Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
E911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196
	)	DA 05-2085
	)	

CABLEVISION SYSTEMS CORPORATION
SUBSCRIBER NOTIFICATION AND ACKNOWLEDGEMENT
STATUS AND COMPLIANCE REPORT

Cablevision Systems Corporation ("Cablevision"), by its attorneys, submits this Subscriber Notification and Acknowledgement Status and Compliance Report ("Report") in accordance with the Public Notice issued by the Enforcement Bureau of the Federal Communications Commission ("Commission") on July 26, 2005 in the above-referenced docket.[1/]

Through the marketing and communications associated with Cablevision's "Optimum Voice" voice-over-cable service, Cablevision consistently works to ensure that its customers understand how their E911 service works and what differences exist in comparison to alternative services. This Report outlines Cablevision's activities in furtherance of the rules and objectives set forth in the Commission's *VoIP E911 Order*[2/] and the Public Notice. The *VoIP E911 Order* sets forth four general requirements for the implementation of Enhanced 911 services for "interconnected VoIP" service providers. Cablevision's provision of "Optimum Voice," its

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[1/] *Enforcement Bureau Provides Guidance to Interconnected Voice over Internet Protocol Service Providers Concerning the July 29, 2005 Subscriber Notification Deadlines*, Public Notice, DA 05-2085 (rel. July 26, 2005) ("Public Notice").

[2/] *IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, 20 FCC Rcd 10245 (2005) ("*VoIP E911 Order*").

voice-over-cable service, meets each of these criteria and is compliant with the FCC's *VoIP E911 Order*.

First, the *VoIP E911 Order* requires each interconnected VoIP provider to provide E911 service that transmits all 911 calls and ANI/ALI information to the appropriate, geographically relevant public safety answering point ("PSAP").

Cablevision has delivered the complete functionality of Enhanced 911 as a key feature of Optimum Voice since its implementation. Optimum Voice's E911 service is a hard-wired, full implementation of the E911 standard. Cablevision has met consumer expectations for E911 implementation, and believes that this is an important component of the success of Optimum Voice service. All telephone numbers have geographical relevance, are mapped to the appropriate PSAP, and ANI/ALI information is verified and populated for a specific customer service location. In this regard, Cablevision's E911 implementation is fully compliant with the requirements of this portion of the *VoIP E911 Order*.

Second, the *VoIP E911 Order* requires each customer to have a means to provide their physical location and to advise the service provider of changes to that service location.

Optimum Voice is not marketed for mobility. Numbers are assigned based on call centers, and E911 implementation is keyed to the customers' service address. The service is not engineered to work at other locations and the terms of the customers' agreement prohibits attempts to use the product outside of the designated service location. Each customer must provide the service address as a condition of obtaining service. Service addresses are rigorously checked through the industry Master Street Address Guide ("MSAG") as well as against the company's own customer and residential service records. This double test helps identify any errors in the transcription of a service address to minimize the risk of a false positive ANI/ALI

indication in the event of a 911 call. Customers can change their service address by calling customer support and requesting such a change.

Third, the *VoIP E911 Order* requires each customer to be notified of and acknowledge any limitations of the E911 service to the extent that the VoIP service "is in some way limited by comparison to traditional E911."

As noted above, Cablevision's Optimum Voice has delivered the full functionality of E911 service. Because of the nature of E911 service, its implementation differs in some ways from some other E911 implementations. While these differences are minor and in most cases are no different from customers' current expectations for landline E911 (*e.g.*, powering issues for cordless phones and network issues), Cablevision has identified these limitations to its customers.

For example, every Optimum Voice customer receives a handbook that explains E911 service as follows (relevant pages from the handbook are attached):

> Enhanced 911 Service: Enhanced 911 Service (E911) will not operate in the event that the modem loses power. Your E911 service will only operate properly if your modem remains at the service address specified on your Cablevision account. You must contact Cablevision Customer Service if you plan on moving the modem to a different address. If your Optimum Voice service is disconnected for any reason, E911 service will also be disconnected.
>
> Modem Power: Your Optimum Voice modem is electrically powered and does not include battery backup power. In the event of a power outage, the modem and all phones connected to it will not function.

In addition, every Optimum Voice customer receives an "Important Information" card (attached), written in both Spanish and English, stating the functionality of Optimum Voice E911. This stand-alone information card is a prominent part of the customer introductory package. These messages also are prominently featured on the Terms and Conditions section of

the Optimum Voice website, www.optimumvoice.com. In its e-newsletter and direct marketing efforts, Cablevision includes additional E911 information, and Cablevision offers its customers the option of purchasing a battery back-up unit. This battery back-up unit is available to Optimum Voice customers online at: www.optimumvoice.com/battery.

Further, it is the business practice of Cablevision to provide the handbook and Important Information card to each Optimum Voice customer at the time of installation and to obtain a written acknowledgement that the customer has received the handbook about the product, including the Important Information card. The policy of the company is to obtain written acknowledgements from every customer. The acknowledgement is executed at the completion of work and provides, in part:

> I have received a customer handbook and privacy notification from Cablevision's installer.
>
> [s/s]

Cablevision maintains records of its customers' acknowledgements pursuant to its standard document retention policies. Cablevision's customer service practice is to require each customer to read and sign the acknowledgement on the work order, and analysis of these records demonstrates that the company can verify more than 98 percent of its customers' written acknowledgements.

To ensure that all of Cablevision's Optimum Voice customers maintain their understanding of the E911 implementation of Optimum Voice, Cablevision is launching the following additional initiatives to reinforce Cablevision's customers' understanding of E911:

- Effective August 1, Cablevision deployed a revised Enhanced Home Wiring Agreement (attached). This document is a supplement to the acknowledgement in the work order and provides a more specific explanation of the company's E911 policies.

Every customer must initial an acknowledgement of the policy on the document. It says:

> Enhanced 911 Service (E911): Your E911 service will not operate if there is a power outage in your home*, unless you have a battery back-up on your modem, or if you move your cable modem to a new address without notifying Cablevision. If you wish to move your cable modem to another address, you must contact Cablevision Customer Service to ensure that E911 service will continue to work properly. Obviously, if your service is disconnected by Cablevision, or if the service to your home is interrupted, you will not have access to E911.
>
> Please initial:
>
> (_____) I acknowledge that I've read and understand the limitations regarding Optimum Voice E911 service as outlined above.
>
> **If you would like to purchase battery standby power for your modem, please visit us at www.optimumvoice.com/battery.*

- In addition, Cablevision has modified its work order to more closely track the language suggested in the Commission's *VoIP E911 Order*. The new work order will specifically set forth the company's E911 policy and will require a specific acknowledgement in a manner similar to that required on the Enhanced Home Wiring Agreement.

Fourth, the *VoIP E911 Order* requires each customer to be provided additional notice and warning stickers that they may be instructed to attach to his or her VoIP equipment.

Cablevision has completed the mailing of a first class notification to every Optimum Voice subscriber with the reminder message that reinforces the implementation of Cablevision's E911 service. Also included in that notification is an adhesive sticker that customers will be instructed to put on their cable modem, reminding them of the associated limitations of E911.

In accordance with the Public Notice, Cablevision's primary contact in connection with this matter is:

Michael E. Olsen
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Respectfully submitted,

CABLEVISION SYSTEMS CORPORATION

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Dated: August 10, 2005

ATTACHMENTS

Optimum online SM

Optimum voice SM

quick-start guide

Optimum SM

VERSION 3.0

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IMPORTANT INFORMATION

Modem Power

- Your Optimum Voice modem is electrically powered and does not include battery backup power.
- In the event of a power outage, the modem and all phones connected to it will not function.

Enhanced 911 Service

- Enhanced 911 Service (E911) will not operate in the event that the modem loses power.
- Your E911 service will only operate properly if your modem remains at the service address specified on your Cablevision account. You must contact Cablevision Customer Service if you plan on moving the modem to a different address.
- If your Optimum Voice service is disconnected for any reason, E911 service will also be disconnected.

Home Security and Medical Alert Systems

- Cablevision does not support the use of Optimum Voice as the connection between the customer's home security system or emergency medical alert system and central station monitoring services, and will neither connect to such services nor provide technical support for the connection.

Optimum Voice is for residential use only. Complete Terms and Conditions can be found on **www.optimumvoice.com**

IMPORTANT INFORMATION

Modem Power:

- Your Optimum Voice modem is electrically powered and does not include battery back-up power.
- In the event of a power outage, the modem and all phones connected to it will not function.

Enhanced 911 Service:

- Enhanced 911 Service (E911) will not operate in the event the modem loses power.
- Your E911 service will only operate properly if your modem remains at the service address specified on your Cablevision account. You must contact Cablevision Customer Service if you plan on moving the modem to a different address.
- If your Optimum Voice service is disconnected for any reason, E911 service will also be disconnected.

Home Security and Medical Alert Systems:

- Cablevision does not support the use of Optimum Voice with emergency medical alert systems.
- Customers using Optimum Voice as a connection between their home security system and central station monitoring are responsible for testing their system with their alarm company at the time of installation and on an ongoing basis, and also must notify their alarm company of any change in their telephone number.

For further details, please log on to www.optimumvoice.com/support or dial 611 on your Optimum Voice phone.

Optimum voice

INFORMACION IMPORTANTE

Alimentación del Módem:

- Su módem Optimum Voice es alimentado por corriente eléctrica normal y no incluye un paquete de batería auxiliar en caso de que falle la energía eléctrica.
- En caso de que falle la energía eléctrica, el módem y todos los teléfonos que estén conectados a él no funcionarán.

Servicio Enhanced 911:

- El servicio Enhanced 911 (911) no funcionará en caso de que el módem deje de recibir energía eléctrica.
- Su servicio E911 funcionará apropiadamente sólo si su módem es mantenido en la dirección especificada en su cuenta de Cablevision. Debe contactar al departamento de Servicio al Cliente de Cablevision si tiene planeado mudar el módem a otra dirección.
- Si su servicio de Optimum Voice es desconectado por cualquier razón, el servicio E911 también será desconectado.

Sistemas de seguridad del hogar y alerta médica:

- Cablevision no ofrece la capacidad de usar Optimum Voice con sistemas de alerta médica de emergencia.
- Los clientes que usen Optimum Voice como conexión entre el sistema de seguridad de su vivienda y los servicios de vigilancia desde una estación central son responsables de probar su sistema con su compañía de alarma en el momento de la instalación y de modo continuo, y también deben notificar a su compañía de alarma todo cambio en su número de teléfono.

Para más detalles por favor conéctese a www.optimumvoice.com/support o marque 611 en su teléfono Optimum Voice.

Optimum voice

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CABLEVISION

Important Information About Your **Optimum Voice® Service**

In compliance with a recent FCC ruling, we need to ensure all of our Optimum Voice customers have a clear understanding of E911 service. In the event of a power outage in your home, and providing you do not have a battery back-up on your modem, you will not have access to E911 service.

Additionally, if you relocate the modem to a different address, you must notify Cablevision in advance to ensure that E911 service will work properly. Obviously, if your service is disconnected by Cablevision, or if the service to your home is interrupted, you will not have access to E911.

If you have questions, please contact us at 1-888-310-8747, Monday - Friday from 9am-5pm.

The attached sticker is being provided to you as a reminder.

PLEASE AFFIX THE ATTACHED STICKER TO YOUR MODEM.

Your E911 service will not operate if:

- There is a power outage in your home, unless you have a battery back-up connected to your modem.
- Your service is disconnected by Cablevision.
- Service to your home is interrupted.
- You move your cable modem to a new address without notifying Cablevision.

To move your cable modem to another address, you must contact Cablevision Customer Service prior to your move to ensure that E911 will continue to work properly.

E911 and Enhanced Home Wiring Information Agreement

IMPORTANT INFORMATION ABOUT E911 AND WIRING YOUR OPTIMUM VOICE℠ SERVICE TO YOUR HOME SECURITY SYSTEM

Welcome to the Optimum Voice family!

We welcome the opportunity to install our Optimum Voice service in your home today and wish to share some important information with you about our Enhanced 911 Service (E911) and enhanced home wiring solution.

Enhanced 911 Service (E911)

Your E911 service will not operate if there is a power outage in your home[1], unless you have a battery back-up on your modem, or if you move your cable modem to a new address without notifying Cablevision. If you wish to move your cable modem to another address, you must contact Cablevision Customer Service to ensure that E911 service will continue to work properly. Obviously, if your service is disconnected by Cablevision, or if the service to your home is interrupted, you will not have access to E911.

Please initial:

[___] I acknowledge that I've read and understand the limitations regarding Optimum Voice E911 service as outlined above.

Enhanced Home Wiring Solution

Your Optimum Voice service has been installed so that it's available for use with your centrally monitored security system.

First, a few helpful steps:

You should check that your home security system is in working order. While the technician installing the service is at your home today, you should call your alarm company and test the system. Second, after the technician has completed the Optimum Voice installation, you should call your home security company to conduct a post-installation check. This is also a good opportunity to provide your home security provider with your new Optimum Voice phone number. We will then ask you to sign below to verify that such tests have been completed and that the home security system is operational.

Although we will provide a wire connection so that Optimum Voice is available for use with your existing home security system, it is your responsibility to follow-up with your alarm company to confirm that they have your correct and current phone number and to perform any periodic operational tests that your central station monitoring provider might recommend. You further understand that in the event of a power outage or network outage your Optimum Voice service will not be available to contact your central station monitoring provider.[1]

Cablevision does not support the use of Optimum Voice as the sole connection between a customer's emergency medical alert system and central station monitoring, and will neither connect to such systems nor provide technical support. If you have such a system, we recommend that you secure an alternate, redundant telephone connection.

I acknowledge receipt of this notice setting forth the limitations of the Optimum Voice service and I have signed below to confirm that I have been given the opportunity to complete a pre and post-installation test of my home security system with Cablevision's technician present.

Please initial:

[___] I acknowledge that I have contacted my central station monitoring provider to test my home security system. I verified that it is in good working order. I agree to follow-up with my central station monitoring provider to update my records and for further testing, if necessary.

[___] I acknowledge that I was given the opportunity to contact my central station monitoring provider to test my home security system but chose not to at the time of installation. I agree that confirming the good working order of my home security system is my responsibility. I understand that I am responsible for any additional work required to ensure the proper operation of my home security system.

_____ _____

Authorized Customer Signature Date

OFFICIAL USE ONLY Corp [_____] Account [_____] -- [_____]

[___] Customer declined signature.

[1] If you would like to purchase battery standby power for your modem, please visit us at www.optimumvoice.com/battery.