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November 14, 2005

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A325
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

On November 10, 2005, Don Shephard and Kelsi Reeves of Time Warner Telecom as well as Thomas Jones and Kevin Joseph on behalf of Time Warner Telecom, met with Tom Navin and Julie Veach of the Wireline Competition Bureau to discuss the technical obstacles associated with E911 in a multi-telephone system environment. The attached presentation formed the basis of the discussion.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), one electronic copy of this notice is being filed in each of the above-referenced proceedings.

Sincerely,

/s/

Thomas Jones

Attachment

cc: Tom Navin
Julie Veach

TIME WARNER  TELECOM

CONNECTING YOUR BUSINESS TO MORE BUSINESS™

Provision of E911 in an MLTS Environment

November 10, 2005

TWTC Offers Both TDM- and IP-Based Trunk Services

- IP-based trunk services are functionally similar to TDM-based trunk services
- Both are fixed services delivered to CPE at a specific customer location for the purpose of connecting to the PSTN
- TWTC's IP Trunk Service does not provide voice service access via the public Internet
- TWTC assigns blocks of native telephone numbers to static IP addresses provisioned on permanent hardware, which does not support nomadic use of customer CPE
- TWTC does not offer consumer or business VoIP "external line" subscriber services

FCC Definition of MLTS

- “A key feature of multi-line systems is that they allow multi-line businesses and multi-tenant building managers to align their external telecommunications traffic needs with demand from their internal users, which eliminates the need for an external line for each telephone within their operation. As such, while each telephone within the organization has a unique telephone number that the multi-line systems recognizes for directing internal traffic and inbound external calls, outbound external calls may not have a unique telephone number since they would be carried over lines capable of being used by any telephone set within the multi-line systems. Over time these systems have developed to include wireless systems and IP-based private networks.” *E911 Scope NPRM* ¶ 82.

E911 In An MLTS Environment

- A PBX is a MLTS
- E911 cannot function for individual telephones served by PBX equipment (CPE), unless the transmission provider, the equipment manufacturer and the customer/administrator each performs separate functions
- The transmission provider's switches must recognize 911 calls as emergency calls and relay the calls along with ANI to the selective routers, selective router databases and/or PSAP
- The manufacturer's CPE must enable the customer to populate SRDB and ALI database and transmit ANI associated with individual telephones served by the CPE
- The customer must correctly populate and update the CPE configuration, ALI database and SRDB

TWTC Performs The Functions Required Of A Provider Of PBX Trunks . . .

- TWTC's switches support E911 where the proper ANI is transmitted
- TWTC assigns newly provisioned PBX trunks a BTN and ensures that the trunk location and BTN information are transmitted to and included in the SRDB and ALI database
- TWTC can assign separate BTNs to multiple registered locations served by the customer's PBX
or
- In accordance with industry practice, TWTC will direct the customer to third-party vendors of PS-ALI software to associate individual CPNs with registered locations

... But TWTC Cannot Track The Location of End-Users of Its Trunk Services ...

- Blocks of native telephone numbers (TNs) only are allocated to TWTC customers (PBX administrators) for their use in making assignments to their specific end-user station
- PBX Administrators manage their private numbering plan. They may elect to assign the TWTC provided TNs to end-user stations, or use internal private numbers at their discretion.
- As a trunk-based solution, TWTC cannot control or track adds/moves/changes of individual end-user stations, or the method of connecting end-user stations configured by customer PBX Administrators.

... And TWTC Cannot Ensure E911 Delivery For Users of Its Trunk Services

- There are at least three points of potential E911 failure that exist regardless of whether a provider of trunk services can support the delivery of E911:
 1. CPE does not support E911 because it cannot or is not configured to send ANI (as is the case with some legacy PBX equipment)
 2. Customer fails to transmit the correct ANI associated with telephones served by the CPE; and
 3. Customer fails to populate and update the ALI database and SRDB with accurate location information for each telephone served by the CPE

E911 Solutions For IP “Line” Services Cannot Be Used By A Provider Of IP “Trunk” Services

- AT&T, Verizon and MCI plan to update the location of a nomadic VoIP customer by causing the disconnection of the adapter from a power source to trigger a process for updating the user’s location
- Providers of IP trunks cannot implement this approach because it requires a direct line termination to the telephone set or adapter being disconnected. The trunk transmission provider cannot “see” beyond the demarcation point of the PBX equipment.

Diagram of TDM MLTS

Typical TDM PRI/Digital Trunk Customer

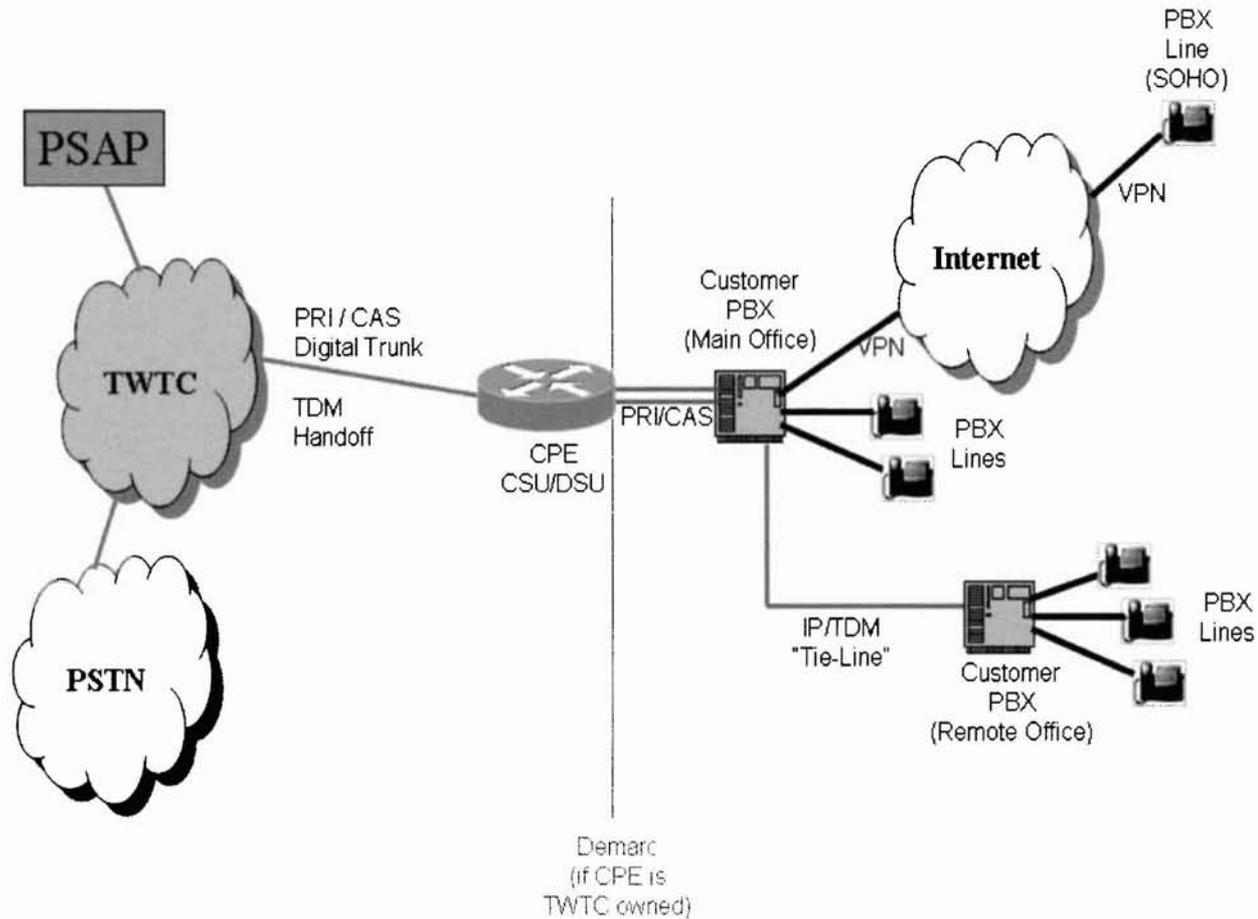


Diagram of IP MLTS

Typical IP Trunk Customer

