



Ann D. Berkowitz  
Director – Federal Regulatory Affairs

1300 I Street, NW  
Suite 400 West  
Washington, DC 20005  
(202) 515-2539  
(202) 336-7922 (fax)  
aberkowitz@verizon.com

June 8, 2012

## **Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
455 12th Street, S.W.  
Washington, DC 20554

**Re: Petitions of Vonage, et al, CC Docket No. 99-200, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208**

Dear Ms. Dortch:

Vonage and other VoIP providers (collectively, “Vonage”) in 2005 petitioned the Commission for waivers of the Commission’s rules so they could obtain direct access to numbering resources.<sup>1</sup> As it has previously explained, Verizon does not object to the Commission granting limited waivers to the petitioners, as long as the Commission makes clear that VoIP providers that obtain public North American Numbering Plan telephone numbers must comply with all the Commission’s numbering rules, including those pertaining to number portability, both for the numbers they obtain directly from the North American Numbering Plan Administrator and for numbers they port in.<sup>2</sup> The National Telecommunications Cooperative Association’s argument that the Commission has to address overarching regulatory questions regarding IP interconnection for voice before it grants Vonage’s petition muddies the waters unnecessarily and should be rejected.<sup>3</sup> VoIP providers should be subject to the same numbering requirements as carriers and should not be saddled with additional burdens whether imposed by states or otherwise.

In addition, Vonage has stated that today it relies upon middlemen carriers that are eligible to obtain numbering resources directly from the NANPA under the current rules, and that the presence of those middlemen is inhibiting its ability to implement IP interconnection

---

<sup>1</sup> See, e.g., Petition for Limited Waiver, *Vonage Holdings Corp. Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Commission’s Rules Regarding Access to Numbering Resources*, CC Docket No. 99-200 (March 4, 2005).

<sup>2</sup> Comments of the Verizon Telephone Companies, CC Docket No. 99-200 (April 11, 2005).

<sup>3</sup> See Letter from Michael R. Romano, National Telecommunications Cooperative Association, to Marlene H. Dortch, FCC, WC Docket No. 10-90, *et al.* (May 31, 2012).

Marlene H. Dortch

June 8, 2012

Page 2

agreements that it has negotiated.<sup>4</sup> As AT&T argued in a recent *ex parte*, and as Verizon previously has explained in this proceeding, the Commission should facilitate the ongoing market-led transition away from the circuit-switched PSTN towards IP-based networks for voice by eliminating unnecessary legacy regulations. That would include eliminating regulatory restrictions on the availability of numbers if those restrictions are inhibiting commercial IP interconnection arrangements. The best way the Commission can encourage the transition to IP voice networks is to avoid unnecessary regulation, including eliminating existing regulations that needlessly impose costs and complexity.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Stevens". The signature is fluid and cursive, with the first name "Ann" and last name "Stevens" clearly distinguishable.

cc: Ann Stevens  
Marilyn Jones  
Sanford Williams

---

<sup>4</sup> See Letter from Robert W. Quinn, Jr., AT&T, to Marlene H. Dortch, FCC, WC Docket No. 10-90, *et al.* (May 21, 2012). See also, *e.g.*, Letter from Brita D. Strandberg, Vonage, to Marlene H. Dortch, FCC, CC Docket No. 99-200 (March 21, 2012).