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February 27, 2013

Via Electronic Filing

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

Re: *Petitions for Waiver of Commission's Rules Regarding Access to Numbering Resources*, CC Dkt. 99-200; *Connect American Fund, et. al*, WC Dkt. 10-90; GN Dkt. 09-51; WC Dkt. 07-135; WC Dkt. 05-337; CC Dkt. 01-92; CC Dkt. 96-45; WC Dkt. 03-109; WT Dkt. 10-208

Dear Ms. Dortch:

On February 25, 2013, Greg Rogers, Deputy General Counsel, Bandwidth.com, Inc.; Michael Mooney, General Counsel, Regulatory Policy, and Andrea Pierantozzi, Vice President, Voice Services, Level 3 Communications, LLC; and the undersigned ("CLEC Participants") spoke over the telephone with Michael Steffen, Office of Chairman Genachowski, and Bill Dever, Lisa Gelb and Travis Litman, Wireline Competition Bureau. The CLEC Participants discussed the petitions seeking waiver of Commission rules to obtain direct access to numbering resources ("Waiver Petitions").

They emphasized their opposition to the Waiver Petitions and asserted that, if the Commission is inclined to act, only a broad, comprehensive NPRM will ensure that Commission action does not provide special treatment to one party while discriminating against other industry members. Further, the CLEC Participants stated that they are opposed to the concept of using waivers as a method for conducting live test cases. Nevertheless, if the Commission is considering conducting some sort of a trial, the CLEC Participants emphasized that any trial must be limited in scope and duration and subject to transparent and rigorous reporting procedures.

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As required by Section 1.1206(b), this ex parte notification is being filed electronically for inclusion in the public record of the above-referenced proceedings. 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
Justin L. Faulb
Counsel for CLEC Coalition

cc: Michael Steffen
Lisa Gelb
Bill Dever
Travis Litman