



WILTSHIRE
& GRANNIS LLP

May 15, 2013

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

Re: *Numbering Policies for Modern Communications, WC Docket No. 13-97, IP-Enabled Services, WC Docket No. 04-36, Telephone Number Requirements for IP-Enabled Services Providers, WC Docket No. 07-243, Telephone Number Portability, CC Docket No. 95-116, Developing a Unified Inter-carrier Compensation Regime, CC Docket No. 01-92, Connect America Fund, WC Docket No. 10-90, Numbering Resource Optimization, CC Docket No. 99-200, Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources, Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules*

Dear Ms. Dortch:

On May 13, Brendan Kasper and, via teleconference, Ed Mulligan, Michael Doherty, and Craig Lennon, all of Vonage, and Madeleine Findley, Kristine Devine, and the undersigned, all of Wiltshire & Grannis LLP, met with William Dever, Lisa Gelb, Marilyn Jones, Melissa Kinkel, Rhonda Lien, Ann Stevens, Jamie Susskind, John Visclosky, and Sanford Williams, all of the Wireline Competition Bureau, to discuss Vonage's proposal for its trial of direct access to numbers as authorized in the Order released in the above-captioned proceedings.

During the meeting, Vonage discussed the general framework it is considering for its numbering trial proposal. Specifically, Vonage outlined the timeline under which it expects to implement the trial as well as the specific markets in which it expects to propose to conduct the trial. It noted that it expects to begin early testing approximately 60 days after the Bureau approves its proposal and that it expects it will take no more than 12 weeks to achieve full trial production. Vonage described the process it intends to use in testing and provisioning numbers, as well as the specific LATAs and Rate Centers that it is considering for its proposal. Vonage also discussed the specific steps it will take in working with the numbering and pooling administrators and with state numbering authorities.

Finally, Vonage briefly addressed the recent ex parte filed by the State Call Group, noting that it believes many of the group's concerns were anticipated and answered by the Numbering Order.

Marlene H. Dortch

April 12, 2013

Page 2 of 3

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'BDS', with a long horizontal flourish extending to the right.

Brita D. Strandberg

Counsel to Vonage Holdings Corp.

cc: William Dever
Lisa Gelb
Marilyn Jones
Melissa Kirkel
Rhonda Lien
Ann Stevens
Jamie Susskind
John Visclosky
Sanford Williams