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ATTORNEYS AT LAW

September 19, 2013

Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 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:

Pursuant to Paragraph 101 of the *Notice of Proposed Rulemaking, Order, and Notice of Inquiry* issued in the above captioned proceedings on April 18, 2013 ("*Numbering Order*"), Vonage hereby submits its Second Report on its numbering trial. Under the *Numbering Order*, the initial report is due sixty (60) days after Vonage requests direct access to numbers. After the initial report, ongoing reports are due monthly during the course of the trial.

Vonage filed its initial report on the trial on August 19, 2013. As in the initial report, Vonage has nothing to report for the specific reporting categories under the *Numbering Order*<sup>1</sup> in

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<sup>1</sup> The reporting categories include:

1. Total new numbers placed in service by Vonage;
2. Total number of port-in requests (including existing Vonage customers as well as newly won customers);
3. Number of port-out requests for directly held numbers and the percentage of successful port outs;
4. Total number of routing failures, along with the cause of those failures; and
5. Description of any billing or compensation disputes.

this report. Under Vonage's *Numbering Trial Proposal*, it is still in the pre-trial phase (applying for initial codes in trial markets, establishing LRNs, and testing routing and porting).

On September 1, the LRNs for the Atlanta and Boston markets became effective across the industry. This is a necessary condition for Vonage to begin operational testing. In the Atlanta and Boston markets, Vonage has successfully completed the Alpha Stage of testing. Under Vonage's *Numbering Trial Proposal*, the Alpha Stage of testing was to confirm basic inbound PSTN-to-Vonage call routing for numbers directly held by Vonage. Vonage is currently in the Beta Stage testing for the Atlanta and Boston markets. The Beta Stage of testing will test porting and inbound PSTN-to-Vonage call routing for ported numbers. For Atlanta and Boston, we expect to start provisioning new customers using Vonage OCN designated numbers and to begin transitioning existing customer telephone numbers to the Vonage OCN around October 1, 2013.

In the Phoenix market, the LRN became effective on August 24. We have not, however, yet been able to reach agreement with CenturyLink, the relevant RBOC, to ensure that routing of PSTN traffic to telephone numbers directly held by Vonage will work properly. In contrast to CLECs, which might only have a few interconnections, almost all carriers in a market connect to the RBOC. Therefore, it is necessary to have agreement with the RBOC in the market on how PSTN traffic will flow to telephone numbers directly held by Vonage. Until we reach agreement with CenturyLink on PSTN routing, we cannot move forward with the testing stage in Phoenix. If we can reach agreement on the PSTN routing, Phoenix will likely be approximately one month behind Atlanta and Boston.

If you have any questions, please do not hesitate to contact me at (202) 730-1346 or [bstrandberg@wiltshiregrannis.com](mailto:bstrandberg@wiltshiregrannis.com).

Sincerely,



Brita D. Strandberg  
*Counsel to Vonage Holdings Corp.*

cc: William Dever  
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