Texas 9-1-1 Alliance

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Ex Parte

November 23, 2005

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:

The Texas 9-1-1 Alliance supports that the Federal Communications Commission (FCC) take immediate action on the current request for a p-ANI administrator to further enable Voice over Internet Protocol (VoIP) E9-1-1 deployments. In most areas of Texas, we currently have interim p-ANI administrators (SBC [now at&t] and Verizon) that are currently allocating p-ANIs to VoIP Positioning Centers (VPCs) to enable the VoIP Service Providers (VSPs) to provision VoIP E9-1-1 services in accordance with FCC VoIP E9-1-1 requirements. In one area of Texas and in some other parts of the country, it is our understanding that some Incumbent Local Exchange Companies (ILECs), as a numbering resource, have not voluntarily stepped up to be interim p-ANI administrators. In these cases, a p-ANI administrator is urgently needed – otherwise VSPs may be forced to attempt to use dialable numbers and create all sorts of potential E9-1-1 operational problems and issues or VoIP deployments may be delayed contrary to the safety interests of the public.

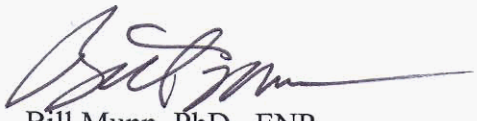
The Texas 9-1-1 Alliance also feels strongly that the p-ANI administrator should allocate p-ANIs to only VPCs (not VSPs) because of the operational, service provisioning impact, and numbering concerns that have been identified as associated with allocation of p-ANIs directly to VSPs. In Texas, p-ANIs are currently being allocated to only VPCs, and we request that any FCC action on p-ANI administrator not disturb the current allocation process of allocating only to VPCs in

[1] The Texas 9-1-1 Alliance is an interlocal cooperation act entity composed of the Texas Health and Safety Code Chapter 772 Emergency Communication Districts with E9-1-1 service public safety responsibility for approximately 50% of the population of Texas. The Texas 9-1-1 Alliance members joining in these comments are: Abilene/Taylor County 9-1-1 District, Austin County Emergency Communications District, Bexar Metro 9-1-1 Network District, Brazos County Emergency Communication District, Calhoun County 9-1-1 Emergency Communication District, Cameron County Emergency Communications District, 9-1-1 Network of East Texas, Denco Area 9-1-1 District, Emergency Communications District of Ector County, Galveston County Emergency Communication District, Greater Harris County 9-1-1 Emergency Network, Henderson County 9-1-1 Communication District, Howard County 9-1-1 Communication District, Kerr Emergency 9-1-1 Network, Lubbock Emergency Communication District, McLennan County 9-1-1 Emergency Assistance District, Midland Emergency Communications District, Montgomery County Emergency Communication District, Potter-Randall County Emergency Communications District, Smith County 9-1-1 Communications District, Tarrant County 9-1-1 District, Texas Eastern 9-1-1 Network, and Wichita-Wilbarger 9-1-1 District.

Texas. The Texas 9-1-1 Alliance further urges the FCC to do whatever it can to promote the VPCs using the allocated p-ANIs only to serve VSPs that are collecting and remitting the 9-1-1 emergency service fees to local 9-1-1 administrative entities in the manner provided for under applicable state and local laws.

Thank you for the opportunity to comment on these important issues.

Respectfully submitted,



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