



July 11, 2014

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 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, *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 July 9, Brendan Kasper of Vonage, along with the undersigned, Scott Blake Harris and Kristine Devine, all of Harris, Wiltshire & Grannis LLP, met with Jonathan Sallet, General Counsel of the Commission, Jennifer Tatel of the Office of General Counsel, and Matthew DelNero and Lisa Gelb, both of the Wireline Competition Bureau, to discuss the Commission's open proceeding on direct access to numbers by interconnected Voice over IP ("iVoIP") providers.

Vonage commended the Commission for its proposal to provide iVoIP providers with direct access to numbers, and urged the Commission to adopt this proposal as quickly as possible.¹ Vonage noted that the Commission has a full record that includes a successful trial,² and can adopt its proposal at any time.

¹ *Numbering Policies for Modern Communications, IP-Enabled Services, Telephone Number Requirements for IP-Enabled Services Providers, Telephone Number Portability, Developing a Unified Inter-carrier Compensation Regime, Connect America Fund, Numbering Resource Optimization, 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*, Notice of Proposed Rulemaking, Order, and Notice of Inquiry, 28 FCC Rcd. 5842, ¶ 16 (2013).

Vonage explained that the Commission's proposal, if adopted, will allow iVoIP providers to dramatically expand voluntary IP interconnection arrangements, creating a critical IP interconnection test bed as the Commission considers how to advance the IP transition while protecting the public interest. Vonage noted that even the Commission's limited numbering trial enabled Vonage to negotiate an IP interconnection agreement with Verizon. Based on its experience seeking IP interconnection with other parties, Vonage expects that a wide array of potential IP interconnection partners would be willing to enter into voluntary IP interconnection agreements with iVoIP providers if the Commission grants those providers direct access to numbers. These arrangements, in turn, will provide the Commission with real-world data that it can use to inform the key regulatory decisions it faces as it works to support the ongoing IP transition and deliver the benefits of this transition to the public.

Vonage explained that direct access is necessary to achieve voluntary IP interconnection arrangements because providers must, as a practical matter, be able to see iVoIP providers as the "owners" of a number in industry databases order to route traffic to such providers directly. Without direct access, iVoIP providers' numbers appear to belong to underlying numbering partners, preventing direct routing between iVoIP providers and their potential IP interconnection partners.

Of course, IP interconnection is only one of the benefits that will follow from direct access. During the trial, for example, Vonage found that it was able to provide customers with better call quality where it had direct access. As shown extensively in the record, direct access will also lower costs, enable innovative and advanced services such as HD voice, provide greater transparency in number management, facilitate greater network redundancy, and encourage adoption of bill-and-keep compensation arrangements.³

Finally, Vonage noted that by moving quickly in the wake of its successful numbering trial the Commission can signal its commitment to acting on data gleaned from other ongoing trials. Chairman Wheeler has stated that "it is time to act with dispatch" in moving the IP

² *Numbering Policies for Modern Communications, IP-Enabled Services, Telephone Number Requirements for IP-Enabled Services Providers, Telephone Number Portability, Developing a Unified Inter-carrier Compensation Regime, Connect America Fund, Numbering Resource Optimization*, Report, WC Docket Nos. 13-97, 04-36, 07-243, 10-90, CC Docket Nos. 95-116, 01-92, & 99-200, ¶ 1 (Jan. 31, 2014).

³ See Letter from Brita Strandberg, Counsel, Vonage Holdings Corp., to Marlene Dortch, Secretary, FCC, WC Docket Nos. 13-97, 04-36, 07-243 & 10-90, CC Docket Nos. 95-116, 01-92, & 99-200 at 1-2 (filed Jan. 13, 2014); See Letter from Brita Strandberg, Counsel, Vonage Holdings Corp., to Marlene Dortch, Secretary, FCC, WC Docket Nos. 13-97, 04-36, 07-243, 10-90, CC Docket Nos. 95-116, 01-92, & 99-200 at 2 (filed Apr. 11, 2014); Comments of Vonage Holdings Corp. at 2-3, CC Docket No. 99-200 (filed Mar. 04, 2014).

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transition forward⁴ and many companies have submitted proposals to participate in the various technology transitions trials under the promise of quick action following those trials. Adopting the Commission's existing proposal based on the complete record and successful trial is the logical next step in this effort.

If you have any questions, please do not hesitate to contact me at (202) 730-1346, or bstrandberg@wiltshiregrannis.com.

Respectfully submitted,



Brita D. Strandberg

Counsel to Vonage Holdings Corp.

cc: Jonathan Sallet
Matthew DelNero
Lisa Gelb
Jennifer Tatel

⁴ Tom Wheeler, Chairman, FCC, *The IP Transition: Starting Now* (Nov. 19, 2013), <http://www.fcc.gov/blog/ip-transition-starting-now>.