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May 16, 2012

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

Re: *In the Matter of Petitions for Waiver of Commission's Rules
Regarding Access to Numbering Resources, CC Docket 99-200*

Dear Ms. Dortch:

On May 15, 2012, Erin Boone of Level 3 Communications, LLC, Greg Rogers of Bandwidth.com, Karen Reidy of COMPTTEL, and I ("CLEC Participants") met with Michael Steffen, Legal Advisor to Chairman Genachowski, Sharon Gillett, Bureau Chief, Wireline Competition Bureau (WCB), and Travis Litman, Acting Legal Advisor, WCB. In the meeting, we discussed industry concerns with the petitions filed by Vonage and various other VoIP providers ("Petitioners") for limited waiver of Section 52.15(g)(2)(i) of the Commission's rules regarding access to number resources. 47 C.F.R. § 52.15(g)(2)(i).

The CLEC Participants expressed their urgent concern that neither Vonage nor the other Petitioners has met the heavy burden necessary to demonstrate that special circumstances warrant deviation from the Commission's rules, given critical unresolved issues relating to discrimination, number exhaust, number portability, routing, interconnection, and intercarrier compensation. In light of the broad industry-wide ramifications of the waivers, a rulemaking that applies to all industry participants is the appropriate way to change the Commission's rules to permit the direct assignment of number resources to non-carriers. The CLEC Participants conveyed their view that they are opposed to allowing non-carriers to obtain direct access to numbers and that, if a VoIP provider would like such direct access, it should become a carrier.

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If you have any questions or require additional information, please do not hesitate to contact me at 202.659.6655.

Sincerely,

/s/ James C. Falvey

James C. Falvey
Counsel for CLEC Participants

cc: Michael Steffen
Sharon Gillett
Travis Litman