



PUBLIC NOTICE

Federal Communications Commission
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DA 16-218
February 29, 2016

**INTERCONNECTED VOIP NUMBERING AUTHORIZATION APPLICATION FILED BY
VONAGE HOLDINGS CORP. PURSUANT TO SECTION 52.15(g)(3) OF
THE COMMISSION'S RULES**

STREAMLINED PLEADING CYCLE ESTABLISHED

WC Docket No. 16-49¹

Comments Due: March 15, 2016

On February 18, 2016, Vonage Holdings Corp. (Vonage) filed an application, pursuant to section 52.15(g)(3) of the Commission's rules,² seeking authorization to obtain North American Numbering Plan telephone numbers directly from the Numbering Administrators.³

In its application, Vonage, an interconnected Voice over Internet Protocol (VoIP) provider, included the contact information and acknowledgements required by section 52.15(g)(3)(i) of the Commission's rules.⁴ In addition, Vonage provided evidence that it will be capable of providing service within 60 days of the numbering resources activation date⁵ and certified that it complies with the

¹ We assign WC Docket No. 16-49 for this application and all related filings by the applicant and interested parties. See *Wireline Competition Bureau Announces Commencement Date and Process for Interconnected VoIP Providers to File Applications for Authorization to Obtain Telephone Numbers*, Public Notice, DA 16-129, at 2 (WCB Feb. 4, 2016).

² 47 CFR § 52.15(g)(3).

³ For purposes of this Public Notice the Numbering Administrators include the North American Numbering Plan Administrator and the Pooling Administrator.

⁴ 47 CFR § 52.15(g)(3)(i)(A)-(C), (F).

⁵ 47 CFR § 52.15(g)(3)(i)(D). As evidence of its facilities readiness, Vonage notes that it currently holds approximately 115,000 numbers directly, which it obtained during the Commission's limited trial of interconnected VoIP providers obtaining direct access to numbers. Application of Vonage Holdings Corp. for Authorization to Obtain Numbering Resources, WC Docket No. 16-49, at 2 (filed Feb. 22, 2016) (Vonage Application). Vonage states that it consequently has an Operator Company Name, appears in the Local Exchange Routing Guide and Number Portability Administration Center in the Internet Protocol Enabled Services category, has an agreement in place with its Competitive Local Exchange Carrier (CLEC) partner for routing to Incumbent Local Exchange Carriers (ILECs), and has, in some cases, negotiated direct Internet Protocol interconnection with ILECs. Vonage Application at 2-3. Attached to the Vonage Application is the agreement with its CLEC partner which has been redacted for public inspection, and the interconnection agreement between that partner and a local exchange carrier.

(continued...)

contribution, regulatory fee, and 911 obligations set forth in section 52.15(g)(3)(i)(E).⁶ Vonage also certified that it has the financial, managerial, and technical expertise to provide reliable service,⁷ that none of its key management and technical personnel are being or have been investigated by the Federal Communications Commission, or any law enforcement or regulatory agency, for failure to comply with any law, rule or order,⁸ and that no party to the application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.⁹ Finally, Vonage provided a list of states in which it may request numbers.¹⁰

GENERAL INFORMATION

The Numbering Authorization Application identified herein has been found, upon initial review, to be acceptable for filing as a streamlined application. The Commission reserves the right to return any VoIP Numbering Authorization Application if, upon further examination, it is determined to be defective and not in conformance with the Commission's rules and policies. Pursuant to section 52.15(g)(3)(ii) of the Commission's rules,¹¹ interested parties may file comments **on or before March 15, 2016**. Commenters must serve a copy of comments on Vonage no later than the above comment filing date. Unless otherwise notified by the Commission, Vonage may provide the states in which it intends to request numbers the required 30-day notice on the 31st day after the date of this notice.¹²

Pursuant to section 52.15(g)(3)(ii) of the Commission's rules,¹³ interested parties to this proceeding must file any documents in this proceeding using the Commission's Electronic Comment Filing System (ECFS): <http://apps.fcc.gov/ecfs/>.

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Vonage Application at Attachs. A and B. Vonage emphasizes that it already has in place the necessary procedures to enable it to place numbers into service within 60 days of activation, and that during its six-month direct access technical trial it was able to place numbers into service within, on average, 15-20 days of the activation date of those numbers. Vonage Application at 3.

⁶ 47 CFR § 52.15(g)(3)(i)(E); *see also* 47 CFR §§ 1.1154, 52.17, 52.32, 64.604(c)(5)(iii); 47 CFR parts 9 and 54, subpart H.

⁷ 47 CFR § 52.15(g)(3)(i)(F).

⁸ *Id.*

⁹ 47 CFR § 52.15(g)(3)(i)(G); *see also* 21 U.S.C. § 862.

¹⁰ *See Numbering Policies for Modern Communications et al.*, Report and Order, 30 FCC Rcd 6839, 6850, para. 24 & n.74 (2015) (*VoIP Providers' Direct Access to Numbers Order*) (Commission stated that it "strongly encourage[s] applicants to submit a list of the states in which they intend to request numbers as an attachment to their authorization applications"); *see also* Supplement to the Vonage Application titled "States in Which Vonage May Request Numbers for Its Initial Rollout of Direct Access," WC Docket No. 16-49 (filed Feb. 25, 2016).

¹¹ 47 CFR § 52.15(g)(3)(ii).

¹² 47 CFR § 52.15(g)(3)(iii); *see also VoIP Providers' Direct Access to Numbers Order*, 30 FCC Rcd at 6855, para. 34 (requiring interconnected VoIP providers to file notices of intent to request numbers with relevant state commissions, on an ongoing basis, at least 30 days prior to requesting numbers from the Numbering Administrators).

¹³ 47 CFR § 52.15(g)(3)(ii).

In addition, e-mail one copy of each pleading to each of the following:

- 1) Margoux Brown, Competition Policy Division, Wireline Competition Bureau, margoux.brown@fcc.gov;
- 2) Jean Ann Collins, Competition Policy Division, Wireline Competition Bureau, jeanann.collins@fcc.gov;
- 3) Marilyn Jones, Competition Policy Division, Wireline Competition Bureau, marilyn.jones@fcc.gov.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), 1-888-835-5322 (tty).

The proceeding in this Notice will be treated as a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules. Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter’s written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b).¹⁴ Participants in this proceeding should familiarize themselves with the Commission’s *ex parte* rules.

For further information, please contact Margoux Brown at (202) 418-1584 or Jean Ann Collins at (202) 418-2792.

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¹⁴ 47 CFR § 1.1206(b).