

William B. Wilhelm, Jr.  
Bingham McCutchen LLP  
3000 K Street, N.W., Suite 300  
Washington, DC 20007-5116  
Tel: (202) 373-6000  
Fax: (202) 424-7645

July 19, 2006

**By Overnight Mail and Electronic Filing**

Mary Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

Bingham McCutchen LLP  
Suite 300  
3000 K Street NW  
Washington, DC  
20007-5116  
202.424.7500  
202.424.7647 fax

bingham.com

Boston  
Hartford  
London  
Los Angeles  
New York  
Orange County  
San Francisco  
Silicon Valley  
Tokyo  
Walnut Creek  
Washington

**Re: Docket No. 06-8; Investigation to Establish Retail Billing and Termination Practices for Telecommunications Carriers**

Dear Ms. Cottrell:

Vonage Holdings Corp. ("Vonage"), by undersigned counsel, hereby joins the Reply Comments filed by 8x8, Inc. ("8x8"), Lightyear Network Solutions, LLC ("Lightyear"), VoicePulse Inc. ("VoicePulse") (together, the "Commenters") with the Department of Telecommunications and Energy ("Department"), and desires to be associated with that filing.

Like the Commenters, Vonage is a provider of interconnected Voice over Internet Protocol ("VoIP") services. As noted in the above-referenced Reply Comments, consumer protection and service quality obligations imposed on monopoly providers of telephone service must be carefully evaluated before imposing similar requirements on VoIP providers. VoIP providers operate in a competitive marketplace and technological differences make certain practices (such as "slamming") irrelevant in the VoIP context. Further, given the Federal Communications Commission's ("FCC") open docket relating to VoIP services, Vonage joins the Commenters in strongly recommending that the Department defer any further consideration of these matters at least until the FCC concludes its ongoing proceeding.

Please contact the undersigned should you have any questions concerning this filing.

Sincerely,



William B. Wilhelm, Jr.

Counsel for 8x8, Inc., Lightyear  
Network Solutions, LLC,  
VoicePulse Inc. and Vonage  
Holdings Corp.

cc: Andrea Saia, DTE