



WILTSHIRE
& GRANNIS LLP

April 11, 2013

Marlene H. Dortch
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Vonage's Petition for Limited Waiver*, CC Docket No. 99-200, GN Docket No. 13-5

Dear Ms. Dortch:

On April 10, 2013 the undersigned of Wiltshire & Grannis LLP, on behalf of Vonage, spoke in separate phone calls with Michael Steffen, Legal Advisor to Chairman Genachowski, and Lisa Gelb, Deputy Chief of the Wireline Competition Bureau.

In each call Vonage reiterated the importance to Vonage of direct access to numbers and urged the Commission to reject arguments designed to delay access to numbers and undermine the Commission's efforts to use a trial to gather real-world information in support of its rulemaking efforts. In addition, Vonage noted NTCA's concerns about a trial in rural areas, and observed that it may be difficult to immediately launch a successful trial in such areas in light of those concerns.

In addition, in the call with Ms. Gelb, Vonage reiterated points previously made in the record concerning how to address reporting requirements¹ and facilities readiness.²

If you have questions or require any additional information, please do not hesitate to contact me at (202) 730-1346.

Sincerely,

Brita D. Strandberg
Counsel to Vonage Holdings Corp.

cc: Michael Steffen
Lisa Gelb

¹ See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 3 (filed May 7, 2012).

² See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 4 (filed Feb. 9, 2012); Comments of AT&T Inc. CC Docket No. 99-200, at 3-4 (filed Jan. 25, 2012); Comments of Neutral Tandem, Inc., CC Docket No. 99-200, at 3 (filed Jan. 25, 2012).