage is pleased that the Commission adopted its Report and Order granting direct numbering rights to interconnected VoIP providers.¹ As the Commission found, direct access to numbers will “facilitate innovative technologies and services that will benefit both consumers and providers, and further the Commission’s recognized pro-consumer, pro-competition, and public safety goals.”²

Though most of the Commission’s new rules take effect upon publication in the Federal Register, key provisions—Sections 52.15(g)(2)-(g)(3), which set forth the requirements for providers seeking initial numbering resources—require approval by OMB before they take effect. To further the Commission’s policy goals by swiftly enabling direct access to numbers, Vonage therefore asks the Commission to expand its existing limited waiver (which was granted as part of the Commission’s numbering trial) to allow Vonage to request numbering resources directly while OMB approval of the newly-adopted authorization process is pending, provided Vonage voluntarily complies with the numbering authorization requirements adopted in the Order and voluntarily provides the Commission with an application in the form required by the Commission’s newly-adopted rules.³ Taking this step will provide Vonage the opportunity to swiftly deploy numbers, thereby delivering the public interest benefits the Commission identified in its Order.⁴

¹ *In the Matter of Numbering Policies for Modern Commc'ns*, FCC 15-70 (rel. June 22, 2015) (“Order”).

² *Id.* ¶2.

³ Vonage has attached its application to this request.

⁴ Vonage encourages the Commission to provide similar relief to other providers that agree to comply with the Commission’s pending rules.

The Commission has taken a similar step in other contexts. For instance, in the IP CTS context, it extended the effective date of interim rules pending the effective date of newly adopted IP CTS rules.⁵ It did so to ensure that the Commission's policy goals remained in effect while OMB approval was pending.⁶ Similarly, in the context of annual reporting requirements for ETCs, the Commission waived certain reporting requirements that had already been granted OMB approval, while awaiting OMB approval for new reporting requirements, to lessen confusion among filers.⁷

In both cases, the Commission found that the public interest would be best served by its action. Extending the current limited waiver would likewise be in the public interest. Indeed, all of the Commission's public interest rationales for adopting its new rules apply to an extension of the current limited waiver, including that granting direct access will "improve efficiencies, provide greater control over call routing, and enhance the quality of service provided to customers"⁸ as well as facilitate direct IP interconnection and accelerate broadband deployment.⁹ In turn, there is no public interest rationale that counsels against allowing interim access, as the Commission has found that access under its pending rules is in the public interest.

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 Vonage access to additional numbers pending the effective date of the Commission's new rules provided that Vonage accepts the 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 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

⁵ *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).

⁶ *Id.*

⁷ *Cf. Connect America Fund*, Order, 28 FCC Rcd. 8360, 8361 ¶ 4 (2013) (granting a limited waiver of annual reporting requirements to lessen confusion among filers).

⁸ Order ¶ 16.

⁹ *Id.* ¶ 18.

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