

**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
)	

MCI SUBSCRIBER ACKNOWLEDGEMENT REPORT, SEPTEMBER 1, 2005

MCI Inc., (“MCI”) submits this Subscriber Acknowledgement Report, containing updated information related to MCI’s progress in obtain affirmative acknowledgments from its customers consistent with the requirements of the *VoIP E911 Order*.¹

The Enforcement Bureau has indicated that “it will not initiate enforcement action, until September 28, 2005, regarding the affirmative acknowledgement requirement against [interconnected VoIP service] providers that: (1) previously filed reports on or before August 10, 2005 in accordance with the July 26 Public Notice; and (2) file two separate updated reports with the FCC by September 1, 2005 and September 22, 2005, containing the information described below.”² As in its August 10, 2005 *Subscriber Notification Report*, MCI provides the requested information separately for MCI Advantage and for Neighborhood Broadband Calling.

¹ *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*).

² Public Notice, WC Docket Nos. 04-36, 05-196, DA 05-2358 (rel. Aug. 26, 2005)(*August 26 Public Notice or Notice*).

- 1) A detailed explanation regarding current compliance with the notice and warning sticker requirements *if* the provider did not notify and issue warning stickers or labels to 100% of its subscribers by the July 29, 2005 deadline. Providers expected to update this information include those that were in the process of providing notice and/or stickers to their subscribers, but had not completed the process by July 29, 2005.**

MCI Advantage

Not applicable: MCI notified and issued warning stickers or labels to 100% of its Advantage subscribers by the July 29, 2005 deadline.

Neighborhood Broadband Calling

Not applicable: MCI notified and issued warning stickers or labels to 100% of its Neighborhood Broadband Calling subscribers by the July 29, 2005 deadline.

- 2 A quantification of the percentage of the provider's subscribers that have submitted affirmative acknowledgements as of September 1 and September 22 reports, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by September 28, 2005.**

MCI Advantage

Ninety-six percent of existing MCI Advantage customers have submitted an affirmative acknowledgment as of August 31, 2005. MCI is making a concerted effort to contact and obtain affirmative acknowledgments from its remaining customers, and MCI expects to receive acknowledgments from nearly all of them.

Neighborhood Broadband Calling

Forty-nine percent of existing MCI Neighborhood Broadband Calling customers have submitted an affirmative acknowledgment as of August 31, 2005. MCI is making a

concerted effort to contact and obtain affirmative acknowledgments from its remaining customers, and MCI does not expect the percentage of customers who do not respond to exceed ten percent.

In its August 10, 2005 *Subscriber Notification Report* MCI provided a percentage that reflected the responses it received to its request for acknowledgement from Neighborhood Broadband Calling customers. Upon further evaluation of those responses, MCI has determined that some of those responses were insufficient for purposes of meeting the customer acknowledgement requirements and are revising the number accordingly. Therefore, twenty-seven percent of existing MCI Neighborhood Broadband Calling customers had submitted an affirmative acknowledgment as of August 8, 2005.

- 3 A detailed description of any and all actions the provider plans to take towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory.**

MCI Advantage

MCI will continue its outreach campaign to obtain affirmative acknowledgements from all of its Advantage customers. It is MCI's goal to avoid suspension or disconnection of any of its customers. MCI does intend to comply with the *VoIP E911 Order* and any associated Commission directives, however.

Neighborhood Broadband Calling

MCI will continue its outreach campaign to obtain affirmative acknowledgements from all of its Neighborhood Broadband Calling subscribers. It is MCI's goal to avoid

suspension or disconnection of any of its customers. MCI intends to comply with the *VoIP E911 Order* and any associated Commission directives, however.

- 4 **A detailed description of any and all plans to use a “soft” or “warm” disconnect (or similar) procedure for subscribers that fail to provide an affirmative acknowledgement by September 28, 2005. As the Bureau understands it, the soft disconnect procedure will either disallow all non-911 calls or intercept and send those calls to the provider’s customer service department. Under this “soft” disconnect procedure, however, calls to 911 will continue to go to the appropriate Public Safety Answering Point (PSAP). A provider’s September 1 report must include either a statement that the provider will use a “soft” or “warm” disconnect (or similar) solution as of September 28, 2005 or a detailed explanation of why it is not feasible for the provider to use a “soft” or “warm” disconnect (or similar) solution.**

MCI Advantage

MCI plans to prevent Advantage subscribers who have not provided the requisite affirmative acknowledgement by September 28, 2005, from receiving or making any calls via their Advantage service with the exception of existing 911 calls unless and until MCI receives the acknowledgement. MCI considers this solution to be similar to the “soft” or “warm” disconnect solution described by the Commission in its *August 26, 2005 Public Notice*.

Neighborhood Broadband Calling

As indicated in its August 10 *Subscriber Notification Report*, if MCI is forced to disconnect service to its Neighborhood Broadband Calling subscribers who have not provided the requisite affirmative acknowledgement by September 28, 2005, these customers will be unable to receive or make any calls via their Neighborhood Broadband Calling until MCI receives their response, with the exception of existing 911 capabilities and customer service (“611”). MCI considers this to be similar to a “soft” or “warm” disconnect solution as described by the Commission in its *August 26 Public Notice*.

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