

# RSFIBER

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May 13, 2016

Marlene H. Dortch  
Office of Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: VoIP E911 Compliance Letter of RS Fiber Cooperative  
WC Docket Nos. 05-196, 04-36

Dear Ms. Dortch:

RS Fiber Cooperative ("RS Fiber") hereby submits this letter in compliance with the Commission's First Report and Order in the above referenced dockets (the "VoIP 911 Order").

RS Fiber is offering fixed, non-nomadic telephone service utilizing internet protocol technology ("VoIP") service to customers with customer premises equipment which requires said protocol. RS Fiber provides 911/E911 service to 100% of its customers in compliance with the Federal Communications Commission's ("Commission") rules. RS Fiber does not plan to offer or provide nomadic VoIP service.

As a CLEC, RS Fiber is authorized by the Minnesota Public Utilities Commission to provide local exchange service in Minnesota, RS Fiber is currently interconnected with the public switched telephone network ("PSTN") and the Wireline E911 Network.

I. **Scope of Coverage of 911 Solution.**

All RS Fiber's customers have access to 911 service in compliance with the rules established by the Commission in its VoIP 911 Order.

A. **911 Routing Information/Connectivity to Wireline E911 Network.**

RS Fiber routes all 911 calls through the local switch that RS Fiber leases from a third party switch vendor and over-separate dedicated 911 interconnection trunks to the appropriate selective router for delivery to the appropriate PSAP. As such, 100% of RS Fiber's transmission of 911 calls is delivered through the use of ANI via the dedicated wireline E911 network.

**RS Fiber Cooperative • PO Box 326 • Gaylord, MN 55334**  
(800) 628-1754 • www.rsfiber.coop

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**B. Transmission of ANI and Registered Location Information.**

RS Fiber sends all 911 calls to the appropriate selective router where a database “dip” occurs, in turn causing appropriate name, address, and number information to be routed to the appropriate PSAP along with the 911 call. RS Fiber utilizes this process on all of its 911 calls. Accordingly, for all RS FIBER 911 calls the ANI and the 911 caller’s registered location is transmitted to the PSAP. All of the answering points to which RS FIBER transmits 911 information are capable of receiving name, address and phone number relating to 911 calls (i.e., are E911 capable).

**C. The 911 Caller’s Registered Location Will be Available to the PSAP From or Through the Appropriate ALI Database.**

RS FIBER will submit each customer’s service address (registered location) information to the appropriate ALI database prior to initiating service. With respect to any and all changes in the customer’s registered location, RS FIBER will update the ALI database in a timely manner.

**II. All RS FIBER’s Customers will be Advised and Must Acknowledge That They have Been Informed of and Understand the Limitations of RS FIBER’s E911 Service Before VoIP Service Will be Provided.**

RS FIBER requires all customers to sign an agreement for services (“Service Agreement”). The Service Agreement prohibits customers from moving or relocating RS FIBER provided customer premises equipment. The Service Agreement also informs customers that RS FIBER’s telephone service, including E911 service, will not operate if the RS FIBER provided customer premises equipment is moved to another location. The Service Agreement further informs customers that in the event of a power outage RS FIBER’s telephone service including E911 service may not be operable.

RS FIBER also requires its customers to sign an E911 Disclosure Notice before VoIP service will be provided. The E911 Disclosure Notice explains in plain language the circumstances under which RS FIBER’s E911 service may not be available. Such circumstances include the moving or relocation of RS FIBER provided customer premises equipment, the suspension of RS FIBER VoIP service, a disruption of the broadband connection and a power outage. By signing the E911 Disclosure Notice RS FIBER’s customers acknowledge and agree that they have been advised and understand RS FIBER’s E911 service limitations. RS FIBER keeps a record of the affirmative acknowledgements by every customer.

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Prior to initiation of service RS FIBER will provide its customers with stickers to be placed on and/or near each telephone and the RS FIBER provided customer premises equipment reminding customers of the RS FIBER E911 service limitations.

RS FIBER VoIP customers are informed by RS FIBER that the VoIP Service provided by RS FIBER is a fixed, non-nomadic service that may be used only at the customer's service address (i.e., registered location). RS FIBER will inform its VoIP customers: (1) at the time of the initial service request, (2) at the time of installation, (3) in the Service Agreement, and (4) in the E911 Disclosure Notice.

### III. Obtaining Initial Registered Location Information.

RS FIBER obtains registered location information for all of its customers at the time of the customer service request. A customer cannot obtain service from RS FIBER without first providing a service address, which also serves as the registered location. When new subscribers order VoIP service, they will be required to provide and confirm the physical location of their service address during the order process. This will be required whether service is requested over the telephone, via the internet or in person at a RS FIBER customer service location. In all cases an installation date for each customer will be arranged. As part of the installation service call, RS FIBER technicians will verify that the address information that the customer provided RS FIBER during the initial service request is correct. In sum, RS FIBER will collect service location (registered location) information from 100% of its customers prior to the initiation of service.

### IV. Obtaining Updated Registered Location Information.

As stated, RS FIBER does not offer nomadic service to its customers. If a customer desires to move to a new location the customer must notify RS FIBER and disclose the new service location. At the time of service installation, RS FIBER provides to its customers an E911 Disclosure Notice (i.e., an acknowledgement form) and stickers detailing the requirement that a customer notify RS FIBER in the event the customer desires to relocate service to a new address (registered location).

Customers can provide notice of their relocation to RS FIBER by calling a RS FIBER customer service representative or visiting a local RS FIBER retail office. When the customer notifies RS FIBER of the customer's intent to relocate, RS FIBER 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, a terminal adapter and perform any necessary inside wiring work to ensure that the VoIP service operates throughout the customer premise. Apart from service activation, this service call also allows RS FIBER to verify the customer's new service address (registered location).

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V. Technical Solutions for Nomadic Subscribers.

RS FIBER's VoIP service is a fixed, non-nomadic service. RS FIBER has no plans to offer nomadic service in the future. RS FIBER's VoIP service is designed to operate only when provided over RS FIBER's facility based broadband access and the switching and routing facilities provided by Hiawatha Broadband Communications, Inc. Accordingly, devices used in connection with RS FIBER's VoIP service are not designed to be moved or relocated. The technical solutions that have been designed "to ensure that subscribers have access to 911 service whenever they use their service nomadically" are not applicable to the fixed, facilities-based VoIP service provided by RS FIBER.

VI. RS FIBER Employee Responsible for E911 Compliance.

Toby Brummer  
General Manager  
310 Main Avenue  
PO Box 326  
Gaylord, MN 55334  
PH: 800-628-1754  
Email: toby.brummer@rsfiber.coop

Please contact the undersigned at the telephone number listed above if you have any questions about this filing.

Respectfully submitted,



Rochelle Pervisky  
Vice President of Regulatory  
HBC

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cc: Kathy Berthot, Deputy Chief, Spectrum Enforcement Division, Enforcement Bureau,  
[kathy.berthot@fcc.gov](mailto:kathy.berthot@fcc.gov) (via e-mail)

Janice Myles, Competition Policy Division, Wireline Competition Bureau,  
[janice.myles@fcc.gov](mailto:janice.myles@fcc.gov) (via e-mail)

Carol Simpson, Policy Division Public Safety and Homeland Security Bureau  
Federal Communications Commission, [carol.simpson@fcc.gov](mailto:carol.simpson@fcc.gov) (via e-mail)

Best Copy and Printing, Inc. (BCPI), [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com) (via e-mail)

Terri Firestein, CCG Consulting, [tfireccg@myactv.net](mailto:tfireccg@myactv.net) (via e-mail)

Toby Brummer, General Manager, RS Fiber Cooperative, [toby.brummer@rsfiber.coop](mailto:toby.brummer@rsfiber.coop) (via  
email)