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ATTORNEYS AT LAW

July 14, 2011

Marlene H. Dortch
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *The Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers*, PS Docket No. 11-82

Dear Ms. Dortch:

On July 12, 2011, on behalf of Vonage Holdings Corp., Brendan Kasper, Mike Mayernik, and Alistair Thompson, all of Vonage, Kristine Devine, of Wiltshire & Grannis LLP, and I met with Jeffery Goldthorp, Gregory Intocchia, and Vernon Mosley, all of the Public Safety and Homeland Security Bureau, to discuss the recent outage reporting NPRM.

Vonage discussed its concerns with the proposed thresholds for outage reporting in the NPRM, noting that because it is an over-the-top VoIP provider, its systems are designed to correct for deficiencies in the underlying networks over which its service travels. Vonage noted that its customers, for instance, will not perceive any loss of quality when packet loss is at 1 percent, or when latency is at 100 ms. Vonage recommended that, if the Commission believes reporting of Quality of Service (QoS) issues is necessary, the Commission set the reporting thresholds much higher than those proposed.

Vonage also expressed concern with the NPRM's proposal that VoIP providers be responsible for reporting outages on networks and facilities that are not within its control. As Vonage reiterated throughout the meeting, Vonage provides an over-the-top service and does not control certain facilities over which its service runs. Vonage also noted that it does not continuously monitor its customers' broadband connections and only knows of a QoS impairment to those connections when its customers attempt to place a call. Vonage noted that it does continuously monitor its own networks and systems.

Finally, Vonage described its network architecture, explaining how calls are transmitted from a customer's Vonage device over the customer's broadband connection to Vonage's routing servers, and from there to either another Vonage customer (again, over that customer's broadband connection) or over the PSTN (and perhaps also involving a broadband connection in the case of non-Vonage VoIP customers).

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: Jeffery Goldthorp
Gregory Intoccia
Vernon Mosley