

August 10, 2005

Federal Communications Commission
445, 12th St., S.W.
Washington, D.C., 20554
USA

SUBJECT: WC Docket No. 05-196, “Subscriber Notification Report”

Background:

Telephone Inc. (“Telephone”) is a Voice-over-Internet-Protocol services company based in Montreal, Canada, providing E-9-1-1 services to its US customers and wishes to provide to the FCC its Subscriber Notification Report as mandated in Public Notice #DA 05-2085.

Actions taken to specifically advise every subscriber

Telephone has done the following to advise every subscriber of our implementation and the limitations of our 9-1-1 services:

- A link to our 9-1-1 services description and limitations page, prominently displayed (in bold) on our “NEWS” section of our website portal, where subscribers must go to log in to their account and view important information about the use of their service. This information was posted on June 23, 2005. This text is found in Schedule “A”
- An e-mail sent to all subscribers with the same information to ensure that they have personally received it, sent July 26, 2005. (please refer to Schedule “A”)
- A repeat of the same e-mail was sent on August 10, 2005 with the addition of the requirement for acknowledgement of receipt and understanding of limitations through a reply-to e-mail that must be sent by August 29th, 2005. An example of this additional text is found in Schedule “B”.
- A letter, with a copy of the text found in Schedule “B”, along with the original text found in Schedule “A” will be mailed, via US Postal Service regular mail to their address on file.

Quantification of % of subscribers have submitted affirmative acknowledgment

As per the date of this report, we have received 0% of affirmative acknowledgment. We anticipate, however, that we should receive at least 90% acknowledgment from subscribers by the August 29th, 2005.

Description and distribution method of warning sticker.

Stickers warning of the limitations of 9-1-1 services are being sent (mailed on date of this report) to all US customers with specific instructions on placing them directly on the Telephone devices. A sample of this sticker is found in schedule “C”.

All new item shipments will include this sticker directly on the device.

Quantification of number of subscribers not receiving this information

Teliphone has sent the above notices and stickers to 100% of its US customers..

Actions to be taken towards non affirmative acknowledging subscribers

Teliphone will perform the following on August 29th, 2005 with regards to non-affirmative acknowledging subscribers:

- Immediate suspension and redirection of all outbound calls from non-affirming subscribers to our Customer Service Department where our representatives will once again get a valid e-mail address and provide an opportunity for acknowledgement and resumption of service.
- This action effectively disconnects service from the subscriber, who immediately receives notification of service disruption.
- ***While all outbound calls are re-directed to our Customer Service Department, our system still allows 9-1-1 calling (9-1-1 is the only number which bypasses our Customer Service Department and will forward the call directly to our PSAP, even if the account is suspended).***

Maintenance of Acknowledgement of Receipt Notification

Upon receipt of acknowledgement, a copy of the e-mail is printed and filed within Teliphone's corporate and administrative files. An electronic copy is then kept on Teliphone's office network servers that are backed-up on a regular basis.

Contact Information for compliance efforts with the VoIP E999 Order

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Schedule “A”

TeliPhone introduces CRTC & FCC compliant E-911

The Canadian Radio-Television and Telecommunications Commission (CRTC) and Federal Communications Commission (FCC- USA) has mandated Voice-over-Internet-Protocol companies such as TeliPhone Inc. to provide Enhanced 9-1-1 solutions to its customers. As a result, TeliPhone will now be providing these services to their clients in order to maintain its compliance with Federal regulations.

How does this impact you, the TeliPhone subscriber?

In the unfortunate case that you must dial 9-1-1 from your TeliPhone or TeliPhoneLine due to an emergency,

- Your call will be automatically directed to an emergency call center, specialized in emergency services for VoIP customers
- They will answer the phone in your preferred language, as you have identified in your TeliPhone back-office
- They will see the address you have listed at TeliPhone under “address for 9-1-1 purposes” in your TeliPhone back-office – (By default, this will be your “Billing Address”)
- They will ask for you to confirm the address where you are currently located
- They will route the call to the closest 9-1-1 center to your actual location
- You will receive assistance from this 9-1-1 center that is best suited to help you with “Police, Fire or Ambulance”

This service will be available throughout Canada & the United States

As a result, an additional \$0.50 per month will be charged to your account to help defray the costs of this service. (The charge will be seen in your monthly services on your Single Point of Contact charges, \$5.50 instead of the current \$5.00 per month).

Provisions for Emergency “9-1-1” Services

Both the Canadian Radio and Television Commission (CRTC - Canada) and the Federal Communications Commission (FCC-USA) have mandated that TeliPhone Inc. (the “Company”) must provide an Emergency “9-1-1” service for its Customers. This means that when the Customer dials 9-1-1 on their TeliPhone device, the call is immediately routed to an approved Primary Service Access Point (PSAP) where the caller will be asked to confirm whether their present location is that of their registered address with the Company, if not, to assist the PSAP agent in identifying their location (“The Process”). Once the location has been identified, the PSAP will forward the call to the nearest approved Municipal 9-1-1 emergency center.

The Company provides this service to its Customers on a best effort basis as mandated by the CRTC

and FCC. The Company in no way assumes any liability during the Process should the process fail to properly function. The Company in no way assumes responsibility for the Process, as it may be impeded by things such as but not limited to: a location of the caller that is outside of available 9-1-1 services; the PSAP service that the Company has contracted with is not operational at the time the caller requires 91-1- services; the internet connection used by the caller happens to be down during the time that the caller requires 9-1-1 services, or the Company's services are down during the time that the caller requires 9-1-1 services.

Attention new subscribers: There is a **delay of 7 days** upon creation of your new account for our 911 call center to have your location details.

June 23, 2005

Schedule “B”

Dear valued Telephone subscriber,

The Federal Communications Commission (FCC) mandates that all of our US customers reply to this e-mail to demonstrate acknowledgement and understanding of the limitations of 9-1-1 Emergency Services available to you from your Telephone Internet Phone Service. (Please see full description of these limitations below)

Please ensure to reply to this message with the following cut and paste into your message:

“I HAVE READ AND UNDERSTOOD THE CIRCUMSTANCES UNDER WHICH 9-1-1 EMERGENCY SERVICES MAY OR MAY NOT BE AVAILABLE THROUGH MY TELIPHONE INTERNET PHONE SERVICE.”

We require this reply from you no later than August 30, 2005.

If you have any questions concerning the information provided, please do not hesitate to contact our customer service dept at:

514-313-6000 (from your Telephone) or
1-877-TELIPHONE (1-877-835-4746)

Schedule "C"

911

This device has **limited** 911 capability.
For details, please visit www.teliphone.ca/911