



September 27, 2005

VIA ELECTRONIC FILING

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

Re: *Ex Parte* Presentation, *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 a request from Staff, MCI is providing this update on MCI's existing VoIP E-911 capabilities and its plan to comply with the November 28 deadline established by the Commission's *VoIP E911 Order*.¹

At the outset, MCI takes this opportunity to express again its full support for the Commission's objective to provide consumers with vital public safety services like E-911 when using emerging technology services such as VoIP. MCI has complied with and will continue to comply with all of the Commission's orders and public notice requirements in this proceeding.

MCI, through its operating subsidiaries, currently provides two services to end users that meet the definition of "interconnected VoIP service" set forth in the *VoIP E911 Order* and therefore are subject to the order's requirements: MCI Advantage and Neighborhood Broadband Calling. MCI Advantage is sold to business customers, and Neighborhood Broadband Calling is sold to mass market customers.

In fact, MCI has supported E-911 service as a standard feature of its fixed-location two-way local access VoIP products from the date of product launch. All existing fixed profile MCI Advantage customers, and all existing Neighborhood Broadband Calling customers, have E-911 capability at their primary location. Since the inception of both products, MCI has provided E-911 for the customer's primary location as a standard service, not an optional feature. MCI's products are designed to deliver all 911 calls from fixed-location subscribers to the appropriate PSAP, along with a valid call back number and associated service address.

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*).

MCI only sells its fixed-profile MCI Advantage service in areas where it has E-911 availability, and MCI provides E-911 capability to 100 percent of its fixed-profile MCI Advantage customers for their primary location.

Currently, MCI has VoIP E-911 capability for its MCI Advantage fixed-profile customers at their primary location via its own network facilities in areas serving 55 percent of the United States population. In addition, MCI will be partnering with Intrado in order to expand its MCI Advantage VoIP E-911 coverage area. This will eventually allow MCI to provide E-911 capability for customers who have registered a new location with MCI in certain areas in which MCI would not otherwise have VoIP E-911 coverage.

The Intrado partnership will increase MCI's VoIP E-911 capable area to 62 percent of the United States population by November 28, 2005. Additionally, MCI is continuously working to expand its coverage area, both via its own network facilities and through additional Intrado coverage.

For Neighborhood Broadband Calling, MCI also sells its service only in areas where it has E-911 capability. MCI therefore has VoIP E-911 capability for 100 percent of its customers at their primary location.

MCI currently has VoIP E-911 capability for Neighborhood Broadband Calling in areas serving 54 percent of the United States population. MCI expects to be able to provide VoIP E-911 capability for Neighborhood Broadband Calling in areas serving 72 percent of the United States population by November 28, 2005. MCI is providing its Neighborhood Broadband Calling service via a resale arrangement with a third-party vendor.

Development is underway to ensure that MCI Advantage customers and Neighborhood Broadband Calling customers are provided with E-911 capability in a manner consistent with the *VoIP E911 Order* in all areas where use of their service is authorized, provided that the customers notify MCI if and when they change their location.

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,



Curtis L. Groves