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October 24, 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 October 23, 2013, the undersigned and Brendan Kasper of Vonage Holdings Corp. (“Vonage”) had separate conference calls with Nicholas Degani, Legal Advisor to Commissioner Pai, and Christianna Barnhart, Attorney Advisor to the Wireline Competition Bureau, regarding the Commission’s Notice of Proposed Rulemaking in the above-captioned proceeding. Vonage emphasized that any new rules regarding the presentation of a “comfort ring” to calling parties should become effective no sooner than 90 days following the publication of the Order in the Federal Register. Vonage explained that while it presents callers with a “comfort ring” infrequently on domestic calls, any change in the call logic on a large scale must be done methodically and tested prior to deployment. Vonage noted that allowing such time would benefit all providers subject to the rule.

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

Respectfully Submitted,

/electronically signed/

Ronald W. Del Sesto, Jr.

cc: Nicholas Degani (FCC)  
Christianna Barnhart (FCC)  
Brendan Kasper (Vonage)

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