

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matters of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
E911 Requirements for IP-Enabled Service Providers)	WC Docket No. 05-196
)	

REPLY COMMENTS OF METROTEL

MetroTel is a privately held company that serves customers primarily in Texas. MetroTel provides VOIP services that are identical to Inter-Exchange Carriers commonly referred to as “long distance”.

The comments filed thus far have not addressed the concerns of VOIP companies that do not provide local exchange like services.

MetroTel provides “dedicated” inbound 800 or toll free service to its customers that is transported via VOIP. This service is identical to traditional carriers’ offerings of dedicated toll free service that is delivered via traditional wire line service on a T1, T3, or ATM connection. MetroTel also provides “dedicated” outbound long distance that is provisioned in the same manner as its inbound toll free service.

MetroTel’s customers take delivery at their PBX or switch and those customers have additional connections to an ILEC or CLEC for their local exchange service and E911. The VOIP Inter-exchange customer, just like the traditional wire line Inter-exchange customer, has no expectation of E911 services over the Inter-exchange trunks.

MetroTel can deliver Inter-exchange traffic via ATM, which is a packet based protocol used to deliver voice services and is not subject to providing E911 under the current proposal if the service is inter-exchange only.

An example of existing packet switched Inter-exchange traffic takes place within the Verizon network. Inter-exchange calls destined for Dublin, VA., are routed through one of Verizon's ATM gateways to the Verizon ATM tandem (RONKVALKDC1) and delivered to Dublin, VA., all on packet switched voice via ATM.

ATM is packet-based protocol. The packets in ATM are commonly referred to as "cells" and devices on the network have addresses similar to IP addresses, domains and sub domains.

MetroTel asks the FCC to adopt, or to clarify or modify its recommendations in this cause to define and specifically exclude inter-exchange type services from the requirement of providing E911 solely on premise that it is delivered using a specific data protocol - VOIP.

MetroTel agrees with the FCC's interest in providing for the public's safety and the public's expectation of E911 service to Local Exchange-like customers.

MetroTel urges the FCC to adopt rules that apply to the type of service provided, not the method of transportation used to deliver the service.

Respectfully Submitted,

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