

Ronald W. Del Sesto, Jr.
Direct Phone: 202.373.6023
Direct Fax: 202.373.6001
r.delsesto@bingham.com

August 1, 2013

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

**Re: Ex Parte Notice - In the Matter of Rural Call Completion, WC
Docket No. 13-39**

Dear Ms. Dortch:

On July 30, 2013, the undersigned and Brendan Kasper of Vonage Holdings Corp. (“Vonage”) met with Priscilla Argeris, Legal Advisor to Commissioner Rosenworcel. We also met with Jean Ann Collins, William Dever, Richard Hovey, Gregory Kwan, Steven Rowings, Carol Simpson, and Jamie Susskind of the Wireline Competition Bureau; and Margaret Dailey and Theodore Marcus of the Enforcement Bureau regarding the Commission’s Notice of Proposed Rulemaking in the above-captioned proceeding.

Vonage expressed support for the Commission’s proposed rural call completion reporting framework in general. Vonage shares the Commission’s goal of improving call completion and quality of service to rural areas. The company has strong incentives with respect to both call completion and call quality as each weigh heavily in a consumer’s decision to retain Vonage’s services. Vonage strives to retain customers and avoid excessive customer churn. Furthermore, customer complaints regarding call completion and call quality are particularly costly to resolve because they require investigation and action by network engineers on Vonage’s Advanced Operations Support team instead of front-line customer care personnel. Accordingly, there are strong market-based incentives for Vonage to ensure customers are receiving the best possible call quality and call completion rates regardless of where a called or calling party is located.

Vonage also explained its efforts to improve call quality by investing in a state-of-the-art platform for routing PSTN-bound calls to both rural and non-rural customers in the most efficient manner, which reduced call completion-related Customer Care calls by 40% between the first quarter of 2011 and the fourth quarter of 2012. Vonage has developed a “Scorecard” system to provide more granular data on both domestic and international call completion and call quality. Vonage recently refined Scorecard to allow domestic and international call completion and call quality teams to obtain near-real time NPA-NXX-level reports on call completion and call quality metrics and to

Beijing
Boston
Frankfurt
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T +1.202.373.6000
F +1.202.373.6001
bingham.com

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incorporate the list of Operating Carrier Numbers and rural carriers provided by the Commission.

We cautioned the Commission against adopting the false ringing rule because it would not address the underlying problem of excessive post-dial delay caused by excessive call setup time. Prohibiting false ringing could have unintended consequences such as extended silence after the call is placed. This could lead to confusion and increased hang-ups by the calling party, which would increase (rather than reduce) the incidence of call completion problems.

Finally, we recommended that the Commission sunset the quarterly reporting requirement after a maximum period of two years, since the economic incentives to avoid high rural terminating intrastate and interstate access charges through the use of least-cost routers will be significantly reduced within this timeframe as terminating access charges steadily transition to a bill-and-keep regime pursuant to the Commission's reform of the intercarrier compensation system. Moreover, after two full years of reporting rural call completion rates to the Commission, responsible long-distance voice providers will have been forced to resolve any rural call completion issues that are uncovered by the reporting process.

Please do not hesitate to contact the undersigned with any questions.

Respectfully Submitted,

/electronically signed/
Ronald W. Del Sesto, Jr.

cc: Priscilla Argeris (FCC)
Jean Ann Collins (FCC)
William Dever (FCC)
Richard Hovey (FCC)
Gregory Kwan (FCC)
Steven Rowings (FCC)
Carol Simpson (FCC)
Jamie Susskind (FCC)
Margaret Dailey (FCC)
Theodore Marcus (FCC)
Brendan Kasper (Vonage)