



August 25, 2005

**Via Electronic Filing**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW-B204  
Washington, D.C. 20554

**Re: *In the Matter of IP-Enabled Services, WC Docket No. 04-36, and E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196***

Dear Ms. Dortch:

Pursuant to the Commission's recent *VoIP E911 Order*<sup>1</sup> and *Public Notice*<sup>2</sup> in the above-referenced dockets, MCI filed its Subscriber Notification Report on August 10, 2005. In addition, MCI filed an *ex parte* letter on August 18, 2005, in which MCI expressed support for CompTel's petition for reconsideration, clarification, or waiver, and suggested, among other things, that the Enforcement Bureau should continue not to seek enforcement of the customer notification and acknowledgement requirements of the *VoIP E911 Order* with respect to the customers implicated by the CompTel petition, until the CompTel petition is resolved.

We have since learned new information relevant to those filings, and we are submitting this letter to update the record accordingly. Specifically, MCI is now able to disable a MCI Advantage customer's VoIP service without taking down the customer's data system and other IP-enabled services. Furthermore, the interval for restoring those VoIP services would likely be less than one business day.

While MCI is working to minimize disruption to customers if MCI is forced to disconnect VoIP service, customers will still be exposed to potential significant interruption of business outside of MCI's control during the time they are out of service. Such a result – in which customers who currently have E-911 service and have been notified of the limitations associated with access to 911 emergency services are left without any service and, therefore, no means to contact emergency services – is not in the public interest.

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<sup>1</sup> Established in *IP-Enabled Services and E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, FCC 05-116 (rel. June 3, 2005) (*VoIP E911 Order*).

<sup>2</sup> Public Notice, WC Docket Nos. 04-36, 05-196, DA 05-2085 (rel. July 26, 2005).

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Pursuant to the Commission's Rules, this *ex parte* notice is being filed through the Commission's Electronic Comment Filing System procedures. Please do not hesitate to contact me should you have any questions regarding this filing.

Respectfully submitted,

Amy Wolverton

cc: Christi Shewman, Elizabeth Mumaw, Marcey Greene, David L. Hunt, Kathryn S. Berthot, Berry Best Copy and Printing