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January 8, 2013

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

**Re: Vonage Petition for Limited Waiver, CC Docket No. 99-200**

Dear Ms. Dortch:

On January 4, 2013, Rick Chessen and the undersigned, on behalf of the National Cable & Telecommunications Association (NCTA), spoke by phone with Julie Veach, Chief of the Wireline Competition Bureau, regarding the above-referenced petition. On January 7, 2013, I spoke by phone with William Dever, Chief of the Competition Policy Division, regarding the same topic. In both discussions, NCTA reiterated its position that the question of whether, and under what conditions, non-carriers should be given direct access to numbering resources is best addressed in the context of a rulemaking, rather than a waiver petition. We also explained that some cable operators rely on unaffiliated carriers for access to numbering resources, but that most large cable operators obtain numbers directly or through an affiliate.

Respectfully submitted,

**/s/ Steven F. Morris**

Steven F. Morris

cc: J. Veach  
W. Dever