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May 16, 2005

**EX PARTE**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *IP-Enabled Services Rulemaking*, WC Docket No. 04-36

Dear Ms. Dortch:

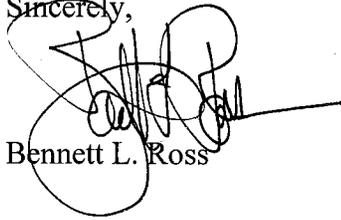
At the request of Commission staff, BellSouth Corporation (“BellSouth”) submits this letter to clarify its May 12, 2005 ex parte concerning the provision of 9-1-1 emergency services to Voice Over Internet Protocol (“VoIP”) customers. In its ex parte, BellSouth stated that it was “unrealistic” to expect that “E-9-1-1 and 9-1-1 functionality will be fully implemented for nomadic VoIP purposes by the end of this year.” The functionality to which BellSouth was referring is the I2 solution on which the industry is currently working under the auspices of the National Emergency Number Association (“NENA”). As explained in its May 12, 2005 ex parte, solutions for delivering E-9-1-1 services to VoIP customers at their “fixed” or primary residential or business location are currently available.

In the interim, however, other alternatives exist that would allow all interconnected VoIP providers to offer E-9-1-1 and 9-1-1 services in connection with the nomadic use of VoIP, and BellSouth did not mean to suggest otherwise. One such alternative is the offering outlined in BellSouth’s May 12, 2005 ex parte by which VoIP providers have access to BellSouth’s selective routers and the Automatic Location Identification (“ALI”) database. As BellSouth explained in its ex parte, this offering provides the same access as that which BellSouth currently provides to CMRS carriers. The only difference is that changes may need to be made to the interface to the ALI database to allow for updating of location information for nomadic use. With such access, a VoIP provider, by itself or working with one of several existing third-party vendors, could establish the necessary processes by which subscriber location records can be updated when a VoIP customer uses the service nomadically. BellSouth is prepared to work cooperatively to assist any VoIP provider in establishing such processes, which BellSouth believes could reasonably be implemented within 120 days.

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Please include a copy of this letter in the record in the above-referenced proceedings.  
Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Bennett L. Ross", written over the word "Sincerely,". The signature is stylized and somewhat illegible due to overlapping loops and a long horizontal stroke extending to the right.

Bennett L. Ross

BLR:kjw  
#585600

cc: Dan Gonzalez  
Michelle Carey  
Jessica Rosenworcel  
Lauren Pete Belvin  
Scott Bergmann  
Tom Navin  
Julie Veach  
Pam Arluck  
Christie Shewman  
Nicholas Alexander  
Tim Stelzig