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COMMISSION
CLERK

May 21, 2013

Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: FCC No. 13-51, Numbering Policies for Modern Communications, et al.,
Notice of Proposed Rulemaking, Order and Notice of Inquiry,
WC Dkt. No. 13-97, et al. (April 18, 2013) ("Order")

Dear Ms. Cole:

Pursuant to paragraph 101 of the above-captioned Order, please find enclosed the "numbering proposal" of SmartEdgeNet, LLC ("SEN").

SEN is a provider of interconnected voice over Internet protocol ("interconnected VoIP") and other services. The Federal Communications Commission ("FCC") has granted SEN a six-month waiver from its telephone number assignment rules in order to conduct a trial into the feasibility of allowing interconnected VoIP providers to obtain and assign telephone numbers to their interconnected VoIP customers directly, rather than through a third party, such as a telecommunication service provider. As indicated in its filing before the FCC, SEN will be conducting the trial in the Florida communities of Celebration (LATA 45807) and Keys (LATA 46017).

Please do not hesitate to contact me if you have any questions.

Respectfully,

Randall B. Lowe
Counsel to SmartEdgeNet, LLC

Anchorage
Bellevue
Los Angeles

New York
Portland
San Francisco

Seattle
Shanghai
Washington, D.C.

NO NUMBER NUMBER DATE

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FPSC-COMMISSION CLERK

May 17, 2013

BY ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **Numbering Plan Proposal of SmartEdgeNet, LLC**
(WC Docket No. 13-97, WC Docket No. 04-36, WC Docket No. 07-243,
CC Docket No. 95-116, CC Docket No. 01-92, WC Docket No. 10-90,
CC Docket No. 99-200)

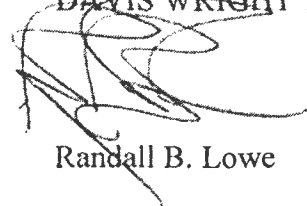
Dear Ms. Dortch:

Pursuant to paragraph 101 of the Commission's Notice of Proposed Rulemaking, Order and Notice of Inquiry in the above-referenced dockets that was released on April 18, 2013, SmartEdgeNet, LLC, as an interconnected VoIP provider with a pending petition for a limited waiver of section 52.15(g)(2)(i) of the Commission's rules, hereby submits its numbering plan proposal.

Please direct any correspondence concerning this matter to the undersigned counsel.

Sincerely,

DAVIS WRIGHT TREMAINE LLP



Randall B. Lowe

Attachments

Numbering Plan Proposal of SmartEdgeNet, LLC ("SEN")

- A. The following are the LATAs in which SEN would like to have numbers directly assigned, the amount of numbers and the number of ports:

LATA 45807 (Celebration FL) Direct allocation 1,000 block 900 for new customers
LATA 46017 (Keys FL) Direct Allocation 1,000 block, Port in 200 TNs
LATA 552 (Dallas TX) Direct Allocation 1,000 block, Port In 250 TNs

SEN is requesting number blocks in three LATAs in order to properly test routing multiple LRNs are required.

- B. The following is a description of the phase-in process to implement the trial:

Phase I - Initial Setup

1. Acquire an OCN from NECA
2. Setup, test and turn up of SIP trunks with Neutral Tandem (Inteliquent)
3. Acquire direct allocations in desired LATAs from NANPA
4. Populate LERG with LRNs for assigned T-Blocks, and nominate Neutral Tandem as the "Local Tandem" and "Access Tandem" for each T-Block LRN

Phase II - Testing and Verification of NANPA assigned T-Blocks

1. Test and turn up of newly assigned T-Block TNs with friendly test sites in each trial LATA.
2. Test calls from various markets, including ILECs, cellular and cable carriers, to verify routing and call completion.
3. Test E911 services
4. Mitigate any issues discovered in this phase

Phase III - Testing and Verification of LNP

1. Initiate LNP
2. Upon LNP completion, update LERG with appropriate LRN
3. Test calls from various markets including ILECs, cellular and cable carriers, to verify routing and call completion
4. Test E911 services
5. Mitigate any issues discovered in this phase

Phase IV - Testing and Verification of live customers - NEW TNs (This phase will only be implemented once phases 1-3 have been extensively tested and their success validated.)

1. Test and turn up of newly assigned T-Block TNs with customers in each trial LATA.
2. Test calls from various markets, including ILECs, cellular and cable carriers to verify routing and call completion.
3. Test E911 services

4. Mitigate any issues discovered in this phase

Phase V - Testing and Verification live customers – LNP (This phase will only be implemented once phases 1-3 have been extensively tested and their success validated.)

1. Initiate LNP
2. Upon LNP Completion, update LERG with applicable LRN
3. Test calls from various markets including, and most importantly ILecs, to verify routing and call completion.
4. Test E911 services
5. Mitigate any issues discovered in this phase

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
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)	

DECLARATION OF TERRENCE M. PECK

1. My name is Terrence M. Peck. I am Chief Executive Officer ("CEO") of SmartEdgeNet, LLC ("SEN"). This Declaration supports the numbering plan proposal filed by SEN in the above-captioned proceeding.

2. In my capacity as CEO of SEN, I have the authority to make the certification of compliance set forth below.

3. On behalf of SEN, I hereby certify that SEN will comply with the terms and conditions of the waiver granted to SEN in the *VoIP Numbering Trial Order* in this proceeding.¹

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 5/17/13

Terence M. Pusk
Name

¹ *Numbering Policies for Modern Communications, et al.*, Notice of Proposed Rulemaking, Order and Notice of Inquiry, ¶ 101 WC Dkt. 13-97, *et al.*, FCC No. 13-51 (April 18, 2013).