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October 21, 2005

VIA ELECTRONIC FILING

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

Re: Ex Parte Presentation, IP-Enabled Services, WC Docket No. 04-36; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

MCI takes this opportunity to provide a further update to the Commission on MCI's VoIP 911 capabilities and its plans to ensure that it continues to provide its Neighborhood Broadband Calling mass market trial offering¹ and its MCI Advantage service for business customers² in full compliance with the Commission's 911 rules³ adopted earlier this year.⁴

We are pleased to report that MCI has plans in place to implement by November 28 new software-based automatic detection processes that will be capable of detecting

¹ Neighborhood Broadband Calling is a digital voice service for mass market customers that enables subscribers to make calls to and receive calls from the PSTN, as well as from IP-connected telephones, over the Internet via the customer's existing Digital Subscriber Line or cable broadband connection. MCI launched Neighborhood Broadband Calling on a limited, trial basis in June 2005.

² MCI Advantage is a portfolio of IP convergence services with different configurations that consolidates business customers' voice and data applications over a single data network. It enables end users to make calls to and receive calls from the PSTN, as well as from IP-connected telephones, over the Internet through the corporate customer's existing local access network ("LAN"). MCI Advantage is available in the United States and internationally. This letter addresses MCI's compliance efforts for its domestic customers.

³ See *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 911 Order*); Public Notice (DA 05-2530), released September 27, 2005. See also Public Notice (DA 05-2085), released July 26, 2005; Public Notice (DA 05-2358), released August 26, 2005.

⁴ The commitments contained in this letter apply to any other interconnected VoIP service that MCI may offer in the future.

when a subscriber has disconnected and reconnected his IP-enabled customer premises equipment.⁵ Such detection capabilities will indicate to MCI that the subscriber may have attempted to move his service from its Registered Location. In that case, MCI will take steps to suspend the subscriber unless and until he verifies that he is at his Registered Location, or until MCI has processed a requested address change to a location at which MCI can provide that specific subscriber with 911 service.

As we have stated previously, MCI strongly supports the Commission's goal of ensuring that the benefits of 911 capabilities are available to all customers of interconnected VoIP services.⁶ It is important to note that all of MCI's interconnected VoIP subscribers already have 911 capability at their fixed, primary location and that MCI will not add new customers in areas where it does not have 911 capability. And, MCI will take steps to advise its interconnected VoIP customers that their service currently is a fixed service to be used only at the primary Registered Location.

Because the Neighborhood Broadband Calling trial and MCI Advantage are provisioned over different networks and use different customer premises equipment ("CPE"), MCI's specific compliance plans for each are slightly different, as we explain in the following.

1. Automatic Detection Capabilities -- Mass Market Trial (Neighborhood Broadband Calling)⁷

As a threshold matter, the Neighborhood Broadband Calling trial that MCI initiated in June 2005 is limited in scope. MCI provides service via a resale arrangement with a third-party vendor and has only a small number of current subscribers. These customers receive service through a VoIP Telephone Adapter ("TA") that connects ordinary telephones to the customer's broadband connection. And, as discussed above,

⁵ For MCI Advantage, "customers" refers to the corporate customer with whom MCI has contracted to provide service, whereas "end users" or "subscribers" refer to the individual user of the service. A corporate customer will have more than one end user. For the Neighborhood Broadband Calling trial, "customers," "end users," and "subscribers" all refer to the mass market end user and are used interchangeably.

⁶ MCI has complied, and will continue to comply, with all of the Commission's orders and directives in this proceeding. As we have reported previously, MCI has provided notice to all of its customers with respect to the limitations of the 911 capabilities that are currently available on our interconnected VoIP services. To date MCI has obtained acknowledgements from more than 90 percent of its customers and is continuing to pursue acknowledgments from those who have not yet responded.

⁷ As the Commission is aware, Verizon -- which also provides a mass market interconnected VoIP service that is provided by reselling services of a third-party vendor -- separately has proposed to acquire MCI. Pending approval of this transaction, the parties have not completed their detailed business integration planning, or determined as a business matter whether or where to continue to offer service on a resold basis, whether or where to offer a single service, whether or when to move to a network-based service, or the terms for any such services going forward.

all of these subscribers currently have complete 911 capability at their primary, Registered Location.

By November 28, MCI through its vendor will be able to detect when a customer's TA powers down and powers back up. In the event that the customer's TA loses power, the customer's account will be designated "inactive" and will be suspended. When suspended customers attempt to make an outbound call, they will hear a recorded message instructing them to dial 611 to contact MCI customer service. When the customer calls MCI, if the customer confirms that he is at his Registered Location, full service will be restored immediately. If the customer informs MCI that he is attempting to use his TA at a new location, the customer's service will remain suspended (but 911 calls will continue to be routed to the PSAP associated with the primary Registered Location) unless the customer registers a location at which MCI can provide that specific customer with 911 service.⁸

2. Automatic Detection Capabilities -- Business Service (MCI Advantage)

As with its mass markets trial, MCI provides 911 capability to all of its fixed-profile MCI Advantage subscribers at their primary, Registered Location, and has done so as a standard offering since its inception. MCI supports this capability via its own network and is interconnected with the Wireline E911 network in order to route 911 calls to the proper PSAP.

MCI Advantage offers a variety of services that employ several different types of CPE. The vast majority of MCI Advantage subscribers have CPE that does not permit use of the MCI Advantage service away from the subscriber's office. Many of these subscribers have ordinary telephones at their desks that are connected to a PBX or IP gateway. A smaller number of subscribers also have ordinary telephones that connect through multi-port IP-enabled telephone adapters, rather than to a PBX or gateway. These devices are generally housed in a "telephone closet" on the customer's premises and can connect four to twenty-four ordinary telephones to the service, allowing them to operate with the IP service. Subscribers with these configurations cannot use their MCI Advantage service anywhere except in their office.

A small percentage of MCI Advantage subscribers use SIP phones. These phones are desktop consoles, supporting one to six separate lines, with built-in IP capability. These SIP phones are normally used in the subscriber's office environment. And, as discussed above, MCI will advise its MCI Advantage customers that their service currently is a fixed service to be used only at the primary Registered Location. Nevertheless, MCI has taken steps to implement automatic detection capabilities for

⁸ MCI anticipates adding additional improvements after November 28, including changes that will minimize false positives and implementation of an easy-to-use voice prompt system as part of the recorded intercept message.

these subscribers, to provide a safeguard to ensure that the SIP phones cannot be used by an individual subscriber except in locations where MCI can provide that subscriber with 911 service.

By November 28, MCI will implement a system that detects when a SIP phone's IP address has changed. A change in the subscriber's IP address will indicate to MCI that an end user may have moved his SIP phone away from his Registered Location.

In the event that the subscriber's IP address changes, MCI will attempt to contact the subscriber.⁹ If MCI customer service successfully contacts the subscriber, and the subscriber confirms that he has not moved his SIP phone, there will be no impact on the subscriber's service. If MCI customer service is unsuccessful in its attempt to contact the subscriber, MCI will suspend that subscriber's service. Suspended subscribers who attempt to make outbound calls will hear a recorded message instructing them to call MCI. If the subscriber indicates that he has moved his SIP phone to a new location, the subscriber's service will be suspended (but 911 calls will continue to be routed to the PSAP associated with the primary Registered Location) unless the subscriber registers a location at which MCI can provide that specific subscriber with 911 service.

3. Summary of MCI's Compliance Plan

- a. MCI already provides 911 at the primary, Registered Locations for all of its existing Neighborhood Broadband Calling and MCI Advantage subscribers. MCI will not add any new subscribers whose primary Registered Locations are in areas in which it cannot provide 911 capability.
- b. MCI expects to implement the procedures described in this letter on or before November 28, 2005. In particular, MCI will be notified automatically any time an end user attempts to use his IP-enabled CPE at a location other than his Registered Location. Such attempted use will result in a suspension of service until either the subscriber confirms that he has returned to his Registered Location, or until MCI has processed a requested address change to a location in which MCI can provide that subscriber with 911 service.
- c. To support the cooperative efforts of the many entities, including public safety organizations, that must work together to make 911 possible for VoIP, MCI will contribute to the Public Safety Foundation, the Fraternal Order of Police Foundation, or similar organization on the following basis: MCI will contribute an amount equal to \$0.25 per subscriber per day for the number of days that each subscriber remains grandfathered (as described in this paragraph)

⁹ MCI plans to check its subscriber base for new IP addresses every fifteen minutes and will attempt to contact the subscriber within sixty to ninety minutes from detection of the new IP address.

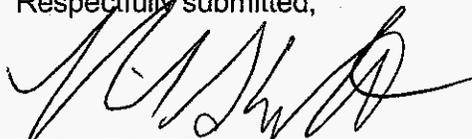
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through December 31, 2005. Beginning January 1, 2006, the payment will increase to \$0.50 per subscriber per day; on February 1, 2006 the payment will increase to \$0.75 per subscriber per day; and on March 1, 2006, the payment will increase to \$1.00 per subscriber per day for any subscribers that remain grandfathered. For purposes of this section, grandfathered subscribers will include any subscriber for whom MCI has not implemented the automatic move detection capability described in this letter to detect subscriber attempts to move the interconnected VoIP services.

- d. To enable the most expeditious expansion of our 911 footprint, MCI will implement new commercially reasonable technological solutions for our interconnected VoIP service offerings in areas served by selective routers.
- e. MCI will file compliance updates with the Commission each month detailing its progress in implementing the steps outlined above, unless the Commission relieves MCI of this obligation.

MCI remains fully committed to the Commission's objective of providing consumers with vital public safety services such as 911. We look forward to continuing to work with all parties to ensure that the Commission's commendable goals are met.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. S. Whitt', written over a horizontal line.

Richard S. Whitt