



WILTSHIRE
& GRANNIS LLP

1200 18TH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.WILTSHIREGRANNIS.COM

ATTORNEYS AT LAW

April 11, 2014

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 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 April 9, Kurt Rogers, Chief Legal Officer, Graham McGonigal, Senior Vice President of Network Operations, Ed Mulligan, Vice President of Carrier Operations, and Brendan Kasper, Senior Regulatory Counsel, all of Vonage, and Kristine Devine and the undersigned of Wiltshire & Grannis LLP, met with Priscilla Argeris, Legal Advisor to Commissioner Rosenworcel, and Rebekah Goodheart, Legal Advisor to Commissioner Clyburn. On April 10, the same group met with Commissioner Ajit Pai and his Chief of Staff, Matthew Berry; Daniel Alvarez, Legal Advisor to Chairman Wheeler; and Amy Bender, Legal Advisor to Commissioner O'Rielly,

In these meetings, Vonage encouraged the Commission to quickly adopt rules granting qualified interconnected VoIP providers direct access to numbers. Over the course of the last three years, the Commission has developed an extensive record, including real-world data from the numbering trial, that overwhelmingly demonstrates the public interest benefits of direct access.

Most importantly, direct access promotes IP interconnection. Direct access removes a discrete obstacle to IP interconnection as, without direct access to Vonage's potential IP interconnection, partners cannot easily route traffic to Vonage because they cannot identify

Vonage customer numbers in industry routing databases and use these databases to route traffic to Vonage.

Even with the limited volume of telephone numbers in the numbering trial, Vonage was able to reach IP interconnection agreements with multiple providers, including Verizon. There is little doubt that Vonage would be able to greatly expand its IP interconnections if the Commission were to adopt its proposed rule allowing direct access by interconnected VoIP providers, as the value of an IP interconnection arrangement for a potential IP interconnection partner is directly related to the volume of customer telephone numbers that Vonage can provide access to under the IP interconnection arrangement. In addition, the certainty from permanent rules would give potential IP interconnection partners much greater incentive to undertake the necessary investment to establish IP interconnections.

IP interconnection, in turn, drives a number of substantial consumer benefits. First, it enables the provision of new and innovative products. For example, direct IP interconnection allows for the deployment of HD voice. In addition, having direct control over telephone numbers makes it significantly easier to implement new messaging capabilities.

Second, direct access lowers costs and improves service quality. Lower costs directly benefit consumers through lower prices or better value services. In addition, lower costs generate indirect consumer benefit by supporting further funding of new product development.¹ In addition to lower cost service, service quality is improved by eliminating the conversions between IP and TDM necessary when traffic is sent over the PSTN. During the trial, Vonage found that the routing enabled by direct access measurably improved call quality.

Finally, IP interconnection increases network redundancy. Increased deployment of IP interconnects creates an alternative, redundant transmission path that will exist alongside Vonage's PSTN interconnects.

These substantial benefits are ready to be realized now. The numbering trial demonstrates that there are no technical issues to hold back direct access. Specifically, the Wireline Competition Bureau report on the trial concluded:

The results of this trial reflect that it is technically feasible for interconnected VoIP providers to obtain telephone numbers directly from the numbering administrators. The trial did not identify technical problems regarding number porting, VoIP interconnection, or intercarrier compensation.²

¹ See, e.g., Vonage SEC Form 10-K, Overview and Strategy Section (Feb. 13, 2014), available at <http://www.sec.gov/Archives/edgar/data/1272830/000127283014000020/a10-k2013.htm> (discussing how Vonage is using the profit it realized over the last several years to fund improved domestic and mobile product offerings).

² *Numbering Policies of Modern Communications, et al.*, Report, 2014 WL 964528 at ¶ 1, WC Docket Nos. 13-97, 04-36, 07-243, 10-90 and CC Docket Nos. 95-116, 01-92, 99-200 (Jan. 31, 2014).

Ms. Marlene H. Dortch
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Page 3 of 3

Granting direct access to telephone numbers to qualified interconnected VoIP providers is a simple, concrete step, supported by an extensive record, that the Commission should take now to advance the IP transition. If you have any questions or require additional information, please do not hesitate to contact me at (202) 730-1346 or bstrandberg@wiltshiregrannis.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'BDS' followed by a long horizontal stroke.

Brita D. Strandberg
Counsel to Vonage Holdings Corp.

CC: Commissioner Ajit Pai
Daniel Alvarez
Priscilla Argeris
Amy Bender
Matthew Berry
Rebekah Goodheart