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November 21, 2005

Ex Parte

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

Re: In the Matter of IP-enabled Services, WC Docket No. 04-36; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

On November 18, 2005, Kathleen Grillo, Maureen Napolitano, Leslie Owsley, and Doug Sullivan of Verizon met with Julie Veach and Ian Dillner of the Wireline Competition Bureau regarding the above-referenced proceedings. Mike Armstrong and John Rollins of Verizon participated by telephone. At this meeting, Verizon discussed its concerns regarding various proposals to access selective routers by means of the public switched telephone network. The attached presentation formed the basis of the discussions.

Pursuant to Section 1.1206(b) of the Commission's rules, one electronic copy of this notice is being filed in the above-referenced proceeding.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Grillo".

Attachment

cc: Julie Veach
Ian Dillner



Verizon

November 18, 2005

Problems with PSTN Access to Selective Routers

- Problems identified in September 2005 by NENA Working Group
- ESRNs must be “dialable” in order for switching equipment to process the 911 calls
- 911 Calls are not sent over dedicated trunks
 - 911 calls are not prioritized over other calls
 - 911 calls could be blocked during high volume calling periods
- **Security concerns**
 - Using “dialable” ESRNs potentially exposes PSAPs to “denial of service” attacks or other attempts to intentionally disrupt the 911 system