

November 28, 2005

**VIA ELECTRONIC MAIL**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Ex Parte Communication, WC Docket No. 05-196  
Subscriber Acknowledgement Report, November 28, 2005

Dear Secretary Dortch:

In response to the Federal Communications Commission's ("Commission") rules spelled out in the *First Report and Order* in the subject-named dockets governing voice over internet protocol ("VoIP") E911 and subsequent clarifying directions by the Commission's Enforcement Bureau ("Bureau"), PAETEC Communications, Inc. ("PAETEC") is hereby providing to the Commission a report on its compliance with the Commission's rules.

PAETEC is currently developing its VoIP retail product and has rolled out only a de minimis number of commercial test applications to certain vertical market enterprise customers. Specifically, PAETEC has established three test interconnected VoIP services arrangements.

PAETEC, a facilities-based competitive local exchange carrier ("CLEC") utilizes its existing wireline E911 network for all VoIP phones located within PAETEC's service network area. PAETEC has installed the necessary equipment to connect its VoIP network to the applicable E911 trunk groups that lead to specific selective routers in order to forward a 911 call to the correct public safety answering point ("PSAP") or emergency center. PAETEC provides E911 in California, Connecticut, Delaware, District of Columbia, Florida, Illinois, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, and Virginia. PAETEC provides automatic number identification ("ANI") and registered location for the contracted VoIP subscriber to meet the requirements of the rules and as acceptable to the applicable PSAP. For the avoidance of doubt, in the case of a college or a university, the contracted subscriber is the college or university not the individual students. PAETEC provides the registered location and call back number as detailed and coordinated through the college

or university. This location could be the college security office or a specific room within a building depending on the discretion of the college.

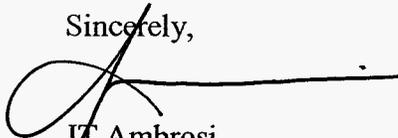
Obtaining a subscriber's registered location is part of the standard information required to set up a new subscribers account whether the service is VoIP or wireline telecommunications. In the case of the current test sites, PAETEC has the original registered locations for all three of its interconnected VoIP test subscribers.

Currently, PAETEC's customers are able to update their location by directly calling the customer service number provided. The ability to update their registered location is available to PAETEC's customers twenty-four (24) hours a day, seven (7) days a week. Thus the customer is able to update their registered location at will. PAETEC is working on programming that would permit the VoIP customers to update their registered location via the Internet and this programming is scheduled to be completed January 1, 2006.

PAETEC's current and projected enterprise VoIP customers are provided with equipment that is not intended to be nomadic in nature. Traditionally, with regard to PAETEC's existing wireline customer base, customer premise equipment ("CPE"), where provided by PAETEC, is also expected to remain on the customer premise. Regardless, in order to be in compliance with the applicable rules regarding VoIP and its potential to be a nomadic service, PAETEC is not actively pursuing customers in either the mass market or enterprise retail space in areas where PAETEC cannot provide associated E911 services. PAETEC, in partnership with its VoIP switching and wholesale vendors, is working on new technologies to provide E911 for nomadic VoIP customers. However, until such time as that technology is available, PAETEC's self-imposed marketing restrictions will apply and customers within PAETEC's service areas will be clearly warned of the nomadic services limitations per PAETEC's customer disclosure. This disclosure was provided to the Commission in previous correspondence.

Should you have any questions on this submission, please feel free to contact me at any time.

Sincerely,



JT Ambrosi  
Vice President, Carrier and Government Relations

Enclosure

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