



April 5, 2013

Ex Parte

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

Re: Petitions of Vonage, et al, CC Docket No. 99-200; Petition for Rulemaking to Change the Distribution Methodology for Shared Local Number Portability and Thousands-Block Number Pooling Costs, RM-11299; and Petition for Declaratory Ruling to Assess NPAC Database Intra-Provider Transaction Costs on the Requesting Provider, WC Docket No. 11-95

Dear Ms. Dorth:

On Thursday, April 4, 2013, Mark Montano and the undersigned of Verizon met with Nicholas Degani, Legal Advisor to Commissioner Ajit Pai, to discuss the above proceedings.

We explained that the Commission should grant Verizon's 2011 Petition for Declaratory Ruling while the Commission is focusing on numbering issues. The Petition seeks clarification of the Commission's 1998 Order¹ that carriers who initiate intra-company ports and modifies in the NPAC database should pay those costs themselves, without subsidization from other carriers. In the two years since Verizon filed the Petition, the number of intra-company ports and "modifies," and thus the costs of the NPAC database, have continued to rise.

In addition, we discussed why the Commission should include the Bellsouth Petition for Rulemaking² in the upcoming numbering NPRM. The Commission should examine how NPAC database costs for inter-company ports and pooling should be allocated. The Commission decided to allocate the inter-company port and pooling database costs by revenue "at this early stage" in 1998 in light of an inconclusive record.³ Fifteen years later, we are far from an early stage of local number portability, and the Bellsouth Petition and its associated record from 2006 made clear *over seven years ago* that the allocation of costs by revenue should not continue. As a result, we urged the Commission to take a forward step on this issue and include it in the NPRM.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann D. Berkowitz".

cc: Nicholas Degani

¹ *Telephone Number Portability*, Third Report and Order, 13 FCC Rcd 11701 ¶ 92 (1998) ("Third Report and Order").

² See BellSouth, *Petition for Rulemaking to Change The Distribution Methodology for Shared Local Number Portability and Thousands-Block Number Pooling Costs*, Petition for Rulemaking, RM-11299 (Nov. 3, 2005).

³ *Third Report and Order*, ¶ 88.