

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
VCXC Petition for Notice of Inquiry on the) GN Docket No. 13-5
Migration to HD Voice)
)

COMMENTS OF VONAGE HOLDINGS CORP.

Vonage Holdings Corp. (“Vonage”) submits these comments in support of the petition of the Voice Communication Exchange Committee (“VCXC”) for a Notice of Inquiry (“NOI”) on the migration to HD voice.¹ Vonage encourages the Commission to issue an NOI exploring the standards development—and related IP transition issues—that will smooth the transition to HD voice.

Issuing an NOI to explore standards development for HD voice is an incremental step the Commission can and should take to promote IP interconnection. Over the years, Vonage has actively encouraged the Commission to take such discrete steps to facilitate the IP transition. Such incremental action can move the industry toward IP networks and interconnection without requiring the Commission to resolve every detail of the complex IP transition.² For instance, most recently, the Commission initiated the trial of direct access to numbers by VoIP providers, which stakeholders agree was a resounding success not only for the VoIP providers that participated but also for the overall IP transition. As a result of the trial, Vonage was able to enter into direct IP interconnection agreements with several providers—a critical step in the

¹ VCXC Petition for Notice of Inquiry on the Migration to HD Voice, GN Docket No. 13-5 (filed Feb. 25, 2014) (“VCXC Petition”).

² See, e.g., Reply Comments of Vonage Holdings Corp., at 6 WC Docket No. 13-97 *et al.*, (filed Aug. 19, 2013).

broader IP transition. In other words, the numbering trial was a small, incremental step that has clearly worked to promote the larger IP transition. An NOI focused on the migration to HD voice is another such incremental step the Commission can and should take.

Vonage has long been a proponent of HD voice.³ As Vonage has made clear in other proceedings, the transition to IP networks—and to direct IP-to-IP interconnection—allows providers to improve services to consumers, including by deploying such advanced features as high-definition voice (“HD voice”).⁴ HD voice will enhance the quality of voice communications, of course. But the move to HD voice is likely to have other benefits as well, as pointed out by VCXC, including “providing a clear means for tracking progress as the IP transition unfolds” and “serving as a foundation to promote the benefits of the IP transition.”⁵

Vonage agrees that deployment of HD voice will allow providers and the Commission to promote the deployment of IP networks and interconnection—consumers can understand how the IP transition will benefit them when they are able to conduct voice communications with

³ See, e.g., Letter from Brita Strandberg, Counsel, Vonage, to Marlene H. Dortch, Secretary, FCC, at 2 WC Docket No. 13-97 *et al.*, (filed Apr. 11, 2014) (“Vonage Apr. 11 Letter”) (“direct IP interconnection allows for the deployment of HD voice”); Letter from Brita Strandberg, Counsel, Vonage, to Marlene H. Dortch, Secretary, FCC at 1, WC Docket Nos. 10-90 & 05-337, GN Docket No 09-51, CC Docket Nos. 01-92 & 96-45, (filed Feb. 12, 2014) (“Vonage seeks IP interconnection agreements because the exchange of traffic in IP delivers substantial public interest benefits including cost reduction, improved service quality, and the ability to deliver advanced services such as HD voice”); Comments of Vonage Holdings Corp. at 6, WC Docket No. 13-97 *et al.* (filed July 13, 2013) (“End-to-end IP also allows for enhancements like HD voice codecs”); Letter from Brita Strandberg, Counsel, Vonage, to Marlene H. Dortch, Secretary, FCC at 2, CC Docket No. 99-200, (filed July 31, 2012) (“Where Vonage can achieve IP interconnection, it has the opportunity to work with directly connected providers to implement high definition audio codecs to improve the quality of voice service and offer its customers end-to-end HD voice.”).

⁴ See, e.g., Comments of Vonage Holdings Corp. at 6, WC Docket No. 13-97 *et al.* (filed July 13, 2013) (“End-to-end IP also allows for enhancements like HD voice codecs”).

⁵ VCXC Petition at 3.

high definition audio, where they may be less aware of the benefits of other features like the move to bill-and-keep or away from legacy copper facilities.

More importantly, Vonage agrees that HD voice can demonstrate the progress of the IP transition. Indeed, that is already happening—as a result of the Commission’s decision to conduct a trial of direct access to numbers by VoIP providers, Vonage has been begun discussions regarding deployment of HD voice services where it has entered into voluntary agreements for IP-to-IP interconnection.⁶

VCXC’s petition asks the Commission to recognize that even while some providers are moving at full speed to implement IP connectivity, many other providers lag behind—raising the risk of “fragmentation of voice services.”⁷ Vonage agrees that this risk calls for the Commission to take the lead in exploring how best to standardize the transition to HD voice within the larger IP transition context. Good standards development is a key way that the Commission can facilitate the move to IP networks and interconnection by providers that may otherwise be reluctant, by providing a clear path forward for service enhancements like HD voice.

As the Commission explores ways to encourage providers to move to IP networks and interconnection, it should seek comment on the necessary standards for enhanced services that will be available to consumers. By issuing an NOI on the HD voice migration, the Commission can not only gain a deeper understanding of what providers are currently doing with respect to HD voice deployment, but it can also gather information on the hurdles and roadblocks that other providers face.

Finally, Vonage’s experience shows that voluntary commercial arrangements can lead to the deployment of new and advanced services like HD voice. Thus in any NOI on this the

⁶ Vonage Apr. 11 Letter at 2.

⁷ VCXC Petition at 4.

migration to HD voice, the Commission should take care to support ongoing efforts to implement HD voice through voluntary commercial agreements. The IP transition will not be a flash cut and, indeed, such commercial agreements are a critical tool for providers seeking to deploy HD voice for the benefit of their customers.

Respectfully submitted,



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