

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 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))	

REPLY COMMENTS OF COMPTTEL

COMPTTEL respectfully submits these reply comments pursuant to the Notice of Proposed Rulemaking, Order, and Notice of Inquiry, *Numbering Policies for Modern Communications et al.*,¹ in response to an issue raised by the RBOCs in their initial comments.

In their initial comments, AT&T, Verizon, and CenturyLink propose that the Commission change the methodology for allocating the costs for local number portability

¹ Notice of Proposed Rulemaking, Order, and Notice of Inquiry, *Numbering Policies for Modern Communications et al.*, FCC 13-51, WC Docket No. 13-97 *et al.*, ¶ 1 (2013) (“Numbering NPRM” or “NPRM”).

(“LNP”) and number pooling.² While COMPTTEL agrees with Verizon that the Commission should require any interconnected VoIP provider who directly accesses numbers to participate in the existing cost allocation processes,³ COMPTTEL opposes any change to the cost allocation methodology. The RBOCs’ proposals for modification of the cost allocation methodology have previously been raised with the Commission. In 2006, BellSouth (now AT&T) proposed a usage based methodology for the existing revenue-based methodology for recovery of the shared costs of LNP and number pooling.⁴ In 2011, Verizon sought a declaratory ruling that costs characterized by NPAC as LNP Type 1 or “modifier” costs not be treated as shared costs for purposes of the cost allocation mechanism.⁵ The RBOCs have provided no new evidence in their comments that justifies their proposals, and COMPTTEL hereby incorporates by reference its earlier comments opposing the RBOCs’ requests.⁶ The Commission should not revisit these issues, and the RBOCs have not provided any valid reason to do so here.⁷

² AT&T at 29; Verizon at 4-7; CenturyLink at 20-3.

³ Verizon at 21.

⁴ BellSouth Corp. Petition for Rulemaking to Change the Distribution Methodology for Shared Local Number Portability And Thousands-Block Number Pooling Costs, RM-11299, filed Nov. 3, 2005.

⁵ Verizon and Verizon Wireless Petition for Declaratory Ruling, WC Docket No. 11-95, received May 31, 2011.

⁶ COMPTTEL Statement in Opposition, RM-11299, filed Jan. 5, 2006; Comments of COMPTTEL, WC Docket No. 11-95, filed Jul. 15, 2011.

⁷ If the Commission were to, nonetheless, take up this issue in the present proceeding, it should release a public notice in order to refresh the record prior to altering the cost allocation methodology.

Additionally, claims made by the RBOCs concerning VoIP interconnection are being considered in other proceedings.⁸ To the extent the Commission decides to evaluate those issues in this proceeding, COMPTTEL's hereby incorporates by reference our comments from the Proposed Transitions Trials proceeding and USF/ICC Transformation proceeding.⁹

Respectfully submitted,

/s/

Karen Reidy
COMPTTEL
900 17th Street, NW
Suite 400
Washington, D.C. 20006
(202) 296-6650 phone

August 19, 2013

⁸ *Technology Transitions Policy Task Force Seeks Comment on Potential Trials*, GN Docket No. 13-5, Public Notice, DA 13-1016 (Technology Transitions Policy Task Force, May 10, 2013) (*Notice*); Report and Order and Further Notice of Proposed Rulemaking, *Connect America Fund et al*, FCC 11-161, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, GN Docket No. 09-51, CC Docket Nos. 01-92, 96045, and WT Docket No. 10-208 (rel. Nov. 18, 2011) (“FNPRM” or “ICC Transformation Order”).

⁹ Comments of COMPTTEL (including Attachments), GN Docket No. 13-5, filed Jul. 8, 2013; Reply Comments of COMPTTEL, GN Docket No. 13-5, filed Aug. 7, 2013; Comments of COMPTTEL, WC Docket No. 10-90 *et al*, filed Feb. 24, 2012; Reply Comments of COMPTTEL, WC Docket No. 10-90 *et al*, filed Mar. 30, 2012.