

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

E911 Requirements for IP-Enabled
196
Service Providers

WC Docket No. 05-

**COMMENTS OF STAFF OF THE
CORPORATION COMMISSION OF THE
STATE OF KANSAS**

**IN REPOSE TO THE FURTHER NOTICE
OF PROPOSED RULEMAKING**

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August 7, 2005

I. Introduction

1. On June 3, 2005, the First Report and Order and Notice of Proposed Rulemaking (NPRM) in WC Docket No. 05-196 was released. Comments were invited by ¶ 65 of the NPRM. The following comments relate to concerns of the Staff of the State Corporation of the State of Kansas (Staff) with the identification of VoIP service providers.

II. Comments

2. The NPRM's ¶ 60 refers to the emerging roles for states in connection with the E911/VoIP matters. Staff is concerned that there appears to be no planned means of identifying the VoIP service providers. In Kansas (and, presumably, in other states) such providers are not required to be certificated, file tariffs or in any specific way identify themselves as VoIP service providers. As the industry moves forward into this new technology era there will, no doubt, be a need to identify and communicate with these entities for a variety of reasons: compliance matters, complaint

investigations and possible assessments for 911 and/or Universal Service support, to name just a few.

3. Such identification information will be needed regardless of which authority undertakes responsibility for the above functions. Left unaddressed by the Federal Communications Commission (Commission), the states and/or various industry groups may endeavor to create and maintain such information that results in a fragmented method, and certainly not as efficient and comprehensive as a *single national* registry could be.

4. The Commission's Order, at ¶¶ 50 – 51, acknowledged the need for some level of identification and notification of compliance with respect to E911 matters by requiring a Compliance Letter from the VoIP service providers. However, there does not appear to be a plan to share this information with the states, maintain the information or any indications as to the level of detail to be provided.

5. Staff recommends a VoIP national registry containing at least the service provider's d/b/a name, locations served (at the rate center or locality level), contact names for regulatory and

complaint matters along with their respective telephone numbers and e-mail addresses. Additional contact information may be required as the need arises. VoIP service providers should be required to maintain such information on a current basis.

Respectfully Submitted,

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