

# COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE NW  
WASHINGTON, DC 20004-2401  
TEL 202.662.8000  
FAX 202.652.8281  
WWW.COV.COM

WASHINGTON  
NEW YORK  
SAN FRANCISCO  
LONDON  
BRUSSELS

Sept. 1, 2005

## VIA ELECTRONIC FILING

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

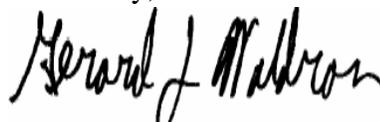
Re: WC Docket Nos. 04-36 and 05-196

Dear Ms. Dortch:

On behalf of Global Village, attached please find the Second Subscriber Notification Report of Global Village. In accordance with the Enforcement Bureau's Public Notice of Aug. 26, 2005,<sup>1</sup> this Second Notification Report is being filed to update Global Village's First Subscriber Notification Report filed in August.

Please direct any questions to the undersigned.

Sincerely,



Gerard J. Waldron  
Matthew S. DelNero  
*Counsel to Global Village*

cc: Kathy Berthot, Spectrum Enforcement Division, Enforcement Bureau  
Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau  
Janice Myles, Competition Policy Division, Wireline Competition Bureau

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<sup>1</sup> *Enforcement Bureau Provides Further Guidance to Interconnected Voice Over Internet Protocol Service Providers Concerning Enforcement of Subscriber Acknowledgement Requirement*, Public Notice, DA 05-2358 (rel. Aug. 26, 2005).

## Second Subscriber Notification Report of Global Village

WC Docket Nos. 04-36, 05-196

Pursuant to instruction from the Enforcement Bureau,<sup>1</sup> following is the Second Subscriber Notification Report concerning the compliance of Global Village, a provider of interconnected Voice over Internet Protocol (“VoIP”) service, with 47 C.F.R. § 9.5(e).

### **Notifications to Subscribers :**

As described in Global Village’s First Subscriber Notification Report, filed in August 2005, all U.S. customers have been provided notification of the circumstances under which E911 service may not be available through the Global Village interconnected VoIP service or may be in some way limited by comparison to traditional E911 service. As also noted in the First Subscriber Notification Report, warning stickers reflecting this notification with instructions to place such stickers on or near the customer’s Zoom (VoIP) hardware were mailed to all U.S. customers.

### **Receipt of Affirmative Acknowledgements :**

To date, Global Village has received affirmative acknowledgement from 69% of its U.S. customers that they have received and understood the above-described notification. Global Village has no reason to believe that less than 100% of subscribers will have provided affirmative acknowledgement by Sept. 28, 2005. Nevertheless, it is possible that some subscribers will refuse or for some other reason fail to provide affirmative acknowledgement by that date.

### **Additional Steps :**

As noted above, 31% of subscribers have not yet provided affirmative acknowledgement of having received the above-described notification. Global Village sent a second notification to these subscribers on August 23, 2005. Within the next ten days, Global Village will provide additional notification or notifications to any remaining subscribers who have not provided affirmative acknowledgement. This notification will advise these subscribers that their interconnected VoIP service will be disconnected on Sept. 28, 2005 if affirmative acknowledgement is not received by that date.

### **Disconnect Information:**

Global Village provides its customers with VoIP hardware that includes Zoom’s TelePort™ technology. A TelePort-equipped modem routes calls to the Internet as VoIP calls only when the user explicitly elects to do so. When a caller dials 911, the TelePort passes the call, with location and numbering information, to the Wireline E911 Network over the PSTN (*i.e.*, not as a VoIP call). Thus, it is not Global Village but rather the subscriber’s wireline provider that handles the customer’s 911 call. Accordingly, a “soft” or “warm” disconnect, whereby Global Village

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<sup>1</sup> See *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).

would disallow interconnected VoIP non-911 calls but ensure that VoIP 911 calls are directed to the appropriate PSAP, is not applicable.

Global Village anticipates that customers disconnected from its interconnected VoIP service will be enrolled in a non-interconnected VoIP service; such customers will be provided prominent notification that they are no longer receiving Global Village's interconnected VoIP service and that their ability to place 911 calls still depends on use of the TelePort-equipped hardware and connection to dial tone service.