1500 Market Street
Philadelphia PA 19102

November 28, 2005

Filed via ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Interconnected Voice Over Internet Protocol 911 Compliance Letter
WC Docket No. 05-196

Dear Ms. Dortch:

Comcast Corporation hereby submits this letter documenting its compliance with the rules established in the June 3, 2005 order issued by the Federal Communications Commission ("Commission") concerning Enhanced 911 ("E911") requirements for providers of interconnected voice over Internet protocol ("VOIP") services.[1] As described in its August 10, 2005 report regarding the subscriber notification and acknowledgement portion of the Commission's rules, Comcast Corporation is proud to affirm that 911 and E911 functionality have been included as a feature of its interconnected VOIP service from the outset.[2] Set forth below is the specific information requested in the November 7, 2005 Public Notice issued by the Enforcement Bureau.[3]

911 Solution: Comcast currently provides only a facilities-based, fixed location interconnected VOIP service using geographically relevant telephone numbers based on

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[1] IP-Enabled Services and E911 Requirements for IP-Enabled Service Provider, First Report and Order and Notice of Proposed Rulemaking, WC Docket Nos. 04-36 and 05-196 (rel. June 3, 2005) ("VOIP E911 Order"). This filing encompasses Comcast's primary IP-enabled voice service as well as an IP-enabled service Comcast provides to a limited number of circuit-switched telephone customers in the Detroit, Michigan area. These services are referred to collectively as "interconnected VOIP service."

[2] *See* In the Matter of E911 Requirements for IP-Enabled Service Providers, *Subscriber Notification Report of Comcast Corporation*, WC Docket No. 01-196 (dated August 10, 2005) at p. 3.

[3] Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters, WC Docket Nos. 04-36 and 05-196, DA 05-2495 (rel. Nov. 7, 2005).

existing rate centers. As described in more detail below, the method by which Comcast provides 911 service to its customers is the same method as is employed by providers of circuit-switched telephone service. Comcast provides 911 service in compliance with the Commission's requirements to one hundred percent of its customers.

- **911 Routing Information / Connectivity to Wireline E911 Network:** Through partnerships with competitive local exchange carrier ("CLEC") affiliates in each state, Comcast interconnects directly with the Wireline E911 network. Comcast transmits all 911 calls to the appropriate public safety answering point ("PSAP"), designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated under section 64.3001 of the Commission's rules. In areas where Selective Routers are used, 911 calls are routed through the use of ANI via the dedicated Wireline E911 Network using the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 network as are necessary. Through its CLEC affiliates and as of today, Comcast has interconnected with 81 Selective Routers throughout the territory in which its interconnected VOIP service is available. Comcast has worked directly with state and local agencies responsible for emergency services to set up and test its 911 trunking. In areas where selective routers are not used, or in the very rare instances where the ANI system or ALI database fails, Comcast routes 911 calls using the default emergency services number that is programmed into the switch serving each customer based on the county and rate center of the customer's Registered Location.

- **Transmission of ANI and Registered Location Information**: Comcast transmits its customers' ANI and Registered Location to all answering points that are capable of receiving and processing this information. Accordingly, Comcast transmits ANI and Registered Location information to answering points that are capable of receiving and processing this information for one hundred percent of its customers of interconnected VOIP service. In fact, of the 244 counties in which Comcast's interconnected VOIP service is currently available or for which the design phase has been completed, only one does not support E911. Comcast only recently launched its interconnected VOIP service in that one county and does not yet provide service to any customers in that county. As a result, at present, all current customers of Comcast's interconnected VOIP service have access to E911.

- **911 Coverage**: Comcast complies with the Commission's 911 requirements for providers of interconnected VOIP service in all areas of the country in which it is currently providing such service.

Obtaining Initial Registered Location Information: The interconnected VOIP service that Comcast provides is a fixed location service that travels over Comcast's own managed network. Accordingly, the address at which service will be provided is a necessary prerequisite for determining whether a potential customer is able to receive Comcast's interconnected VOIP service. In addition, as Comcast has always provided 911 and E911 functionality with its interconnected VOIP service, obtaining the customer's Registered Location has always been a required element of the order entry and provisioning process for

each and every customer. Comcast matches the address provided by the customer to the corresponding address in the Master Street Address Guide and updates the ALI database accordingly with the customer's physical location and telephone number.[4] Also, at present, installation of Comcast's interconnected VOIP service requires that a Comcast technician make a service call to the customer premises.[5] As a result, Comcast has obtained Registered Location information from one hundred percent of its customers as a routine and necessary part of the order entry, provisioning and installation process. The dates and methods of contact used to obtain this information will vary for each customer according to the date and manner in which each customer ordered service.

Obtaining Updated Registered Location Information: The Commission's rules require that providers of interconnected VOIP services that can be used from more than one physical location must provide their end users with one or more methods of updating information regarding the user's physical location. As stated above, the interconnected VOIP service currently offered by Comcast is a fixed location service that is not intended nor permitted to be used at any physical location other than the Registered Location for each customer. Nevertheless, Comcast does have a process in place for those customers who want to move their embedded multimedia terminal adapter ("eMTA") to a different address. A Comcast customer that wants to move his or her eMTA to a new service address must seek prior authorization from Comcast by placing a telephone call to our toll-free nationwide customer service number so that Comcast can determine whether or not the new address is serviceable for interconnected VOIP service. In the event that a customer notifies Comcast about a change to his or her Registered Location and Comcast determines that the new address is serviceable for interconnected VOIP service, including 911/E911 functionality, Comcast will approve the relocation of the eMTA and update the ALI database accordingly with the customer's new address.

Technical Solution for Nomadic Subscribers: Comcast does not currently market a nomadic interconnected VOIP service and thus has not yet developed nor implemented a technical solution for ensuring that its customers will have access to 911 service whenever they use the service nomadically. To the extent that Comcast, in the future, markets a nomadic interconnected VOIP service, it will comply with any applicable requirements concerning the ability to manually or automatically update the Registered Location information for each customer. In the meantime, Comcast transmits 911 calls to the appropriate PSAP, based on the Registered Location provided by the customer, in all areas in which Comcast markets its interconnected VOIP service.

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[4] Comcast takes proactive measures to ensure that the information in the ALI database is accurate by performing an annual database reconciliation for each of its customers in every ALI database nationwide. Comcast also provides contact information for PSAP operators to investigate ALI discrepancies twenty-four hours per day, seven days per week.

[5] We anticipate that, in the future, Comcast may offer a self-installation kit that can be used by the customer to install services without the need for a service call by a Comcast technician. However services are installed, obtaining the customer's Registered Location will remain a requirement of the order entry and provisioning process.

In conclusion, Comcast is proud of the efforts it has made to ensure customers of its interconnected VOIP service have access to 911/E911 service. I trust this provides the information required in this matter. Please let me know if you have any questions or require further information.

Sincerely,

/s/ Joseph W. Waz Jr.
Joseph W. Waz Jr.
COMCAST CORPORATION
1500 Market Street
Philadelphia PA 19102

cc: Berry Best
Kathy Berthot
Janice Myles