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July 13, 2005

Frank Punzo  
9-1-1 Coordinator  
Department of Public Property  
Room 702, City Hall  
Philadelphia, PA 19102

RE: Network Testing for AT&T/TCG E911 Capability for Voice over  
Internet Protocol

Dear Mr. Punzo:

As you know, for the past several months, AT&T has been seeking your assistance to allow AT&T to conduct the necessary controlled testing of Enhanced 911 capability for AT&T CallVantage(sm) Voice over Internet Protocol ("VoIP") service within the City of Philadelphia. Although AT&T has been able to resolve a number of issues delaying the testing, there are a few issues that continue to create a problem. Those issues include AT&T's concern regarding any testing scenario which would require AT&T to turn down existing 9-1-1 facilities presently serving a large number of land line customers to test default facilities; and the availability of operator services for VoIP customers.

I am sure that I do not need to highlight for you the urgency with which AT&T and all responsible VoIP providers are working to implement E911 capability for VoIP customers. On June 3, 2005, the Federal Communications Commission ("FCC") released its Order mandating E911 functionality for all interconnected VoIP providers within 120 days of the

effective date of that Order.<sup>1</sup> Thus, AT&T will be required to implement E911 service for its VoIP customers nationwide by November 28, 2005. Equally as significant, AT&T has been seeking to bring enhanced public safety capability to its VoIP customers in Philadelphia for several months. For these reasons, AT&T hopes to complete the necessary E911 capability testing as soon as possible. As the FCC noted in its Order:

We believe that it is critically important to impose E911 obligations on interconnected VoIP providers and to set firm but realistic target deadlines for the implementation of those requirements. At the same time, however, we allow the providers flexibility to adopt technological solutions that works best for them. In the Order, we take the necessary steps to promote cooperative efforts by state and local governments, public safety answering point (“PSAP”) administrators, 911 systems service providers, and interconnected VoIP providers that will lead to improved emergency services.<sup>2</sup>

With the issuance of the FCC Order and its clear intent to maintain its jurisdiction over E911 services for interconnected VoIP providers, it is imperative that AT&T be able to complete E911 capability testing. I understand that you spoke with Richard Kaplan of AT&T today, and that together you have begun the necessary discussions to address the remaining problems so that AT&T may meet both its compliance requirements and the emergency service needs of its customers. I encourage you to continue to work with Mr. Kaplan and Ms. Criscuolo to resolve these issues in the near future.

Thank you again for your continued cooperation. Please feel free to contact me if you have any questions or concerns.

Very Truly Yours,

Deborah S. Waldbaum  
Senior Attorney

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<sup>1</sup> *In the Matter of IP-Enable Services and E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, WC Docket No. 04-36 and WC Docket 05-196, FCC -5-116 (rel. June 2, 2005) (“VoIP E911 Order”).

<sup>2</sup> *Supra*, at ¶5.

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cc: Richard Kaplan, AT&T  
Carol Criscuolo, AT&T  
Robert Sutton, Esq., Office of City Solicitor