



Joseph C. Cavender
Vice President
Federal Affairs
Tel: (571) 730-6533
joseph.cavender@level3.com

November 20, 2013

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
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 Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *Numbering Resource Optimization*, CC Docket No. 99-200

Dear Ms. Dortch:

On November 18, 2013, I, on behalf of Level 3 Communications, LLC (Level 3 LEC), and its affiliate Level 3 Enhanced Services, LLC (Level 3 ES, and collectively, Level 3), met with Nicholas Degani of the Office of Commissioner Pai to discuss Level 3's experience attempting to test routing for voice communications traffic in the Denver rate center in connection with the numbering trial established by the Commission in the *VoIP Numbering Trial Order*.¹ The presentation was consistent with the points made in Level 3's November 5 *ex parte*.²

I also observed that CenturyLink had stated, in a recent *ex parte*, that it "is more than willing to waive any charges for the trial period" which it would otherwise charge Level 3 for the facilities it apparently acknowledges are unnecessary but that it nevertheless insists Level 3 purchase from CenturyLink.³ Even setting aside the question of whether such facilities could be

¹ *Numbering Policies for Modern Communications*, et al., Notice of Proposed Rulemaking, Order, and Notice of Inquiry, 28 FCC Rcd 5842 (2013) (*VoIP Numbering Trial Order*).

² See Letter from Joseph C. Cavender, Level 3 Communications, LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-97, et al. (filed Nov. 5, 2013).

³ See Letter from Jeffrey S Lanning, CenturyLink, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-97, et al. (filed Nov. 15, 2013).

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set up before the trial period ends on December 17, CenturyLink's proposal would require Level 3 to purchase unnecessary facilities to establish inefficient routing a month from now rather than today, which does not address Level 3's concerns with CenturyLink's refusal to route traffic to it in connection with the trial.

Please do not hesitate to contact me with any questions regarding this matter.

Sincerely,

/s/ Joseph C. Cavender
Joseph C. Cavender

cc: Nicholas Degani