

June 17, 2016

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Re *Ensuring Continuity of 911 Communications*, PS Dkt. No. 14-174

Dear Ms. Dortch:

In response to questions from Commission staff, Vonage Holdings Corporation (“Vonage”) hereby provides the Commission with additional information concerning the availability back-up power solutions for Vonage analogue terminal adaptors, or ATAs.

As an initial matter, Vonage reiterates its view that solutions like Vonage’s Network Availability Number and Vonage’s Extensions application offer Vonage users the simplest and most meaningful access to back-up power for Vonage’s service.¹ Vonage noted that there are significant practical limits to providing back-up power for Vonage ATAs. The energy a Vonage ATA requires to operate depends on the model as demonstrated in the table below.

	Watts Consumed	
	Standby	Active
VDV21	3.5	6.6
VDV22/VDV23	3.4	6.5
HT802	1.6	2.6
HT701	1.6	2.5
MTA8328	1.7	2.8

Depending on the model of ATA used, a UPS would need to provide approximately 850 to 1850 watt-minutes of capacity for the ATA to function for 1 hour of call time and 7 hours of standby time, and approximately 2450 to 5350 watt-minutes of capacity for the ATA to function for 2 hours of call time and 22 hours of standby time.

¹ See Letter from Brita D. Strandberg, Counsel to Vonage Holdings Corporation, to Marlene H. Dortch, Secretary, FCC, Docket No. 14-174 (May 31, 2016).

Vonage noted that to its knowledge, there is not a commercially available, reasonably priced² AC UPS model that provides sufficient power to meet the Commission's backup power requirements³ for *all* Vonage ATA models. A Belkin Backup Unit similar to that offered by Frontier Communications⁴ is compatible with some – but not all – Vonage ATA models. However, it cannot provide sufficient power to meet the Commission's backup power requirements⁵ for all the ATA models with which it is compatible. While there are commercially available, reasonably priced DC UPS models that can supply the voltages necessary for all Vonage ATA models, customers must purchase an adapter cable to use the DC UPS with the ATA. Even with this additional purchase, this solution does not provide sufficient power to meet the Commission's backup power requirements.⁶ And each of these solutions only provides sufficient power to support the ATA. Customers would need to purchase additional UPS or batteries to power their modem, router, and any other CPE required for the Vonage ATA to provide uninterrupted voice service.

If you have any questions, please do not hesitate to contact the undersigned at (202) 730-1300 or bstrandberg@hwglaw.com or abowling@hwglaw.com.

Sincerely,



Brita D. Strandberg
Anne K. Bowling
Counsel to Vonage Holdings Corporation

² For these purposes, Vonage has used \$100 as the cut-off for a reasonably priced UPS, but notes that such pricing assumes consumers would be willing to pay the cost of approximately three months of Vonage service for this back-up device. Vonage is skeptical that consumers will believe the benefit of this partial and limited back-up solution is sufficient to warrant its cost.

³ 47 C.F.R. § 12.5(b)(2).

⁴ See Frontier, Belkin Battery Backup Unit (last accessed on June 14, 2016), <https://frontier.com/en/shop/phone/belkin-battery-backup-unit>. Frontier offers this battery to its customers below current market price. See https://www.amazon.com/Belkin-Battery-Backup-Revision-BU3DC001-12V/dp/B004RRFY5I?ie=UTF8&*Version*=1&*entries*=0 (last accessed on June 14, 2016).

⁵ 47 C.F.R. § 12.5(b)(2).

⁶ 47 C.F.R. § 12.5(b)(2).

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cc: Linda Pinto
Jerome Stanshine