Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of	)	
	)	
IP-Enable Services	)	WC Docket No. 04-36
	)	
E911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196
	)	

REPLY COMMENTS OF VONAGE AMERICA INC. TO PETITION FOR CLARIFICATION

Vonage America Inc. ("Vonage") submits these reply comments to respond to certain issues raised in connection with the Joint Petition for Clarification filed by the National Emergency Number Association and the Voice on the Net (VON) Coalition ("NENA/VON Petition") and the Petition of T-Mobile USA, Inc. for Clarification ("T-Mobile Petition") filed in the above captioned dockets on July 29, 2005, as well as the comments filed in response to those Petition.

At the outset, Vonage agrees that E911 service is of paramount importance and that deployment of an effective E911 service for VoIP service will provide an important public safety benefit to VoIP users which will serve the public interest. For that reason, and in order to comply with the Commission's *VoIP E911 Order,*[1] Vonage continues to work closely with competitive carriers, incumbent local exchange carriers, database operators and members of the public safety community to implement an E911 solution as rapidly as possible.

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[1] *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, FCC 05-116 (rel. June 3, 2005) (the "Order").

The NENA/VON Petition points out that the public safety community utilizes an addressing validation method called the Master Street Address Guide ("MSAG"). NENA and the VON Coalition argue that for a E9-1-1 system to work properly from end to end, any address registered by a subscriber on the system must be validated against the MSAG and that the address transmitted to the PSAP must be MSAG validated.[2] T-Mobile's Petition suggests, however, that the Order does not specifically address whether registered locations must be MSAG validated and that delivery of location data in geographic longitude and latitude (known as "x, y") format instead of MSAG validated address may be appropriate.[3] NENA and the VON Coalition disagree and ask that the Commission clarify the *Order* by specifying that MSAG address validation is required rather than civil addresses.[4]

While Vonage is making extensive efforts to deploy an E911 system within the Commission's deadlines and agrees with the importance of providing location information which is as accurate and useful as reasonably possible to emergency responders, Vonage has found that in some instances, access to necessary third-party information which is critical to the implementation of an E911 system can be difficult or impossible to obtain. VoIP providers, indeed any providers attempting to deploy nationwide E911 systems, need access to significant local information which is not generally publicly available in order to provide E911 services.

The MSAG is one such example. For obvious reasons, MSAG validation cannot occur without access to the MSAG. Yet today, no centralized or uniform system exists for VoIP providers to obtain access to or even source location for the MSAG. As a result, identification of

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2 NENA/VON Petition, at 5.

3 T-Mobile Petition, at 11.

4 *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers,* Opposition of NENA, at 1-2 (fil. Sep. 15, 2005).

the owner of the MSAG must be completed and terms for MSAG access negotiated on a jurisdiction by jurisdiction basis without uniform, consistent or transparent procedures or processes.[5]

Vonage supports MSAG access and submits that the Commission should undertake efforts to ensure e the universally availability of MSAGs on non-discriminatory terms to any provider, ILEC, CLEC, VoIP, or other new technology, that is deploying an E911 system. Collection of information such as the MSAG in a clearinghouse format would also allow VoIP providers and, indeed other providers, one stop rapid access to the information they require to expeditiously design and deploy their E911 systems. MSAG access would permit VoIP providers to accurately and easily locate the source of needed information and quickly and effectively design and implement their respective emergency solutions. Such information would also serve as a valuable resource for PSAPs who can quickly and easily find information about the operations of other public safety organizations. In order to ensure that MSAG validation occurs, the Commission should clarify that those in the possession of the MSAG may not withhold or unreasonably preclude access to validation data.

Vonage agrees that the provision of usable location information is an important function and remains interested in MSAG validation. At the same time, as a practical matter, deployment of MSAG validation is hampered by the lack of easy availability of the MSAG. Vonage submits that meeting the goal of nationwide E911 deployment may not be possible unless the inputs

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[5] Moreover, processes for obtaining other important inputs are similarly undefined. For example, no publicly available list of selective routers or PSAPs exist. In addition, in some areas, no process for the assignment of numbering (pANI) resources exists. Vonage recognizes that the process for creating an Interim 9-1-1 Routing Number Authority ("Interim RNA") is underway and Vonage has been closely involved in those efforts. That process is not yet complete, however Vonage believes that an effective information clearinghouse could address all of these issues simultaneously.

necessary for deployment are universally available on a non-discriminatory basis. Vonage therefore supports the recommendations of those that advocate that the Commission should ensure non-discriminatory access to the MSAG and take the further steps to create an information resource which will allow VoIP providers one stop, non-discriminatory access to MSAG along with any other system inputs (such as selective router information, PSAP location information, etc.). As Vonage has previously stated, open systems will ultimately facilitate the expedited deployment of new E911 systems.[6]

Respectfully submitted,

/s/

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[6] *See E911 Requirements for IP-Enabled Service Providers,* Comments of Vonage America, Inc. at 2-7 (fil. Aug. 15, 2005).