

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

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)	
)	

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I. INTRODUCTION AND SUMMARY

Vonage commends the Federal Communications Commission (“FCC” or “Commission”) for moving forward to modernize its rules for the distribution and management of telephone numbers.¹ With this proceeding, the Commission is looking to the future of voice services. Allowing providers of interconnected Voice over Internet Protocol (“VoIP”) services direct access to numbers will promote the development of new and exciting technologies and further the Commission’s policy goals.

Today, consumers benefit from and expect an ever-expanding universe of communications devices and services. Against this backdrop, the Commission is wise to consider how to enable newer technologies, such as interconnected VoIP, to access telephone numbers. Congress recognized the importance of telephone numbers to competition when it mandated that numbers be made “available on an equitable basis” in the Telecommunications Act of 1996,² and the Commission has long vindicated this statutory goal, mandating nondiscriminatory access for CLECs, CMRS providers, and others. By removing unnecessary barriers to this public resource, the Commission will foster innovation and competition, and the public will reap the benefits. At the same time, as the Commission and Vonage recognize, direct access must be accompanied by safeguards to ensure that this public resource is used responsibly. The Commission has taken similar steps in the past, removing obstacles to long distance, local, wireless, interconnected VoIP and other competitive entry, opening new markets, and enabling the public to enjoy the benefit of new competitors and new services. The

¹ *Numbering Policies for Modern Communications et al.*, Notice of Proposed Rulemaking, Order and Notice of Inquiry, FCC 13-51, 28 FCC Rcd. 5842 (2013) (“NPRM”).

² *See* 47 U.S.C. § 251(e)

Commission's proposal to provide interconnected VoIP providers with direct access is the logical next step in this history, and Vonage strongly supports the Commission's efforts.

Vonage urges the Commission to move forward swiftly with this proceeding. The Commission has before it an extensive record demonstrating the benefits to consumers and competition that direct access can bring. It has also launched a trial of direct access that will fortify the paper record with real-world data and show that there are no technical or other impediments to direct access. Armed with this information, the Commission should promptly make the changes to its rules necessary to enable interconnected VoIP providers to directly access numbers.

The Commission has ample authority to take these steps, as it has plenary authority over numbering resources. It thus need not determine whether it has ancillary authority to extend numbering requirements to interconnected VoIP providers, nor must it devise specialized authorization procedures to enable direct access.

Further, the Commission should ensure that its new rules are competitively neutral, placing all providers with direct access on equal competitive footing. Providers of interconnected VoIP and their customers should have access to the same telephone numbers as traditional providers, and be subject to the same number utilization requirements. Similarly, the Commission should firmly reject arguments advanced by some providers that the Commission's porting rules do not require porting to interconnected VoIP providers with direct access to numbers. Of course, as Vonage has long argued, providers with direct access should be subject to the same rules, state authority, and industry standards that generally apply to recipients of numbering resources.

At the same time, the Commission should take steps to modernize its numbering requirements to accommodate new technologies and new entrants. In particular, it should adopt a flexible standard for facilities readiness that reflects the variety of network and routing options available to providers today. Similarly, the Commission's documentation requirements should enable otherwise qualified new entrants to apply for numbering resources. Finally, the Commission should not delay direct access by adopting a lengthy transition or burdensome and unnecessary rules. The record before the Commission demonstrates the immediate competitive and consumer benefits of direct access, and its carefully constructed trial will provide the real-world data necessary to determine whether further requirements are warranted. The existing record and ongoing trial will enable the Commission to ensure that any further requirements are narrowly tailored and quickly adopted. The Commission should move as quickly as possible to adopt direct access for interconnected VoIP providers in order to swiftly enable the competition and innovation that direct access will bring.

II. DIRECT ACCESS TO NUMBERS FOR INTERCONNECTED VOIP PROVIDERS PROMOTES KEY COMMISSION POLICY GOALS.

A. Direct Access to Numbers Promotes IP Interconnection and Will Facilitate the IP Transition.

Granting interconnected VoIP providers direct access to numbers will promote IP interconnection, a longstanding goal of the Commission. The Commission has acknowledged the ongoing “market-led transition in technology and services, from the circuit-switched PSTN system to an IP-based communications world,”³ noting that that migration “creates many opportunities for our country.”⁴ Granting VoIP providers direct access to numbering resources

³ *Comment Sought on Transition from Circuit-Switched Network to All-IP Network*, NBP Public Notice #25, DA 09-2517, at 2 (rel. Dec. 1, 2009).

⁴ *Id.* at 1.

can further facilitate those opportunities, even while ensuring that the transition to IP-based services does not result in the loss of essential services to consumers.

As the Commission has found, “IP interconnection between providers . . . is critical” to the widespread adoption of IP networks.⁵ Indeed, IP interconnection dramatically improves call quality by giving interconnected VoIP providers greater control over calls, avoiding unnecessary TDM/IP handoffs, providing greater visibility into call routing, and simplifying troubleshooting. More generally, IP interconnection promises benefits for both consumers and the industry as a whole. As T-Mobile’s Kathleen Ham has explained, broad adoption of IP interconnection will help create a “physical network structure that is more rational, effective, and efficient than the traditional tandem-centric telephone network.”⁶ The potential improvements are considerable:

[An] efficient and reliable IP network architecture [will be] able to reroute traffic to avoid outages. IP networks are self-healing and redundant, allowing alternate routes to be created dynamically. As a result, interconnection among networks requires far fewer points of interconnection (POIs), and those interconnection points are completely unrelated to the hub-and-spoke design of the current public switched network, which is tied to traditional ILEC (incumbent local exchange carrier) tandem switch locations.⁷

Both consumers and providers will benefit from these developments. Further, as technology continues to develop, VoIP providers and others will be able to implement new features and other improvements that require end-to-end IP transport.⁸ New rules enabling interconnected VoIP providers to obtain direct access to numbers “will spur the implementation

⁵ *Connect America Fund, et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd. 17,663, 18,044 ¶ 1010 (2011) (“CAF Order”).

⁶ Kathleen Ham, Vice President, Regulatory Affairs, T-Mobile USA, *Transition to IP Technology Requires Some FCC Oversight* (March 29, 2013), <http://multimediacapsule.thomsonone.com/t-mobile/transitiontoip>.

⁷ *Id.*

⁸ Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 2 (filed July 31, 2012) (“Vonage July 31, 2012 Ex Parte”).

of IP-enabled services and facilitate increased choices of services for American consumers.”⁹ As the Commission noted in its order granting a waiver of the numbering rules to SBCIS, facilitating the implementation of IP-enabled services such as VoIP “increases economic productivity and growth” and “will encourage consumers to demand more broadband connections, which will foster the development of more IP-enabled services.”¹⁰

B. Direct Access to Numbers Will Improve the Quality of VoIP Services for Customers and Facilitate the Deployment of Advanced Services

Direct access to numbers will enable interconnected VoIP providers to reduce their reliance on third-party providers, enabling new efficiencies and giving greater control over call routing and the quality of service provided to customers. Direct access will allow interconnected VoIP providers like Vonage and SBCIS greater efficiency “by interconnecting with the PSTN on a trunk-side basis, at a centralized switching location, *e.g.*, a tandem switch,”¹¹ which enables the VoIP provider “to use its softswitch and media gateways more efficiently to overcome the availability and scalability limitations inherent in retail interconnections with the PSTN.”¹² Just as with wireless communications, facilitating direct interconnection for interconnected VoIP providers will allow them to offer “superior technical capabilities and greater service quality,” and may help them to ‘minimize unnecessary duplication of switching facilities and the

⁹ *Administration of the North American Numbering Plan*, Order, FCC 05-20, 20 FCC Rcd. 2957, 2961 ¶ 8 (2005) (“SBCIS Waiver Order”); *see also* NPRM ¶ 7; Vonage July 31, 2012 Ex Parte at 2.

¹⁰ SBCIS Waiver Order at 2961 ¶ 8.

¹¹ Petition for Limited Waiver by of Section 52.15(g)(2)(i) of the Commission’s Rules Regarding Access to Numbering Resources by Vonage Holdings Corp. at 3, CC Docket No. 99-200 (filed March 4, 2005) (“Vonage Petition”). *See also* Petition for Limited Waiver of Section 52.15(g)(2)(i) of the Commission’s Rules Regarding Access to Numbering Resources by SBC IP Communications, Inc. at 5, CC Docket No. 99-200 (filed July 7, 2004) (“SBCIS Petition”).

¹² Vonage Petition at 3. *See also* SBCIS Petition at 5.

associated costs to the ultimate consumer.”¹³ Direct IP-to-IP interconnection allows Vonage to deliver calls in end-to-end IP, which will enhance call quality by eliminating quality loss through conversion from IP to TDM and back to IP. End-to-end IP also allows for enhancements like HD voice codecs.

As SBCIS explained in its original petition, requiring VoIP providers to obtain numbers from CLECs, together with essential services to interconnect to the PSTN, can limit the growth of interconnected VoIP because of “availability and scalability” of such products.¹⁴ SBCIS highlighted such limitations as the limited “locations, calling scopes, and installation schedules of the providers and products utilized to gain access to end-offices.”¹⁵

C. Direct Access to Numbers Will Facilitate Number Portability and the Deployment of Key Features

Vonage has highlighted the role direct access will play in facilitating ancillary services that rely on numbers, particularly with regard to number portability and certain key features like caller ID. To port telephone numbers under the current regime, both the interconnected VoIP provider and its third-party numbering provider must coordinate several discrete steps to successfully complete a number port; any breakdown in communication can cause customer-impacting errors.¹⁶ Moving to direct access eliminates this risk. Direct access to numbers will

¹³ SBCIS Petition at 4 (citing *The Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services*, Report No. CL-379, Declaratory Ruling, 2 FCC Rcd. 2910, 2913 ¶ 27 (1987); *FCC Policy Statement on Interconnection of Cellular Systems*, attached as Appendix B to *The Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services*, Memorandum Opinion and Order, 59 Rad. Reg. 2d (P&F) 1275, 1986 WL 1248411 ¶ 2 (1986)).

¹⁴ SBCIS Petition at 3.

¹⁵ *Id.*

¹⁶ See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 5 (filed Nov. 11, 2011) (“Vonage Nov. 11, 2011 Ex Parte”).

also enable interconnected VoIP providers like Vonage to implement features such as Caller ID and SMS that require population of certain call signaling fields.¹⁷ In order to offer such products currently, providers such as Vonage must obtain the consent and cooperation of their wholesale CLEC numbering partners. There is no guarantee that such cooperation will be offered timely if at all, to the detriment of consumers. Moreover, each time Vonage seeks to update or improve these services, or to provide new services that use numbers, it must again seek the cooperation of its CLEC partners.¹⁸ This process is cumbersome and wasteful, operating as a barrier to the deployment of these key features.

D. Direct Access to Numbers Will Promote the Transition to Bill-and-Keep.

Although direct access to numbers for interconnected VoIP providers will not have any direct effect on intercarrier compensation,¹⁹ it will facilitate the transition to a bill-and-keep regime—a goal that the Commission has found serves the public interest²⁰—by encouraging providers to voluntarily transition more traffic to bill and keep through commercial agreements. As Vonage has explained, it intends to seek bill-and-keep arrangements, and has executed prospective bill-and-keep agreements with carriers in advance of obtaining direct access to numbers, when it enters into direct interconnection agreements with other IP providers.²¹

¹⁷ See Vonage July 31, 2012 Ex Parte.

¹⁸ Comments of Vonage Holdings Corp. at 5, CC Docket No. 99-200 (filed Jan. 25, 2012) (“Vonage Comments”).

¹⁹ See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 7-8 (filed May 7, 2012) (“Vonage May 7, 2012 Ex Parte”).

²⁰ See CAF Order 17,905-14 ¶¶ 740-759

²¹ Vonage May 7, 2012 Ex Parte at 8.

E. Direct Access to Numbers Will Enhance Visibility into Number Utilization.

Direct access will also enhance visibility into number utilization for states and the Commission, as Vonage has previously explained.²² Under the existing regime, numbering partners' numbering utilization reports reflect only their use of numbers—not their interconnected VoIP provider customers' use. Thus, a CLEC's report could include numbers for multiple interconnected VoIP providers who obtain numbers on a wholesale basis from the CLEC—numbers that may not actually be in use by those VoIP providers.²³ Further an interconnected VoIP provider's numbers could be spread among multiple CLECs. By enabling interconnected VoIP providers to directly access numbers, the Commission will also enable these providers to report on their number usage, providing states with a much more detailed understanding of how numbers are actually being used.²⁴

F. Direct Access to Numbers Will Increase Competition and Reduce Costs to Consumers.

Perhaps most importantly, allowing interconnected VoIP providers direct access to numbers will improve competition in the voice services market, improving the options for consumers and reducing costs. Eliminating the middleman for telephone numbers will reduce costs for VoIP providers. Given the competitiveness of the voice services market, this savings

²² See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 2 (filed March 21, 2012) (“Vonage March 21, 2012 Ex Parte”) (noting that rules granting numbers directly to interconnected VoIP providers will “provide states with greater visibility into numbering”).

²³ NPRM at 5855-56 ¶ 22.

²⁴ *Id.*

will be passed directly to consumers in the form of reduced prices, improved service, and additional features.²⁵

III. THE COMMISSION’S PLENARY AUTHORITY OVER NUMBERING RESOURCES ALLOWS IT TO IMPLEMENT NEW RULES WITHOUT THE NEED FOR DISRUPTIVE CHANGES TO EXISTING PROCEDURES.

The Commission does not need to take any special steps to ensure its ability to impose and enforce numbering obligations on VoIP providers. The Communications Act of 1934, as amended (“Act”), endows the Commission with plenary authority over numbering resources,²⁶ giving Commission “exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States”²⁷ and “authority to set policy with respect to all facets of numbering administration in the United States.”²⁸

The Commission asks whether its ancillary authority under Title I permits it to impose numbering obligations on VoIP providers;²⁹ this question is unnecessary. The Commission need not exercise ancillary authority where it already has plenary authority. The rules the Commission proposes to modify and adopt in the NPRM are directly authorized by Section 251(e), making the status of VoIP providers relative to the Commission’s Title I authority irrelevant to the question whether the Commission may exercise jurisdiction over those providers when they are authorized to obtain numbers directly. As the Commission itself notes, “any

²⁵ See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 5 (filed Nov. 14, 2011).

²⁶ See 47 U.S.C. § 251(e).

²⁷ 47 U.S.C. § 251(e)(1).

²⁸ *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996 et al.*, Second Report and Order and Memorandum Opinion and Order, FCC 96-333, 11 FCC Rcd 19,392, 19,512, ¶ 271 (1996).

²⁹ See NPRM at 5876-77 ¶ 85.

entity that participates in [the numbering] administration—including VoIP providers that obtain numbers, whether or not they are carriers—must adhere to the Commission’s numbering rules.”³⁰

This plenary authority permits the Commission to impose and enforce numbering obligations on any entity that directly obtains numbers, including VoIP providers. In particular, the Commission need not create a specialized authorization process to ensure that it can enforce the obligations imposed on VoIP providers. To the extent VoIP providers obtain numbers directly under rules established the Commission pursuant to its authority over numbering resources, the Commission has plenary authority to enforce those rules.

IV. RULES GOVERNING PROCESS SHOULD BE FAIR, NOT ONEROUS, AND REFLECTIVE OF THE COMPETITIVE BENEFITS OF DIRECT ACCESS TO NUMBERS BY VOIP PROVIDERS.

The Commission’s proposal to grant VoIP providers direct access to numbers has the potential to have tremendous positive effects on the public interest by reducing costs, increasing efficiencies, and accelerating the move toward IP services. In implementing its rules, however, the Commission must take care to ensure that VoIP providers are not subject to obligations or requirements that would reduce their ability to compete or discourage new VoIP providers from entering the market. The Commission should also avoid using this proceeding as an opportunity to expand regulatory burdens on VoIP providers without justification.

A. The Commission Need Not Adopt the Proposed Waiver Conditions in Its Revised Numbering Rules.

Allowing VoIP providers direct access to numbers via a rulemaking is a very different matter than granting limited waivers of the existing rules to accommodate VoIP providers. In the context of a rulemaking, special conditions for certain providers are unnecessary.³¹ A request for

³⁰ NPRM at 5876 ¶ 84.

³¹ Under the Administrative Procedures Act, the rulemaking provisions were “designed to assure fairness and mature consideration of rules of general application,” *NLRB v. Wyman-*

a waiver must show that the purpose of the rule for which the waiver is sought will not be served by its strict application, or that there are unique or unusual factual circumstances that make the rule particularly burdensome or inequitable.³² That showing may require the party requesting a waiver to accept limiting conditions, in order to ensure that the Commission does not exceed its authority in granting the waiver.³³ Thus Vonage—and the other petitioners for a limited waiver of Section 52.15(g)(2)(i)—proposed various conditions, and agreed to accept other conditions proposed by other parties, in order to address concerns held by the Commission and others that grant of the requested waiver would cause or create problems within the *existing* numbering regime.³⁴

A rulemaking initiated to modify the existing numbering regime, however, does not require limiting conditions designed to protect the underlying purposes of the existing rule, because the existing rule is itself being modified. In undertaking this rulemaking, the Commission has indicated that it believes the existing rules do not maximize the public interest

Gordon Co., 394 U.S. 759, 764 (1969). In contrast, “[t]he very essence of waiver is the assumed validity of the general rule, and also the applicant's violation unless waiver is granted.” *WAIT Radio v. FCC*, 418 F.2d 1153, 1158 (D.C. Cir. 1969).

³² See 47 C.F.R. § 1.925(b)(3).

³³ The Commission’s waiver authority is limited to providing relief warranted by “the instant case,” 47 C.F.R. § 1.925(b)(3), and grant of a waiver must not undermine the underlying policy of the rule. “The function of a waiver is not to change the general standard of the rule, since this is a matter for which the opportunity for general comment is a prerequisite under the Administrative Procedure Act, but instead to justify an ad hoc exception to that standard in a particular case.” *Communications Satellite Corp. Request for Waiver of Section 25.131(j)(1) of the Commission's Rules As It Applies to Services Provided Via the Intelsat K Satellite*, DA 92-955, 7 FCC Rcd. 4602, ¶ 5 (1992) (citing *Applications for authority to construct and operate an Automated Maritime Telecommunications System using the Group C channels (216.5125 to 216.9875 MHz) along the Lower Mississippi River and the Gulf Intracoastal Waterway filed by Riverphone, Inc. T/A Maritel*, FCC 88-245, 3 FCC Rcd. 4690, 4692 (1988)).

³⁴ See, e.g., Vonage July 31, 2012 Ex Parte; Vonage May 7, 2012 Ex Parte.

and that revision of those rules will better serve consumers, industry, and government.³⁵ In other words, the Commission is *reconsidering* the underlying purposes of the rule, and crafting a new framework designed to meet those purposes. In this case, conditions attached to a waiver request that were designed to ensure that the existing rule's underlying purposes continue to be met in particular circumstances are no longer necessary—and, in fact, have the potential to undermine the eventual success of the new regulatory regime.

In the context of this proceeding, it is critical that the Commission avoid imposing requirements on VoIP providers that are inequitable or otherwise burden VoIP providers in such a way that reduces competition or discourages entry into the market. In particular, Vonage asks the Commission to ensure that its documentation requirements do not disadvantage new entrants, that it refrain from allowing states to restrict the rate centers from which VoIP providers may obtain numbers, that it not impose more stringent number utilization requirements on VoIP providers or otherwise place discriminatory limits on VoIP providers, and that it ensure that VoIP providers are subject to the same administrative requirements as other carriers.

B. Documentation Requirements Must Accommodate New Entrants.

Vonage urges the Commission to ensure that the documentation required for provision of numbers to VoIP providers does not work to exclude new entrants. Thus, although Form 477 is an attractive option because it requires detailed information about the service an interconnected VoIP provider makes available in a given state, any new VoIP provider seeking direct access to numbers as part of launching a new service will not have a Form 477 on file at the time they seek to obtain numbers. Those providers should not be forced to begin service without access to the same resources as other providers.

³⁵ NPRM at 5842 ¶ 1; *id.* at 5853 ¶ 16.

Vonage respectfully suggests that FCC Form 499-A should be sufficient documentation for any new provider seeking direct access to numbers. Form 499-A requires identifying information about a provider as well as information about where the provider will or does provide service. Though this information is also available on Form 477, a new provider must file a Form 499-A for registration purposes *before* it begins service,³⁶ while Form 477 is only filed after an entity has commenced service. Adopting the Form 499-A as the required documentation for receipt of numbers thus ensures that new providers will not be barred from receiving numbers—as they would if Form 477 were required—while also ensuring the numbering administrator has all of the information it needs to certify eligibility.

C. The Commission Should Not Allow States to Restrict the Rate Centers in Which VoIP Providers May Obtain Numbers.

Vonage supports allowing VoIP providers to obtain numbers from any rate center subject to the same protections against number exhaust that apply to all number recipients. In this respect, VoIP providers should not be treated any differently than traditional carriers. VoIP subscribers are no different from subscribers to traditional wireline service—they care about their numbers and often want them to correspond to their physical location. Allowing states to restrict VoIP providers from obtaining numbers in any rate center thus puts VoIP providers at a competitive disadvantage by limiting them to obtaining numbers that might be considered undesirable by prospective VoIP subscribers. One of the Commission’s stated goals in this

³⁶ See 2013 Telecommunications Reporting Worksheet Instructions (FCC Form 499-A) at 6, 12 (Feb. 2013), *available at* http://www.usac.org/_res/documents/cont/pdf/forms/2013/FCC_499A_Form-Instructions.pdf.

proceeding is to “promote innovation, investment, and competition”³⁷—a goal that cannot be achieved if VoIP providers are relegated to taking numbers that no one else wants.

Vonage is particularly concerned that some proposals, such as those made by the California PUC, could have extreme anti-competitive effects on VoIP providers. California is understandably concerned about stranded numbers—many of which have been stranded because of the industry standards and guidelines regarding acquisition of a block of numbers to support an LRN. It proposes to remedy this stranding by allowing states to restrict VoIP access to numbers in certain rate centers. While Vonage noted that, in the context of a waiver, it would be willing to accept such a condition “provided that Vonage has reasonable access to numbers in a state and its customers are not required to surrender numbers they have already been assigned,”³⁸ imposing this condition on all VoIP number recipients under a new rule would impose a severe competitive disadvantage on those providers.

Vonage also believes that this condition is likely unnecessary. One of the circumstances that leads to stranded numbers—the requirement that a provider hold an LRN (and thus obtain a 10,000 block) in every LATA in which it has numbers—is currently being considered for revision by ATIS and the Common Interest Group on Rating and Routing (“CIGRR”).³⁹ Codifying a restriction that affects only certain providers when the underlying concern is under review by the relevant standards group risks implementing a rule that will quickly become

³⁷ NPRM at 5842 ¶ 1.

³⁸ Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 3 (filed Feb. 9, 2012) (“Vonage Feb. 9, 2012 Ex Parte”).

³⁹ See Alliance for Telecommunications Industry Solutions, Inc., *Location Routing Number (LRN) Assignment Practices*, ATIS-0300065 at 1 (Sept. 30, 2011), available at <http://www.atis.org/inc/Docs/finaldocs/LRN-Assignment-Practices-Final-Document-09-30-11.doc>; it is Vonage’s understanding that the CIGRR Subcommittee intends to address revision of LRN assignment practices in the near future.

irrelevant or even arbitrary. Number exhaust is certainly a concern, but it is not a sufficient rationale to justify burdening VoIP providers more than traditional carriers—particularly given the much smaller percentage of numbers overall that will be held by VoIP providers. If the Commission believes that its numbering rules should be modified to address the problem of number exhaust, it cannot modify those rules in such a way as to affect only some providers—and certainly not only the newest and most innovative entrants to the market.

D. The Commission Should Impose Consistent Number Utilization Requirements on Those with Direct Access to Numbers.

Nor should the Commission impose more stringent number utilization requirements on VoIP providers than on carriers. As it has noted on the record, Vonage already maintains a very high level of number utilization; it does not expect that direct access to numbers will change that efficient use.⁴⁰ But if the Commission requires all VoIP providers that obtain numbers directly to meet a higher utilization percentage than carriers, it will disadvantage one type of provider. Any number utilization requirements should apply equally to all providers, just as they do today.

As the Commission notes, the mere imposing of number utilization and reporting requirements directly on VoIP providers will improve the ability of the Commission and states to assess number utilization and anticipate, and limit, number exhaust.⁴¹ The NPRM notes that CLECs may obtain numbers for a VoIP partner and list those numbers as “assigned” even if they are held in reserve in anticipation of orders from the VoIP number partners;⁴² Vonage understands that CLECs similarly list numbers as “active” once they’ve been purchased by a VoIP provider despite having no knowledge of whether those numbers are actually in use by an

⁴⁰ See Vonage July 31, 2012 Ex Parte at 5.

⁴¹ NPRM at 5855-56 ¶ 22.

⁴² NPRM at 5855-56 ¶ 22.

end user. By granting VoIP providers the ability to obtain numbers directly—and requiring those providers to report their own number utilization—information reported on the NRUF will give the Commission and states “a significantly more accurate assessment of number utilization.”⁴³ Vonage expects that the Commission and states will find that VoIP providers already utilize numbers much more efficiently than carriers.⁴⁴ In the absence of any evidence that VoIP providers are likely to contribute in any significant manner to number exhaust, the Commission should refrain from mandating that VoIP providers adhere to number utilization requirements that exceed those currently imposed on carriers or otherwise imposing obligations on VoIP providers that are not required of other entities with direct access to numbers by the industry standards and guidelines.

E. The Commission Should Ensure That Any Other Numbering Rules Imposed on VoIP Providers Are Non-Discriminatory.

The other restrictions that have been variously proposed by states and by the Commission include such requirements as providing state commissions with regulatory and numbering contacts, consolidating and reporting numbers under a single OCN, and maintaining the original rate center designation of all numbers, as wireline and wireless carriers do today.⁴⁵ Vonage agreed to these requirements as a condition of its waiver, and agrees that these conditions—inssofar as they are standard conditions imposed on any provider with direct access to numbers—are appropriate for VoIP providers as well. Similarly, Vonage does not oppose the

⁴³ NPRM at 5855-56 ¶ 22.

⁴⁴ As Vonage has noted on the record, the CLEC industry average number utilization is 34 percent; ILECs average 47.3 percent utilization; and wireless carriers average 66.7 percent utilization. *See* Vonage July 31, 2012 Ex Parte at 5 (citing Craig Stroup & John Vu, Industry Analysis and Technology Division, Wireline Competition Bureau, Federal Communications Commission, NUMBERING RESOURCE UTILIZATION IN THE UNITED STATES 2 (2011), http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-303900A1.pdf).

⁴⁵ *See* NPRM ¶ 34; Comments of the Wisconsin PSC at 4-7.

Commission’s proposal that VoIP providers give their subscribers the ability to access N11 numbers in use in a state, provided such an obligation is dependent on states making available to Vonage and other VoIP providers the information needed to correctly route those calls.

V. THE COMMISSION SHOULD ALLOW VOIP PROVIDERS TO SHOW FACILITIES READINESS VIA COMMERCIAL AGREEMENTS WITH INTERCONNECTED CARRIERS.

The NPRM seeks comment on how best to approach “facilities readiness” requirements for interconnected VoIP providers seeking direct access to numbers. Vonage suggests that interconnected VoIP providers seeking direct access to numbers be required to show facilities readiness by proving they have commercial agreements in place for marketplace solutions that enable interconnection with the PSTN, though not necessarily interconnection agreements.

A. The LEC Model for Facilities Readiness Did Not Contemplate Interconnected VoIP Providers.

Section 52.15(g)(2)(ii) of the Commission’s rules requires that carriers “demonstrate ‘facilities readiness’ before they can obtain initial numbering resources, which helps to ensure that carriers are not building inventories before they are prepared to offer service.”⁴⁶ In its SBCIS Waiver Order, the Commission required that SBCIS “satisfy this requirement using the same type of information submitted by carriers,” typically an interconnection agreement with the incumbent LEC that serves the geographic area in which the carrier proposes to operate.⁴⁷

Interconnected VoIP providers, however, likely will be unable to provide an interconnection

⁴⁶ NPRM at 5858 ¶ 29.

⁴⁷ *Id.*; the Central Office Code (NXX) Assignment Guidelines (“COCAG”) provide additional detail, and allow service providers to supply one of several documents that supply “[a]ppropriate evidence that facilities are in place or will be in place to provide service within 60 days of the numbering resources activation date (LERG Routing Guide effective date).” COCAG at Section 4.2.2, available online at http://www.trainfo.com/products_services/tra/documents.html, COCAG download link). As made clear in the guidelines, the underlying purpose of these requirements is to ensure that prospective Code Holders are both authorized and capable of providing service in the relevant service area.

agreement because only LECs can enter into interconnection agreements, which must be approved by state public service commissions, and VoIP providers are not generally LECs.⁴⁸ Because of this, the Commission allowed waiver recipients to demonstrate that they had “ordered a service pursuant to a tariff that is generally available to other providers of IP-enabled voice services.”⁴⁹ The NPRM seeks comment on whether this remains a good approach to address the concerns underlying the “facilities readiness” rule.

B. Interconnected VoIP Providers Should Be Required to Demonstrate the Ability to Properly Route Calls.

Instead of trying to impose the LEC model on VoIP providers, the Commission should carefully craft a definition of facilities readiness for interconnected VoIP providers that recognizes their unique position in the voice services marketplace. As noted, VoIP providers are generally precluded from seeking interconnection agreements because they are not LECs. And as AT&T has previously noted, “it would be unfortunate if the Commission ‘unwittingly restricted competition in the market for IP-PSTN connectivity by forcing VoIP providers to deal only with carriers that offer these services through state-approved interconnection agreements or federal/state tariffs.’”⁵⁰

Vonage supports a flexible definition of facilities readiness that would allow VoIP providers to demonstrate that they have commercial agreements in place to enable connectivity to the PSTN through alternative marketplace solutions, such as traffic-exchange agreements or

⁴⁸ See Comments of AT&T Inc. at 3, CC Docket No. 99-200 (filed Jan. 25, 2012) (“AT&T Comments”).

⁴⁹ NPRM at 5858 ¶ 29.

⁵⁰ AT&T Comments at 3 (citing Comments of SBC Internet Services, Inc. at 9, CC Docket 99-200 (filed April 11, 2005))

an alternative tandem provider, as proposed by AT&T and Neutral Tandem, respectively.⁵¹

These marketplace solutions are already available to support VoIP providers' connection to the PSTN. As Neutral Tandem explained, "competitive tandem providers currently offer services allowing [voice services providers] to designate competitive tandems as the homing tandems for their assigned telephone numbers in the LERG,"⁵² enabling the routing of traffic to or from telephone numbers assigned directly to VoIP providers over the designated tandem switches through the competitive tandem provider.⁵³ Such arrangements, in other words, enable VoIP providers to route traffic to and from the PSTN to their customers and should therefore be accepted as evidence of facilities readiness.

The interconnected VoIP provider must also confirm that the partner LEC has the capability to properly route or complete calls. In most cases, this will mean that the partner LEC has its own commercial agreements in place with the local tandem provider giving express consent to subtend traffic to the relevant local and access tandems, either through direct trunking or an interconnection agreement with the local tandem provider. Such agreements are essential to permit termination of calls to end users with NXXs associated with switches that subtend that tandem.

Instead of relying on the NANPA or the VoIP provider to review the partner LEC's network and commercial arrangements, however, Vonage suggests that interconnected VoIP providers and their partner LECs fulfill this requirement through a certification by the partner

⁵¹ See Vonage Feb. 9, 2012 Ex Parte at 4 (citing Comments of AT&T Inc. at 3, CC Docket No. 99-200 (filed Jan. 25, 2012); Comments of Neutral Tandem, Inc. at 3, CC Docket No. 99-200 (filed Jan. 25, 2012)).

⁵² Neutral Tandem Comments at 2, CC Docket No. 99-200 (filed Jan. 25, 2012) ("Neutral Tandem Comments").

⁵³ See Neutral Tandem Comments at 2.

LEC that it has the right to route traffic over the local tandem, either through direct trunking or an interconnection agreement with the local tandem provider. Requiring the partner LEC to certify its capabilities, rather than requiring VoIP providers or their partner LECs to “prove” such capabilities, would provide a simple method for ensuring that providers have the facilities readiness necessary to ensure proper call routing.

Such certifications have been successfully used in other contexts. For example, Multichannel Video Programming Distributors (“MVPDs”) are required to supply closed captioning for the video content they provide.⁵⁴ Closed captioning rules permit MVPDs to rely on certificates of compliance from programmers to demonstrate their own compliance with the captioning rules.⁵⁵ A similar approach is warranted here.

VI. THE COMMISSION MUST REFRAIN FROM ADOPTING NEW RULES WHERE SUCH RULES ARE UNNECESSARY.

A. Call Routing and Termination Are Adequately Addressed By the Proposed Solutions for VoIP Providers and Will Be Supported By the Ongoing Trial of Direct Access to Numbers.

As Vonage and others have explained, currently available marketplace solutions, together with inclusion of VoIP providers in the LERG and other relevant databases, ensure that call routing and termination are adequately addressed. Providing interconnected VoIP providers direct access to numbers will not adversely affect call routing or tracking. There is simply nothing unique about these arrangements; these routing and tracking tasks are already in place today, and Vonage will continue to route traffic consistent with existing guidelines and

⁵⁴ 47 C.F.R. § 79.1(g)(6).

⁵⁵ 47 C.F.R. § 79.1(e)(7).

practices.⁵⁶ Giving VoIP providers greater control over the routing of their calls will actually improve call routing and completion.⁵⁷

Vonage is confident that current marketplace solutions are sufficient to ensure that calls to and from interconnected VoIP providers with direct access to numbers are properly routed. To assure adequate service for both VoIP providers and consumers, Vonage has explained that the marketplace solutions provider must have the capability to properly route or complete calls, either by commercial agreements in place with the local tandem provider giving express consent to subtend traffic to the relevant local and access tandems or through direct trunking. Vonage suggests that the providers of such marketplace solutions provide a certification that they have such capabilities, specifically the right to subtend traffic to the tandem.⁵⁸

The ongoing numbering trials will supply additional clarity and comfort that no routing problems exist and will reveal complications, if any, that arise with the use of marketplace routing and termination solutions or including VoIP providers in industry databases. This is the very purpose of the current numbering trials: to inform any further action the Commission must take to address the concerns some stakeholders have raised about routing and call termination. The trials are intended to give an “informative test case that will allow the Commission to identify any problems and create industry-wide rules to address” any issues.⁵⁹ Vonage and other participants are required to report “the total number of routing failures, along with the causes of those failures” monthly throughout the duration of the trial.⁶⁰ To the extent the use of

⁵⁶ See, e.g., Vonage May 7, 2012 Ex Parte at 7.

⁵⁷ See, e.g., Vonage March 21, 2012 Ex Parte at 2-3.

⁵⁸ See *supra* at Part V.B.

⁵⁹ NPRM at 5881 ¶ 98.

⁶⁰ NPRM at 5883 ¶ 103.

marketplace solutions negatively impacts routing or call completion, any such problems will be thoroughly documented through the trial process. The Commission need not, and should not, address hypothetical issues in advance of this real-world data—data that may demonstrate that there is no need for regulatory intervention.

As Vonage has explained, it and other interconnected VoIP providers can purchase marketplace solutions already used by industry participants for transit and tandem routing functions from companies such as Level 3, Neutral Tandem (now Inteliquent), or Peerless Network.⁶¹ The VoIP provider can designate the switch of the carrier partner in industry databases as the default routing location for traffic bound to its telephone numbers, just as many CLECs already do today.⁶² As Vonage has noted in past filings, it is “common practice” to reference the switch of one carrier in the LERG for telephone numbers assigned to a different carrier.⁶³ Indeed, in the numbering trial, Vonage has proposed to configure its newly received number blocks to Switch Homing Arrangement (“SHA”) in LERG & NPAC.⁶⁴ The Commission and interested stakeholders will have ample opportunity to evaluate this method throughout the numbering trials.

⁶¹ Vonage March 21, 2012 Ex Parte at 1-2.

⁶² See Vonage May 7, 2012 Ex Parte at 6 (citing Neutral Tandem Feb 8 Comments at 2); see also Vonage March 21, 2012 Ex Parte at 1-2.

⁶³ Vonage March 21, 2012 Ex Parte at 2.

⁶⁴ See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-97 *et al.*, at 3 (filed May 17, 2013) (“Vonage Trial Proposal”).

B. Direct Access to Numbers By VoIP Providers Does Not Negatively Impact Intercarrier Compensation.

As Vonage has explained throughout this proceeding, allowing VoIP providers direct access to numbers will have no direct effect on intercarrier compensation.⁶⁵ To deliver outbound traffic to the PSTN, interconnected VoIP providers will likely have to use a telecommunications carrier to deliver this traffic to the terminating carrier. For outbound access, the Commission's rules provide that access charges are to be paid by "interexchange carriers."⁶⁶ This obligation does not turn on who is assigned the number from which a call originates, and enabling the assignment of telephone numbers to interconnected VoIP providers will, accordingly, not alter existing obligations to pay access charges. The terminating LEC will continue to bill terminating access to the IXC, delivering the traffic using IXC CIC codes.

There would similarly be no issues with outbound reciprocal compensation. As explained above, interconnected VoIP providers will likely continue to route outbound PSTN traffic through carrier partners. Outbound non-access traffic will therefore continue to fall within the definition of non-access traffic under the Commission's rules and compensation requirements.⁶⁷ The call signaling rules adopted in the CAF Order require Vonage and its carrier partners to pass calling party numbers unaltered.⁶⁸ These carriers and terminating carriers will therefore have the calling party data necessary to route and bill Vonage traffic as local where appropriate, just as they do today.

For inbound traffic, the Commission has clearly set forth the intercarrier compensation obligations of carriers and VoIP providers in the recent USF/ICC Transformation Order

⁶⁵ See, e.g., Vonage July 16, 2012 Ex Parte at 1-2.

⁶⁶ 47 C.F.R. § 69.5(b).

⁶⁷ 47 C.F.R. § 51.701(b).

⁶⁸ 47 C.F.R. § 64.1601.

Clarification Order.⁶⁹ Where VoIP providers rely on carrier partners—that is, where they do not have direct IP interconnection agreements—the Commission’s rules entitle those carrier partners to collect intercarrier compensation for functions they or Vonage perform.⁷⁰

By enabling VoIP providers to seek IP-interconnection arrangements, however, direct access will facilitate the transition to a bill-and-keep regime—a goal that the Commission has found serves the public interest⁷¹—by encouraging providers to voluntarily transition more traffic to bill and keep through commercial agreements. As Vonage has explained, it intends to seek bill-and-keep arrangements when it enters into direct interconnection agreements with other IP providers and, indeed, already has agreements in place with carriers in anticipation of direct access to numbers.⁷²

C. VoIP Providers Are Already Subject to Numbering Cost Allocation.

Vonage agrees that providers with access to numbering resources should be treated equally for purposes of the cost allocation rules for numbering administration, portability, and pooling.⁷³ Vonage notes that it and other VoIP providers already are subject to the numbering cost allocation rules,⁷⁴ and Vonage agrees that these rules should apply to all providers with direct access to numbering resources.

⁶⁹ See *USF/ICC Transformation Order Clarification Order*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208 (rel. Feb. 3, 2012).

⁷⁰ See *id.*, Vonage May 7, 2012 Ex Parte at 7-8.

⁷¹ See CAF Order at 17,905-14 ¶¶ 740-759.

⁷² See Vonage May 7, 2012 Ex Parte at 8.

⁷³ See NPRM 5872 ¶ 68.

⁷⁴ *Universal Service Contribution Methodology et al.*, WC Docket No. 06-122 *et al.*, Report and Order and Notice of Proposed Rulemaking, FCC 06-94, 21 FCC Rcd. 7518, 7536-7538 ¶¶ 34-37 (2006).

D. The Commission Should Make the Local Number Portability Rules Explicit to Ensure Compliance with This Existing Obligation.

As Vonage has explained on the record,⁷⁵ Section 52.35 obligates “[a]ll telecommunications carriers required by the Commission to port telephone numbers” to “complete . . . port request[s].”⁷⁶ Local exchange carriers are undoubtedly “telecommunications carriers required by the Commission to port telephone numbers.” The rule does not limit this porting obligation to ports to other carriers. Even if it did, the rule defines “carrier” as including interconnected VoIP providers.⁷⁷

The Commission’s 2007 VoIP LNP Order confirms this understanding.⁷⁸ That order established that local number portability obligations attach to ports *to and from* interconnected VoIP providers.⁷⁹ Thus, VoIP providers must port numbers out to other providers, and carriers must port to VoIP providers. As noted in the NPRM, the VoIP LNP Order “clarif[ied] that carriers have an obligation under our rules to port-out NANP telephone numbers, upon valid request, for a user that is porting that number for use with an interconnected VoIP service.”⁸⁰

The obligation to complete ports out to VoIP providers does not hinge on whether that VoIP provider obtains numbers via a relationship with a CLEC partner or directly. As the NPRM notes, the VoIP LNP Order post-dated the Commission’s grant of SBCIS’s waiver of Section 52.15(g)(2). Thus, the Commission contemplated that the requirements of the VoIP LNP

⁷⁵ See, e.g., Vonage July 31, 2012 Ex Parte at 3.

⁷⁶ 47 C.F.R. § 52.35.

⁷⁷ 47 C.F.R. § 52.35.

⁷⁸ *Telephone Number Requirements for IP-Enabled Services Providers*, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, FCC 07-188, 22 FCC Rcd. 19,531 (2007) (“VoIP LNP Order”).

⁷⁹ VoIP LNP Order at 19,543-44 ¶ 23 (prescribing “requirements that expand number portability to include ports to and from interconnected VoIP providers”).

⁸⁰ NPRM at 5868 ¶ 59 (citing VoIP LNP Order at 19,550 ¶ 35).

Order would encompass situations in which the receiving VoIP provider might have direct access to numbers rather than only through a carrier partner.

Vonage does not believe that the local number portability rules need to be modified or otherwise changed. But it is clear that some parties believe that they are not obligated to complete ports to interconnected VoIP providers.⁸¹ This suggests that it may be beneficial for the Commission to make its local number portability rules more explicit. If the Commission addresses local number portability in this proceeding, however, it should do so only to make clear to all parties that the VoIP LNP Order and the Commission's porting rules apply equally to carriers and VoIP providers, including VoIP providers with direct access to numbers.

VII. A QUICK TRANSITION TO DIRECT ACCESS BY VOIP PROVIDERS WILL ALLOW ENHANCED COMPETITION AND INNOVATION WITHOUT UNNECESSARY DELAY.

Vonage urges the Commission to not only move forward quickly to issue its proposed new rules granting interconnected VoIP providers direct access to numbers, but to also ensure that the transition period is as brief as possible. A lengthy transition period is unnecessary. Extending the timeline for granting direct access will not serve any technical purpose, as the ongoing numbering trials are intended to uncover and address any such issues. Nor will an extended transition serve any policy goals. Though a more rapid implementation will accelerate the transition to bill and keep as VoIP providers and others are incented to negotiate IP interconnection, there is no need to reconcile that trend with the ongoing intercarrier compensation proceeding.

Furthermore, the Commission need not impose any delay in transitioning to direct access out of concern for CLEC revenues. As Vonage has noted on the record, CLEC concerns about

⁸¹ See, e.g., Letter from James Falvey, Eckert Seamans, counsel to Level 3 Communications, LLC, Bandwidth.com, and COMPTTEL, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 2 (July 19, 2012).

revenue are significantly overstated.⁸² Not only are the amounts at issue relatively small, but the nature of the transition to direct access and IP interconnection by VoIP providers already ensures that any revenue declines will be gradual. Though Vonage anticipates that direct IP interconnection arrangements by VoIP providers will increase over time after VoIP providers gain direct access to telephone numbers, the decline of traditional PSTN interconnection arrangements where CLECs handle traffic inbound to VoIP customers will be gradual, and it is unlikely that those arrangements will disappear in the foreseeable future.⁸³ Further, it is likely that a sizeable number of carriers will prefer to continue with the current PSTN interconnection arrangements over CLEC facilities for economic or technical reasons rather than shift to direct IP interconnection with interconnected VoIP providers like Vonage.⁸⁴ Thus, for the foreseeable future, it is likely that significant levels of inbound VoIP traffic will continue to be carried over CLEC networks subject to CLEC access charges as allowed by the Commission's rules.

Nor will the shift to direct access to numbers cause a dramatic reduction in CLEC revenue from the sale of numbering resources⁸⁵—indeed, Vonage is likely the largest interconnected VoIP provider that obtains numbers directly, and its total number inventory is a very small fraction of the number inventory of its carrier partners.⁸⁶ As Vonage has noted on the record, CLECs obtain much more revenue from the sale of numbers to non-interconnected

⁸² See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 1 (filed Aug. 14, 2012) (“Vonage Aug. 14, 2012 Ex Parte”).

⁸³ See Vonage Oct. 22, 2012 Ex Parte at 2.

⁸⁴ See Vonage Aug. 14, 2012 Ex Parte at 2.

⁸⁵ See Vonage Aug. 14, 2012 Ex Parte at 3.

⁸⁶ See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 3 (filed Feb. 12, 2013).

VoIP providers than to interconnected VoIP providers.⁸⁷ Finally, direct access to numbers will affect a limited range of carrier services purchased by VoIP providers.⁸⁸

⁸⁷ See Vonage Aug. 14, 2012, Ex Parte at 3.

⁸⁸ See Letter from Brita D. Strandberg, Wiltshire & Grannis LLP, counsel to Vonage Holdings Corp., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 99-200, at 1 (filed Oct. 22, 2012) (“Vonage Oct. 22, 2012 Ex Parte”).

VIII. CONCLUSION

Vonage applauds the Commission's visionary commitment to direct access to numbers and recognition of the consumer benefits, innovation, and competition direct access will deliver. Vonage urges the Commission to move ahead quickly with its rulemaking so that Vonage and other providers may use direct access to advance IP interconnection, accelerate bill and keep, improve quality of service, increase number utilization transparency, and, most importantly, deliver innovative and competitive services to the public.

Respectfully submitted,



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