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August 10, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**Re: WC Docket No. 05-196 – Onvoy, Inc. Subscriber Notification and
Acknowledgement Status and Compliance Report**

Dear Ms. Dortch:

On behalf of Onvoy, Inc., enclosed please find a Subscriber Notification and Acknowledgement Status and Compliance Report, as required in WC Docket No. 05-196. See Public Notice, DA 05-2085 (released July 26, 2005).

Sincerely,

Glenn S. Richards
Counsel for Onvoy, Inc.

Attachment

Onvoy, Inc.'s Subscriber Notification and Acknowledgement Status and Compliance Report

August 10, 2005

Background

Onvoy is a regional telecommunications and Internet services provider serving Minnesota's independent telephone companies, global interexchange carriers, enterprise clients and the State of Minnesota. Onvoy's VoIP network is a private, secure statewide (Minnesota) network for voice, video, Internet access and data. Onvoy provides two VoIP services that appear to fall within the FCC's definition of "interconnected VoIP service." Onvoy's sells its private VoIP solution to enterprise clients located in Minnesota. Onvoy's private VoIP solution has been fully E-911 compliant since its inception in 2001.

Onvoy also provides a VoIP service called Bandwagon. This service is for Onvoy employees to use when working from home. This service requires a broadband connection and an ATA device. Onvoy provides E-911 capability with this service at the employees' registered location.

Actions taken to advise VoIP customers

Onvoy has taken the following actions to advise each VoIP service subscriber in plain language how Onvoy's 911 service works and what limitations exist. The relevant dates and contact methods used by Onvoy are as follows:

- Onvoy sent a letter to all of its private VoIP solution customers via US Mail or UPS on July 25, 2005. The mailing included a customer letter, a customer acknowledgement form, a self-addressed return envelope and 911 warning labels that were to be distributed to the customers' employees.
- On July 27, 2005 Onvoy sent to all its employees using Bandwagon an e-mail that included a customer notification letter and customer acknowledgement form. On August 8, 2005 all employees using Bandwagon received a customized 911 warning label for Bandwagon service.
- In conjunction with the letter, Onvoy made available on its website information concerning Onvoy's 911 capabilities and limitations, a list of locations where Onvoy provides local phone service, information for network administrators, and links for ordering more 911 warning labels. This link, www.onvoy.com/911, became effective July 22, 2005.

- Onvoy began receiving signed acknowledgement forms via US Mail on July 27, 2005.
- On August 5, 2005, Onvoy's Customer Care Service Representatives began contacting by phone those enterprise customers who had not responded to the initial letter.
- During the week of August 8-12, Onvoy will continue to contact by phone those enterprise customers who have not responded. All phone calls to enterprise customers will warn them that unless they sign the customer acknowledgement form by August 29, 2005, the service will be disconnected on August 30, 2005, per the FCC's Public Notice, released July 26.
- Customers that have not returned a signed acknowledgement form by August 12, 2005, will receive personal calls during the week of August 15-19, 2005. Onvoy's sales force and sales engineers will personally place calls to enterprise customers to try and obtain a signed customer acknowledgement form. Onvoy will fax customer acknowledgement forms to customers, if necessary, and will accept signed forms faxed back to Onvoy.

Statistics on number of subscriber acknowledgements as of the date of this report:

% of private VoIP solution subscribers who have signed customer acknowledgement as of 8/9/05	Estimated % of signed customer acknowledgements by 8/29/05
56%	100%

% of Bandwagon subscribers who have signed customer acknowledgements as of 8/9/05	Estimated % of signed customer acknowledgements by 8/29/05
95%	100%

Onvoy's detailed description of whether and how it has distributed to all subscribers warning stickers or labels near their IP phones:

As noted above, in Onvoy's mailing to its enterprise customers on July 25, the customers received warning labels. Onvoy requested that the customers place the warning labels near the end users' IP phones. Upon request, Onvoy will mail to any enterprise customer

additional 911 warning labels. Customers can also send an e-mail requesting additional 911 warning labels through: www.onvoy.com/911.

All of Onvoy's employees who use Bandwagon service received a 911 warning label on August 8, 2005, by personal delivery.

Onvoy's quantification of how many subscribers did not receive the customer advisory or 911 warning label:

Onvoy believes that 100% of its current customers and employees received the customer advisory, the acknowledgment form and 911 warning labels.

Onvoy's detailed description of any and all actions taken towards those subscribers who have not signed an acknowledgement form:

Onvoy has detailed above the actions it will take to gain 100% compliance with signed customer acknowledgement forms. Onvoy expects to achieve 100 percent compliance by 8/29/05.

Onvoy's plan to maintain signed acknowledgments from customers:

Onvoy is collecting and storing signed customer acknowledgment forms in Onvoy's Law and Policy Department. These files will be kept for up to two years after a customer terminates Onvoy's service.

Contact information for Onvoy concerning compliance with the FCC's VoIP E911 Order:

The contact person for Onvoy responsible for compliance with the FCC's VoIP E911 Order is:

Mary T. Buley
Senior Regulatory and Interconnection Manager
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