

**STATEMENT OF  
COMMISSIONER MICHAEL O'RIELLY**

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.

While I appreciate all of the work that has gone into this item, the obvious failure here is taking ten years to complete any proceeding. Let's put this debate in perspective: this proceeding has survived four Chairmen and two acting Chairmen; eight Commissioners; and six Wireline Bureau Chiefs. By nearly all accounts, this item, given that it does not consist of the most complex subject matter, epitomizes the federal government bureaucracy. Channeling Commissioner Pai by quoting a movie, there is an appropriate line from one of my favorites, *Grosse Pointe Blank*, when the Jeremy Piven character turns to the John Cusack character and says, "Ten Years Man! Ten! Where've you been for Ten Years?"

Substantively, the tenets of the decisions contained in this item seem anachronistic at this point in time. In fact, I must admit that I find the entire debate rooted in a technology and a system that is fading, and fading fast. Consumers, especially younger consumers, do not care about their specific telephone number, care even less about a specific area code, have little fondness for voice communications and are considering a breakup with traditional SMS texting. To be completely honest, given the use of contact lists in my smartphone and the auspices of the Internet cloud, I do not know a single telephone number, except my own. No one uses phonebooks anymore and telephone numbers are on the way out.

I am also skeptical of the justifications provided in this item. For example, the argument that VoIP providers need direct access to telephone numbers in order to compete with other modes of voice providers seems overblown given that VoIP has become mainstream in today's marketplace, even without this capability. The item notes that the number of residential interconnected VoIP subscribers increased from 19.7 million subscribers in December 2008 to 37.7 million subscribers in December 2013. Indeed, that report marked the first time that VoIP represented more than half of residential wireline connections. Moreover, the item doesn't attempt to quantify any aspect of VoIP costs to obtain numbers from other providers, mainly CLECs, although I've been told anecdotally it is about \$1 million per month for one major provider.

Nonetheless, it is time to bring this proceeding to a close and I will support the item because I don't see any great harm in moving forward, especially since it contains a number of necessary edits I sought. In particular, the item now makes clear that VoIP direct access to numbers is completely voluntary and is in no way mandatory. It also makes crystal clear that the scope of the item is limited to the telephone numbering system of today tied to the PSTN and does not extend to any new developments, such as IP-addresses, ENUM domain names, or any other unique identifiers.