



WILTSHIRE  
& GRANNIS LLP

1200 18TH STREET, NW  
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301  
WWW.WILTSHIREGRANNIS.COM

ATTORNEYS AT LAW

January 13, 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 Intercarrier 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:

On January 9, 2014, on behalf of Vonage Holdings Corp., Brendan Kasper and Ed Mulligan, both of Vonage, and Kristine Devine and the undersigned, both of Wiltshire & Grannis LLP, met with Bill Dever, Lisa Gelb, Ann Stevens, Sanford Williams, John Visclosky, and, via teleconference, Melissa Kirkel, of the Wireline Competition Bureau, and Jonathan Sallet, Henning Schulzrinne, and Patrick Halley of the Technology Transitions Task Force, to discuss the recently-concluded trial of direct access to numbers by interconnected VoIP providers.

Vonage confirmed to staff the resounding success of the trial, pointing out that, during the trial, Vonage was able to conclude an agreement for direct IP interconnection with Verizon and has had success in moving negotiations forward with other providers. Vonage discussed the benefits of direct IP interconnection, though it noted that many of those benefits will remain unrealized while Vonage is limited to the approximately 118,000 numbers it deployed during the trial. Vonage noted that, once it is exchanging traffic in IP directly with Verizon and other providers, it expects to be able to offer higher quality service to its subscribers, including offering features like high-definition voice. It also looks forward to reducing some of the costs and inefficiencies that arise when its subscribers' numbers are owned by a CLEC partner and it must seek permission from the number owners to implement even simple services like Caller ID.

In discussing the success of the trial, Vonage described the trial as “transparent” for customers, who saw no changes to their service. Vonage itself experienced no routing problems, no porting problems, and, to date, has received no reports of intercarrier compensation issues.

Vonage discussed other lessons from the trial, noting for instance that the need to obtain a 10,000 block of numbers to get an LRN and become a code holder seems to be an unnecessary holdover from legacy systems. Vonage believes that it and other providers can more efficiently use numbers when they can obtain an LRN with a 1,000 block, obviating the need to return additional numbers from a 10,000 block.

Vonage also briefly discussed its experience with CenturyLink during the trial. Vonage noted that, while it was disappointed that it could not reach an agreement with CenturyLink during the trial, that does not reflect on the success of the trial. As the IP transition progresses and as the industry moves towards bill and keep for intercarrier compensation, the market will move providers to the increasing use of arrangements like the one Vonage reached with its CLEC partner and the ILECs in the Atlanta and Boston markets.

Finally, Vonage noted that it is pleased to have had the opportunity to demonstrate the real-world trial the benefits of direct access to numbers. Vonage hopes the Bureau will recommend in its upcoming report on the trials that the Commission move expeditiously to adopt rules permitting interconnected VoIP providers direct access to numbers.

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  
Lisa Gelb  
Patrick Halley  
Melissa Kinkel  
Jonathan Sallet  
Henning Schulzrinne  
Ann Stevens  
John Visclosky  
Sanford Williams