



Ecuity Advanced Communications
Compliance Report
WC Docket No. 05-196

On November 22, 2005 Ecuity Advanced Communications completed final production testing of our E9-1-1 Services capabilities. WC Docket No. 04-36, FCC 05-116 (*Order*) requires the following reporting instances:

911 Routing Information/Connectivity to Wireline E911 Network:

Currently through our network providers, our VOIP customers will have access to 154 E9-1-1 Selective Routers by November 28th 2005. Included with this document is a map of MSA's in the United States where Ecuity is fully compliant with the VoIP 911 Order, as well as a chart of expected compliance to all MSA's in the United States. It should be noted, that Ecuity's E9-1-1 services is available to 95% of our VOIP subscribers today. We expect 100% availability by June of 2006.

911 Solutions:

The E9-1-1 solution enabled by Ecuity provides a solution for VoIP Service Customers and Wholesale Partners subscribing to Ecuity's VOIP products. Ecuity enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the Customers and Wholesale Partners is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Ecuity manages the VPC functionality and the Call delivery component on behalf of the Customer and Service Provider, thereby enabling a full end to end solution from one service provider.

The only customer requirements for delivery of the E9-1-1 service are the ongoing delivery of address and telephone number information to Ecuity via a real-time interface and the connectivity to the Ecuity network to enable live 9-1-1 call delivery.

Transmission of ANI and Registration Location Information:

Basic PSAP: Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, the enclosed "Basic PSAP" map could be used as reference information. While these areas are not included within the FCC Order and are not required for compliance, Ecuity is actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery.

ANI Only: There are unique deployment circumstances in areas of the US and Puerto Rico that operates off E9-1-1 Selective Routers, but will not meet the full FCC mandate. Ecuity is currently aware of four (4) States and a Territory that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

New Jersey - In the State of New Jersey permission has been granted to deploy a voice only service which includes the call taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. Ecuity currently does not have any customers in the State of New Jersey

Ohio - To date, Ohio has not granted permission to deploy a voice only solution. The State ALI system is not capable of full dynamic ALI update. Ecuity currently does not have any customers in the State of Ohio.

Hawaii - To date, Hawaii has not granted permission to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Ecuity currently does not have any customers in the State of Hawaii.

Puerto Rico - To date, Puerto Rico has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update. Ecuity currently does not have any customers in Puerto Rico

911 Coverage:

The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the customer subscriber base priorities. The attached “Major Market Deployment Map”, which corresponds with MSA’s, identifies regions within Ecuity’s territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. These areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This map demonstrates FCC compliance for the November 28th requirements and the future deployment strategy.

Obtaining Initial Registered Location Information

As a component of Ecuity’s provisioning process, no user is permitted to utilize VoIP services without location registration information submitted and validated. At this time, all users have been validated within Ecuity’s Validation and Update Interface.

Obtaining Updated Registered Location Information

Ecuity’s Validation and Update Services provides a near real time provisioning interface to register subscriber location change information. This process ensures the proper address and call back information is delivered to the appropriate PSAP at the time of a VOIP 911 call. At the time of a 911 call, the customer’s provisioned information is

utilized to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Ecuity's network partners to determine appropriate PSAP for the delivery of the MSAG Valid address and call back number of the user.

Technical Solution for Nomadic Subscribers:

At this time, nomadic users (Soft Phone Clients) are not permitted to utilize 911 functions. At this time, Ecuity does not have a mechanism to automate the location update information for traveling users. All users agree to the limitations of this service prior to service activation. Ecuity recognizes the need for removing the user interaction and self provisioning component of the solution. To that end, Ecuity is actively working on location determination technologies, which will support the Ecuity provisioning.

We believe that with this system in place and with this filing, we have complied with the FCC VoIP Order. In Accordance with FCC rules, a copy of this letter is being filed electronically in the above referenced docket.

Sincerely,

Jon Schnelz
Vice President
Ecuity Advanced Communications