

October 17, 2019

**VIA ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

**Re: WC Docket No. 05-196, Compliance Letter from Metro Fibernet, LLC**

Dear Secretary Dortch:

On behalf of Metro Fibernet, LLC, attached please find its Compliance Letter required by Section 9.5(f) of the Commission's rules. 47 C.F.R. § 9.5(f). Metro Fibernet, LLC provides interconnected VoIP services as defined in Section 9.3 of the Commission's Rules.

Respectfully submitted,

*/s/ Robert A. Bye*

Robert A. Bye

## **Metro Fibernet, LLC – Compliance Letter**

**October 17, 2019**

### **Background**

Metro Fibernet, LLC (“MetroNet”) is constructing a next-generation Gigabit fiber network to homes and businesses in select markets. MetroNet is offering voice, data and video services for residential and business customers which are connected to its fiber network. Services offered include residential phone, Hosted PBX, SIP Trunking, and Dedicated Internet. MetroNet’s VoIP services fall within the FCC’s definition of “interconnected VoIP service.”

### **Compliance with 47 C.F.R § 9.5 – Interconnected Voice over Internet Protocol Services MetroNet’s 911 Solution:**

- MetroNet provides E911 services to its VoIP customers using the trusted third party provider, Onvoy, LLC d/b/a Inteliquent.
- As part of the provision of E911 service, MetroNet transmits all 911 calls to Inteliquent along with ANI and the caller’s registered location for each call. Inteliquent routes the call to the proper PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller’s registered location.
- Prior to the initiation of services, MetroNet obtains the physical location at which the service will first be utilized. This service address serves as the registered location. All VoIP customers are required to provide a physical location for all telephone numbers.
- MetroNet requires all customers to sign a Service Order for services which forms the agreement ("Agreement") between the Customer and MetroNet. The Agreement advises subscribers of the circumstances under which 911/E911 service may be limited or unavailable through our voice services, including electrical power outages and broadband connection disruptions or outages. The Agreement prohibits the Customer from moving MetroNet’s equipment from the location in which it has been installed. The Agreement also states MetroNet utilizes telephone numbers that are assigned in accordance with applicable numbering rules and that our voice services cannot accommodate the assignment of a telephone number outside of the telephone rate center to which that number is appropriately assigned.
- MetroNet does not offer nomadic service to its customers. If a customer desires to move to a new location, the customer must contact MetroNet to determine if the new service location is serviceable by MetroNet. Customers can contact MetroNet’s Customer Care at 1-877-407-3224, online at [www.metronetinc.com](http://www.metronetinc.com) or in person at any of our local offices. If the new location is serviceable, MetroNet will schedule a new installation appointment and dispatch a technician to provision VoIP service at the new location. As with an initial installation, the technician will install, if necessary, any customer premise equipment necessary to access MetroNet’s interconnected VoIP service. MetroNet will load the updated Registered Information into the ALI database in a timely manner.

- All new customers are provided a MetroNet warning sticker to place on or near their VoIP phone. Existing customers can obtain additional supplies of stickers at any time. The text of the sticker is as follows:

**Warning:**

**E911 Service May be Limited or Unavailable**

Emergency Calling Service/E911 will not be available if

1. Your broadband connection has failed or disconnected
2. Your electrical power is disrupted
3. The current location of your handset has not been registered with your service provider

If you are unable to immediately complete a 911 call,  
PLEASE USE THE EMERGENCY PHONE NEAREST YOU

- All customers are asked to acknowledge/verify that they understand their obligations and 911/E911 Service limitations in the contract between the customer and MetroNet for VoIP services. This contract serves as MetroNet's record of acknowledgment from each customer (subscriber).

**Contact Information for MetroNet Concerning Compliance with the FCC's VoIP E911 Order:**

The contact person for MetroNet's compliance with the FCC's VoIP Order is:

Randy Kiesel  
Regulatory Manager  
3701 Communications Way  
Evansville, IN 47715  
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