

All,

Echoing some of the sentiment already conveyed by Jerry, Jim, and Bob S., and as stated in Monday's meeting, Comcast has only tangential concerns regarding VNXX issues at this time. However, the MTA rewrite 'process' revealed that the potential for harm resulting from an otherwise noble intent is real and can never be discounted.

Comcast therefore reiterates its request to be made a standing member of the VNXX workgroup. Comcast, and cable more generally, represents a formidable, facilities-based provider of competitive voice services. Cable has interests, as do cable's customers, that are not redundant of any others' and merit direct representation.

That having been said, I have done some small research on the topic generally. Rather than regale parties with the voluminous fruits of those labors – much of this has been supplied already and will properly come out through the workgroup's progression – I will offer what I believe is a very succinct definition of VNXX (not of my crafting, but lifted from that research):

**Calls that physically terminate in a location other than the exchange area associated with the NXX used are known as Virtual NXX (VNXX) calls. Any individual telephone number in an LNP-capable exchange can be a VNXX number.**

In closing I would direct your attention back to the *second* sentence above. Much of the discussion Monday, and indeed much of the documentation I was able to review via research, was centered upon the notion of an entire NXX having an *identity*. I would gently suggest that current reality, future activity, and that second sentence may indicate that such a notion has outlived its validity.

Regards,

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