



1200 18TH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.WILTSHIREGRANNIS.COM

ATTORNEYS AT LAW

October 1, 2010

Ex Parte

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

Re: *Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92*

Dear Ms. Dortch:

On September 30, 2010, Brendan Kasper, Senior Regulatory Counsel of Vonage Holdings Corp. (“Vonage”), and the undersigned of Wiltshire & Grannis LLP, met with Jay Atkinson, Daniel Ball, Randy Clarke, John Hunter, Albert Lewis, and Marcus Maher of the Wireline Competition Bureau to discuss intercarrier compensation reform.

Vonage first described its role in the intercarrier compensation ecosystem and expressed its support for the National Broadband Plan recommendation that the Commission reform intercarrier compensation by eliminating per-minute charges. Vonage next explained that it provides appropriate call-identifying information to its CLEC partners, and does not object to reforms designed to prevent phantom traffic by requiring providers to pass call-identifying information. Vonage also explained that it expects communications providers to increasingly migrate to IP-to-IP interconnection, and expects that this migration will result in substantial cost savings to providers and, ultimately, consumers. Finally, Vonage emphasized that consumers will benefit from any reforms that eliminate above-cost intercarrier compensation rates, as such reforms will free providers and innovators to design and offer lower-cost services, and services that reflect consumer need rather than constraints arising from the current intercarrier compensation regime.

If you have any questions or require any additional information, please do not hesitate to contact me at (202) 730-1346.

Respectfully submitted,

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

Brita D. Strandberg
Counsel for Vonage Holdings Corp.

cc: Jay Atkinson
Daniel Ball
Randy Clarke
John Hunter
Albert Lewis
Marcus Maher