



WILTSHIRE
& GRANNIS LLP

May 24, 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:

Vonage Holdings Corp. ("Vonage") hereby submits, pursuant to its response to the opposition of Bandwidth.com, Inc. to its request for confidential treatment of its proposal for a trial of direct access to numbers, a copy of that proposal with no redactions

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

Sincerely,

Brita D. Strandberg
Counsel to Vonage Holdings Corp.

cc: William Dever
Lisa Gelb
Marilyn Jones
Ann Stevens
Sanford Williams



WILTSHIRE
& GRANNIS LLP

May 17, 2013 – *unredacted public version filed
May 24, 2013*

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

Re: *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 Rules¹*

Dear Ms. Dortch:

Pursuant to Paragraph 101 of the *Notice of Proposed Rulemaking, Order, and Notice of Inquiry* issued in the above captioned proceedings (“*Numbering Order*”) on April 18, 2013, Vonage Holdings Corp. (“Vonage”) hereby submits its proposal for a trial of direct access to numbers to the Wireline Competition Bureau. Vonage is also submitting this proposal to the relevant state commissions, as required by the *Numbering Order*.

1. Certification

Vonage’s certification that it will comply with all terms and conditions of the waiver granted in the *Numbering Order* is attached.

2. Direct Assignment Rate Centers and LATAs

Vonage hereby informs the Commission of the specific Rate Centers and LATAs in which it proposes to receive numbers, as well as the amount of new numbers requested in each rate center or LATA, and the amount of numbers Vonage intends to port from existing or new customers in each rate center or LATA.² To facilitate the smooth deployment of the proposed

¹ A redacted version of this letter has been simultaneously filed in *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 Intercarrier Compensation Regime*, CC Docket No. 01-92, *Connect America Fund*, WC Docket No. 10-90.

² *Numbering Order* at ¶ 101.

trial, Vonage will file the requisite state notices for number allocations and work closely with the relevant numbering administrators throughout the trial.

a. Ported Numbers

Vonage proposes to undertake the trial of direct access to numbers described in the *Numbering Order* in three LATAs: Atlanta Georgia (#438), Eastern Mass (#128), and Phoenix Arizona (#666). Vonage will seek an LRN in the Conyers Rate Center in the Atlanta Georgia LATA, the Boston Rate Center in the Eastern Mass LATA, and the Phoenix Rate Center in the Phoenix Arizona LATA (the “LRN Rate Centers”). Vonage will, as required by relevant industry guidelines and practices,³ request a 10,000 block in each of the LRN Rate Centers. Vonage will return unutilized blocks from each 10,000 block to the Pooling Administrator as soon as reasonably practicable after receipt. The remaining numbers (other than the LRN) in each of the LRN Rate Centers will be available for assignment as New Numbers as discussed in Part 2.b below.

The chart below indicates the maximum number of numbers that Vonage will port in from new or existing customers (“Ported Numbers”) in each of the trial LATAs:

LATA		Ported Telephone Numbers
438	ATLANTA GEORGIA	50,000
128	EASTERN MASS	37,000
666	PHOENIX ARIZONA	33,000

b. New Numbers

Vonage proposes to use nine 1,000 blocks to support assignment of directly accessed numbers to new customers. Specifically, Vonage will use the A block in each of the LRN Rate Centers and proposes to obtain additional 1,000 blocks in the following Rate Centers: in the Atlanta Georgia LATA, Atlanta, Atlanta NE, Atlanta NW, Atlanta SO and Buford; in the Eastern Mass LATA, Cambridge (the “New Number Rate Centers”). As the trial proceeds, Vonage may propose to receive additional 1,000-blocks as provided in the *Numbering Order*.⁴

The chart below indicates the maximum number of directly-accessed numbers Vonage proposes to assign to end-user customers as new numbers (“New Numbers”) in each Rate Center:

³ *Id.* ¶ 105.

⁴ *Id.* ¶ 100.

LATA/Rate Center		New Customer Telephone Numbers
438	ATLANTA	1,000
438	ATLANTA NE	1,000
438	ATLANTA NW	1,000
438	ATLANTA SO	1,000
438	BUFORD	1,000
438	CONYERS	999
666	PHOENIX	999
128	BOSTON	999
128	CAMBRIDGE	1,000

3. Phase-In Process

Vonage proposes the following phase-in process to implement the numbering trial.

Pre-Trial

Apply to obtain number blocks from the numbering administrators for the Atlanta Georgia, Eastern Mass, and Phoenix Arizona LATAs shortly after the Wireline Competition Bureau approves the Vonage test proposal.

Alpha Stage—validation testing

Anticipated to be within two weeks of receipt of LRNs:

Step 1: Vonage will load newly received number blocks in industry databases and establish LRNs in LATAs 438, 128, and 666 and configure to Switch Homing Arrangement (“SHA”) in LERG & NPAC.

Step 2: Provision test numbers from each LRN A Block to Vonage test accounts and begin testing inbound PSTN-to-Vonage call routing.

Beta Stage—validation testing

Anticipated to be within four weeks of receipt of LRNs:

Step 3: Issue Local Service Requests (LSRs) to port test accounts from underlying carrier(s) with whom Vonage has SHAs to Vonage OCN.

Step 4: Monitor tested accounts to validate successful port to Vonage OCN within NPAC database.

Step 5: Place test calls to validate routing.

Production—live accounts

Anticipated to be within six weeks of receipt of LRNs:

Step 6: Enable customers to take Vonage OCN designated numbers in the New Number Rate centers.

Anticipated to be within eight weeks of receipt of LRNs:

Step 7: Begin porting of 1) new ordered customer ports and 2) migration of existing customers in each LATA pursuant to the following schedule:

LATA	Alpha	Beta	Production				
			Success Based	Success Based	Week 1	Week 2	Week 3
LATA 128	<50	<500	1,000	3,000	10,000	10,000	10,000
LATA 438	<50	<500	1,000	3,000	10,000	15,000	20,000
LATA 666	<50	<500	1,000	5,000	10,000	10,000	4,000
Total TNs	<150	<1,500	3,000	11,000	30,000	35,000	34,000
Cumulative – End of Stage Count	150	1650	4,650	15,650	45,650	80,650	114,650

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

Sincerely,



Brita D. Strandberg
 Counsel to Vonage Holdings Corp.

cc: William Dever
 Lisa Gelb
 Marilyn Jones
 Ann Stevens
 Sanford Williams

Timeline of Phase-In Process¹

Stage/Week		Description	Total/Cumulative TNs
Pre-Trial		<ul style="list-style-type: none"> • Apply to obtain number blocks from the numbering administrators in three LATAs: <ul style="list-style-type: none"> ○ LATA 128 ○ LATA 438 ○ LATA 666 	
Alpha Stage	<i>Week 1</i>	<ul style="list-style-type: none"> • Load newly received number blocks in industry databases and establish LRNs in LATAs. • Configure to Switch Homing Arrangement (“SHA”) in LERG & NPAC • Provision test numbers from each LRN A Block to Vonage test accounts: <ul style="list-style-type: none"> ○ LATA 128: <50 ○ LATA 438: <50 ○ LATA 666: <50 • Begin testing inbound PSTN-to-Vonage call routing 	<i>Total TNs: <150</i>
	<i>Week 2</i>		
Beta Stage	<i>Week 3</i>	<ul style="list-style-type: none"> • Issue Local Service Requests (LSRs) to port test accounts from underlying carrier(s) with whom Vonage has SHAs to Vonage OCN: <ul style="list-style-type: none"> ○ LATA 128: <500 ○ LATA 438: <500 ○ LATA 666: <500 • Monitor tested accounts to validate successful port to Vonage OCN within NPAC database 	<i>Total TNs: <1,500 Cumulative: <1,650</i>
	<i>Week 4</i>		
Production	<i>Week 5</i>	<ul style="list-style-type: none"> • Enable customers to take Vonage OCN designated numbers in the New Number Rate Centers. 	
	<i>Week 6</i>		
	<i>Week 7</i>	<ul style="list-style-type: none"> • Begin porting of 1) new ordered customer ports and 2) migration of existing customers in each LATA. • Production Week 1: <ul style="list-style-type: none"> ○ LATA 128: 1,000 ○ LATA 438: 1,000 ○ LATA 666: 1,000 	<i>Total TNs: 3,000 Cumulative: 4,650</i>
	<i>Week 8</i>	<ul style="list-style-type: none"> • Production Week 2: <ul style="list-style-type: none"> ○ LATA 128: 3,000 ○ LATA 438: 3,000 ○ LATA 666: 5,000 	<i>Total TNs: 11,000 Cumulative: 15,650</i>
	<i>Week 9</i>	<ul style="list-style-type: none"> • Production Week 3: <ul style="list-style-type: none"> ○ LATA 128: 10,000 ○ LATA 438: 10,000 ○ LATA 666: 10,000 	<i>Total TNs: 30,000 Cumulative: 45,650</i>
	<i>Week 10</i>	<ul style="list-style-type: none"> • Production Week 4: <ul style="list-style-type: none"> ○ LATA 128: 10,000 ○ LATA 438: 15,000 ○ LATA 666: 10,000 	<i>Total TNs: 35,000 Cumulative: 80,650</i>
	<i>Week 11</i>	<ul style="list-style-type: none"> • Production Week 5: <ul style="list-style-type: none"> ○ LATA 128: 10,000 ○ LATA 438: 20,000 ○ LATA 666: 4,000 	<i>Total TNs: 34,000 Cumulative: 114,650</i>

¹ Proposed dates are “anticipated within” dates (e.g., the proposed actions in Alpha stage are anticipated to take place within two weeks after receipt of LRNs).

CERTIFICATION

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 Intercarrier Compensation Regime, CC Docket No. 01-92

Connect America Fund, WC Docket No. 10-90

Numbering Resource Optimization, CC Docket No. 99-200

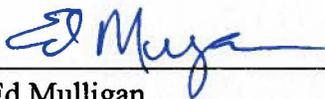
Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the

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

Pursuant to Paragraph 101 of the Notice of Proposed Rulemaking, Order, and Notice of Inquiry issued in the above-referenced proceedings ("Numbering Order") on April 18, 2013, Vonage Holdings Corp. ("Vonage") hereby certifies that it will comply with all terms and conditions of the waiver granted in the Numbering Order.

Vonage represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. Vonage also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 

Ed Mulligan
Vice President of Carrier Operations

May 17, 2013