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ATTORNEYS AT LAW

October 24, 2013

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th 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 Third Report on its numbering trial.¹ 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 and its second report on September 19, 2013.

As of this report, Vonage provides the following information for the specific reporting categories in Paragraph 103 of the *Numbering Order*.

1. Total of new numbers placed in service: 572

¹ Vonage is voluntarily filing this report in advance of the filing deadline. Due to the government shutdown and the extension of filing deadlines, this report is not due until November 4, 2013. *Revised Filing Deadlines Following Resumption of Normal Commission Operations*, Public Notice, DA 13-2025 (Oct. 17, 2013).

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| 2. Total number of port-in requests (including migration of existing customers and newly won customers): | 80,786 ² |
| 3. Percentage of successful port-ins: | 100% |
| 4. Total number of port-out requests for directly held numbers: | 11 |
| 5. Percentage of successful port-outs: | 100% ³ |
| 6. Total number of routing failures: | None |
| 7. Description of any billing or compensation disputes: | None |

The above information is for the Atlanta and Boston markets. In the Phoenix market, we have not 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 in Phoenix.

If you have any questions, 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

² There are also 99 port-in requests currently pending. In addition, there have been 11 port-in requests that were rejected due to the customer providing insufficient information to meet the losing carrier's validation requirements and 5 port-in requests that were cancelled by the requesting customer prior to the port being executed.

³ There are also 8 port-out requests currently pending. In addition, there were 2 port-out requests rejected because the requested number was not a Vonage number.