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January 23, 2013

VIA ECFS ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

**Re: IB Docket 12-324
Notice of *Ex Parte* Communications**

Dear Ms. Dortch:

Vonage Holdings Corp. ("Vonage") through its undersigned counsel, hereby provides additional information to the Federal Communications Commission ("FCC" or "Commission") in support of Vonage's petition for relief in the US-Pakistan route in the above captioned docket (the "Petition").

Vonage hereby notifies the Commission that the termination rates to Pakistan remain at artificially high levels. Despite press reports that the Pakistan Telecommunication Authority ("PTA") has ordered the elimination of the International Clearing House exchange for international incoming calls to Pakistan ("ICH Plan") in response to orders of the Lahore High Court; in practice, the high settlement rates are still valid and Pakistani carriers continue to charge the artificially high rate of \$0.088 per minute for termination into Pakistan. As noted by AT&T on its December 19, 2013 *ex parte* filing in this proceeding, this rate is not cost-based and appears to be the result of concerted action among Pakistani carriers, even if the new rate is no longer mandated by the PTA.

Vonage also notes that these artificially high rates continue to harm US consumers and are contrary to long established Commission precedent in these types of cases. Thus, prompt Commission action under Section 64.1002(d) of the Commission's rules (47 C.F.R. § 64.1002(d)) is necessary to remedy the situation in Pakistan and return the settlement rate to cost-based levels. Vonage respectfully requests the Commission to grant an order prohibiting all US carriers from paying the Pakistani international long distance carriers identified in Vonage's Petition any amounts over the settlement rates that prevailed before implementation of ICH Plan (approximately US\$0.02 per minute).

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Should you have any questions concerning this *ex parte* notice, please to not hesitate to contact me.

Respectfully submitted,

/s/ Ulises R. Pin

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