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December 30, 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 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

Dear Ms. Dortch:

Pursuant to paragraph 103 of the *Notice of Proposed Rulemaking, Order, and Notice of Inquiry* issued in the above-captioned proceedings on April 18, 2013,<sup>1</sup> Level 3 Communications, LLC (“Level 3 LEC”), on behalf of itself and its affiliates, WilTel Communications, LLC and Level 3 Enhanced Services, LLC (“Level 3 ES,” and all collectively, “Level 3”), hereby submits its final report on its numbering trial. Data reported are current as of December 17, 2013.

1. Total number of new telephone numbers placed in service: 2,821
2. Total number of port-in requests: 22,669
3. Percentage of successful ports-in: 100%<sup>2</sup>
4. Total number of port-out requests for Level 3 ES numbers held directly: 21
5. Percentage of successful ports-out: 100%
6. Total number of routing failures: 0

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<sup>1</sup> *Numbering Policies for Modern Communications*, WC Docket No. 13-97, et al., Order, 28 FCC Rcd 5842, 5883, ¶ 103 (2013) (“Order”).

<sup>2</sup> This figure excludes port-in requests that were pending or canceled as of December 17, 2013.

7. Billing/compensation disputes: None

Additionally, Level 3 notes that, as stated in its trial plan, and consistent with the Commission's intent to determine what impact direct access to numbers would have on promoting IP interconnection for the exchange of VoIP traffic, Level 3 ES intended to seek IP interconnection with a variety of carriers, including wireless as well as incumbent and non-incumbent wireline providers.<sup>3</sup> Level 3 was disappointed but not surprised that the major incumbent LECs and wireless carriers with which it sought to establish IP interconnection were unable or unwilling to support IP interconnection for purposes of the trial, even though IP interconnection among competitive carriers is commonplace.

A final point regarding the initial Level 3 trial plan bears mentioning as well. Level 3 initially proposed to conduct its numbering trial in the Boston, MA; Charlotte, NC; Concord, NC; Dallas, TX; Denver, CO; Los Angeles, CA; and Rochester, NY rate centers. Testing was successful, and Level 3 ES carried live traffic for telephone numbers directly assigned to itself in all of those proposed rate centers except the Denver and Concord, NC rate centers.

In the Denver rate center, as noted in prior filings, Level 3 was unable to successfully test call routing.<sup>4</sup> CenturyLink, the incumbent serving that area, advised Level 3 that it would not route traffic to Level 3 ES for telephone numbers associated with the Level 3 ES Operating Company Number over its existing interconnection with Level 3 LEC, although it did not identify any technical, regulatory, or other obstacle to routing the traffic in this manner. As a result, Level 3 ES was unable to conduct the trial in the Denver rate center, and Level 3 ES decided to return its code block to support efficient usage of code blocks in the Denver rate center.

In the Concord, NC rate center, Level 3 ES did not submit a request for telephone numbers. Level 3 ES's trial plan for that rate center was dependent on the timing of obtaining its new LRN for the Charlotte, NC LATA. Level 3 determined that a minimum of 30 days would be necessary for conducting a thorough trial. Because the LERG effective date for Concord numbers would have been late November, Level 3 concluded that there would not have been sufficient time to conduct an adequate trial. Level 3 notes, however, that the incumbent serving the area, Windstream Concord, was cooperative and engaged with Level 3 ES in discussing a

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<sup>3</sup> See Order, 28 FCC Rcd at 5878, ¶ 88.

<sup>4</sup> 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); Letter from Joseph C. Cavender, Level 3 Communications, LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13-97, et al. (filed Nov. 12, 2013).

Marlene H. Dortch  
December 30, 2013  
Page 3

potential trial, and was fully prepared to exchange traffic with Level 3 ES using existing TDM facilities between Level 3 LEC and Windstream Concord.

Please contact the undersigned with any questions about this matter.

Sincerely,

/s/ Joseph C. Cavender

Joseph C. Cavender

cc: William Dever  
Lisa Gelb  
Marilyn Jones  
Melissa Kinkel  
Ann Stevens  
Sanford Williams