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November 17, 2005

Via Electronic Filing

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

Re: Ex Parte Notice in WC Docket Nos. 04-36 and 05-196

Dear Ms. Dortch:

Yesterday Frank Manning, President of Zoom Technologies, Inc. ("Zoom") and the undersigned, counsel to Zoom, met with Kathryn Berthot and Colleen Heitkamp, both of the Enforcement Bureau, and Nicholas Alexander of the Wireline Competition Bureau. This letter is accordingly submitted pursuant to Section 1.1206(b)(2) of the Commission's Rules to provide notice of a permitted oral *ex parte* communication in the above-referenced proceeding.

In this meeting we discussed the attached supplement to Zoom's Compliance Letter. We explained how Zoom's TelePort™ technology, by causing an ATA or similar VoIP device to route a subscriber's 911 calls directly to the subscriber's local exchange carrier ("LEC"), is an efficient and cost-effective solution by which interconnected VoIP providers can comply with the Commission's E911 VoIP rules. We emphasized that the latest generation of TelePort technology ensures that subscribers maintain the crucial link between the TelePort-enabled VoIP device and a live PSTN connection in a range of conditions, including power outages.¹ We also discussed what would happen if the TelePort-enabled VoIP device lost a live PSTN connection, and explained that Zoom's latest TelePort-enabled VoIP equipment would notify the VoIP service provider automatically so that appropriate action could be taken, and would also give an audible indication to the user of the TelePort-connected telephone.

¹ The PSTN connection need only allow 911 calls; all other calls can be handled by the interconnected VoIP provider as VoIP calls.

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We explained that Zoom's own interconnected VoIP service, Global Village™, relies on the latest generation of TelePort-equipped technology. We concluded that use of the TelePort™ technology is an appropriate means to comply with the Commission's E911 rules for interconnected VoIP providers properly using the TelePort equipment.

Please direct any questions concerning this information to the undersigned.

Sincerely,



Gerard J. Waldron
Counsel to Zoom Technologies, Inc.

Attachment

cc (by e-mail): Nicholas Alexander
Colleen Heitkamp
Kathryn Berthot



November 16, 2005

VIA ELECTRONIC FILING

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

Re: Supplemental Letter to Compliance Report of Global Village;
WC Docket Nos. 04-36 and 05-196

Dear Ms. Dortch:

On October 21, 2005 Zoom Technologies Inc. ("Zoom"), which operates the interconnected VoIP service known as Global Village™, filed a letter in the above-captioned dockets detailing its compliance with the Commission's E911 rules for interconnected VoIP providers.¹ As explained in its Compliance Letter, by relying on the TelePort™ technology, all 911 calls placed by our VoIP subscribers will not originate as VoIP calls but rather will be directed to the subscriber's local exchange carrier ("LEC") for delivery to the well-established Wireline E911 Network.

Subsequent to the filing of Zoom's Compliance Letter, the Enforcement Bureau released a Public Notice elaborating upon the "specific information that interconnected [VoIP] service providers must include in the Compliance Letters."² The information requested starts with the premise that the responding VoIP provider allows subscribers' 911 calls to originate on the Internet as VoIP calls. For example, the Notice instructs providers to include a quantification of "the number of Selective Routers to which it has interconnected, directly or indirectly."³ For a

¹ See Letter from Frank Manning, President, Zoom Technologies Inc. to Marlene H. Dortch, Secretary, FCC (filed Oct. 21, 2005), citing *E911 Requirements for IP-Enabled Service Providers*, 20 FCC Rcd 10245 (2005).

² See *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, Public Notice, DA 05-2945 (rel. Nov. 7, 2005).

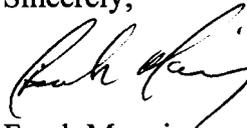
³ *Id.* at 3.

VoIP provider that has ensured all subscribers have TelePort equipment, there is no need to interconnect with Selective Routers because routing is handled by each subscriber's local telephone company and the attached public switched telephone network.

As a result, the Commission should find that Zoom stands in compliance with the Commission's requirements if it has established a mechanism to ensure that subscribers (a) have TelePort-equipped VoIP equipment, and (b) that equipment maintains a live PSTN connection to which 911 calls are directed. As Zoom documented in its Compliance Letter, by Nov. 28, 2005 all subscribers will have the latest generation of TelePort technology, which satisfies both prerequisites to E911 access. The Commission therefore should deem Zoom and any other interconnected VoIP provider relying on the latest TelePort technology to be in compliance with the E911 rules.

Please direct any questions concerning this information to the undersigned

Sincerely,



Frank Manning

President, Zoom Technologies Inc.

cc (by e-mail): Joseph P. Casey
Kathryn S. Berhot
Nicholas Alexander