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March 7, 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 March 5, 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, Julie Veach, Chief, Wireline Competition Bureau, 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 reiterated that they are opposed to the concept of using waivers as a method for conducting live trials. Nevertheless, if the Commission is considering conducting some sort of a trial, the CLEC Participants emphasized that any trial must be narrowly limited in scope and duration and subject to transparent and rigorous reporting procedures to avoid providing a head start or favorable treatment to one provider within the

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ecosystem. Further, any trial should include a varied and representative set of operating scenarios that will truly demonstrate the issues at hand, including but not limited to making independent and rural ILEC territories part of any trial. Finally, any trial should also be conducted *prior to* the initiation of an NPRM on these same issues so that Vonage does not have an unfair and discriminatory advantage from the live trial during the course of the NPRM.

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  
Julie Veach  
Lisa Gelb  
Bill Dever  
Travis Litman