



1900 M St. NW • Suite 800 • Washington, DC 20036

11 May 2005

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

Re: WCB Docket No. 04-36

Dear Ms. Dortch:

On May 11, 2005, the undersigned, together with Jonathan Lee and Stephen Trotman of CompTel/ALTS, held separate meetings with Michelle Carey of the Office of Chairman Martin, Lauren Belvin of the Office of Commissioner Abernathy, Jessica Rosenworcel of the Office of Commissioner Copps, and Scott Bergmann and Barry Ohlson of the Office of Commissioner Adelstein. At each meeting, representatives of CompTel/ALTS made the same presentation regarding the Commission's pending consideration of E-911 rules related to providers of VoIP services. Specifically, CompTel/ALTS made the following arguments:

- (1) The Commission must consider record evidence demonstrating that the majority of VoIP end users subscribe to fixed VoIP services, and that an E-911 solution that addressed fixed VoIP services would therefore address the majority of consumer users.
- (2) The Commission must consider record evidence demonstrating that providers of so-called "nomadic" VoIP services – including both non-native number assignments and physical relocation of VoIP equipment – cannot implement an E-911 solution in the same time frame as providers of fixed VoIP services. As such, the Commission must address record evidence that sets out the additional technological solutions that must be implemented before end users of nomadic VoIP can access full E-911 capabilities.

(3) Because incumbent local exchange carriers (ILECs) generally control access to all points of interconnection necessary to provide E-911 services, including so-called selective routers and trunks that connect public safety access points (PSAPs) to the public switched network, the Commission must include in its E-911 implementation mandate a concrete requirement that such facilities and services as are necessary to provide E-911 services are available to non-ILEC carriers. Specifically, the Commission must require ILECs to provide, at nondiscriminatory rates, terms, and conditions, requesting carriers with access to all trunking, routers, and related facilities and equipment necessary to provide E-911 services. Absent such an obligation, ILECs will have both the ability and the incentive to deny competing carriers access to the facilities and services needed to comply with the Commission's E-911 mandates.

Respectfully submitted,

/s/ Jason Oxman

Jason Oxman
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CompTel/ALTS