

November 28, 2005  
**Electronic Filing Via ECFS**

Ms. Marlene H. Dortch, FCC Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743  
Attention: Office of the Secretary

**RE: E-911 Requirements for IP-Enabled Service Providers, WC Docket  
No. 05-196; IP Enabled Services, WC Docket No. 05-196**

Dear Ms. Dortch:

Submitted herewith on behalf of ISN Telcom, LLC is a compliance report on the status of its implementation of E-911 service, as required by the First Report and Order in the above-captioned proceedings, FCC 05-116, 20 FCC Rcd 10245 (released June 3, 2005) (“*Order*”); Public Notice, “Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters”, WC Docket Nos. 04-36, 05-196, DA 05-2945 (released Nov. 7, 2005) (“*Public Notice*”).

Any questions you may have regarding this filing may be directed to me at (407) 740-3008, or [cneeld@tminc.com](mailto:cneeld@tminc.com).

Sincerely,

Craig Neeld  
Consultant to ISN Telcom, LLC

cc: Byron McCoy – FCC  
Kathy Berthot – FCC  
Janice Myles - FCC  
G. Rosman ISN  
file: ISN - FCC E911  
tms: FCCv0504

## COMPLIANCE LETTER

### 1. 911 Solution

#### a. 911 Routing Information/Connectivity to Wireline E911 Network:

We have contracted with a third-party provider and have been working actively to meet the deadline. The current 911 solution is able to deliver emergency calls to 100% of the PSAPs via a 10-digit number. This solution provides 100% coverage in the United States. In the event a call cannot be delivered directly to the PSAP the caller is routed to a national call center with trained emergency operators. This 24/7 support is beyond the requirements of the FCC order.

Access to selective routers for delivery of voice to PSAP is an extremely costly and time-consuming procedure. This requires physical interconnection to over 650 selective routers owned by the ILECS as well as conversion of the call from IP to TDM. There are very few carriers capable of meeting this requirement and most are CLECs, such as Level 3, Global Crossing, and XO. However, none have 100% coverage and all have varying levels of support. Each requires use of their own DIDS in order to use their E911 infrastructure. They also require substantial upfront investments along with high recurring monthly charges. Finally, these existing solutions only support static numbers and cannot support out of area telephone numbers (foreign NPA/NXXs). For that we need a VPC provider.

Our third-party provider, who is also a VPC provider, has contracted with one of these CLECs with access to over 70% of the US population and is in negotiations to interconnect with other CLECs in order to reach the rest of the US population. The process of converting from the I1 solution to the I2 solution is underway. However, it could not be completed by today.

#### b. Transmission of ANI and Registered Location Information:

Our third-party provider has been actively involved in meeting the requirements of this order but given the short timeframes this is proving very difficult.

Delivery of ANI and registered location information to the PSAP requires connection agreements with all the ILECs, frame relay circuits to all the ALI databases, testing of links and data exchange, and loading of ESQKs into all the ALI databases. The circuit ordering timeframe is usually 4 - 6 weeks. Our third-party provider is installing these circuits but the 120 day timeframe from the FCC did not allow enough time to negotiate interconnection agreements with the ILECs and then order the circuits.

In addition, ESQKs have to be assigned and allocated. This issue current sits with the FCC to name an interim administrator for these non - dialable numbers. Without FCC guidance, it is nearly impossible to deploy services on a nationwide basis. This is stated in an ex parte filing from Tom Goode, Associate General Counsel of the Alliance for Telecommunications Solutions' (ATIS) Emergency Service Interconnection Forum (ESIF), to the Honorable Kevin J. Martin, Chairman, Federal Communications Commission:

*On September 8, 2005, the NANC submitted these recommendations to the Chief of the Wireline Competition Bureau for approval. Included in this submission was a timeframe indicating that pANI administration for VoIP needed to commence by October 3, 2005, in order for all involved parties to meet the Commission's November 28, 2005, deadline for VoIP*

*E911 solutions. However, as of the date of this letter, the Interim Routing Number Authority has not been established.*

*In the absence of a centralized pANI administrator and guidelines, VoIP Service Providers (VSPs) and other parties developing VoIP E911 solutions may not be able to meet the November 28, 2005, deadline for E911 service. This is contrary to ESIF's mission to advance emergency communications technology, and does not serve the public interest. In a significant part of the U.S., there is no mechanism for pANI administration. Without this administration, a VSP would need to use dialable numbers, an ineffective solution. Further, a VSP may not have access to these numbers on a nationwide basis, which could lead to additional delays in meeting the Commission's November 28, 2005, deadline.*

*ESIF recognizes that, even if the Commission were to approve the NANC recommendations quickly, a number of requests for extension of the November 28, 2005, deadline likely will still be filed. However, a delay in Commission action would likely further frustrate the implementation of VoIP E911 solutions. The anticipated Interim RNA has indicated that it will need 30 days after the Commission's decision to begin pANI allocation. Further, based on feedback from VSPs Positioning Center, the deployment and testing of these ESQKs will take another 60 to 90 days.*

Finally, this solution requires testing with over 6000 PSAPs to meet the deadline. This takes time as each PSAP must be tested with each ESQK. Again the 120 day timeframe doesn't allow enough time to get interconnection agreements with each ILEC, provision circuits, create ESQK shell records, and then schedule/execute testing with 6000 PSAPs. Our third - party provider has this effort underway but it is time consuming. The wireless industry has had years to perform this same effort and they are not complete yet,

Until these issues are resolved, our third-party provider has developed a web - based solution that allows PSAPs to see the real - time ANI/ALI information for each VoIP call. This gives the PSAP access to callback information when the call is delivered via the I1 solution.

c. 911 Coverage:

Based on the issues above, full compliance has not yet been achieved, However, our third - party provider has been actively working with NENA, ATIS, the VON Coalition, as well as with every ILEC to complete the ESQK assignment process and finalize the ANI/ALI links. In addition, access to the selective routers is being achieved through partnerships with CLECs throughout the country. This is an extremely time-consuming and costly process which is multiplied given the tight timeframes.

2. The second main bullet point in the *Public Notice* requests detailed information on actions the provider has taken to obtain existing subscribers' current Registered Location and new subscribers' initial Registered Location, including dates, methods of contact, and percentages of subscribers from whom such information has been obtained. ISN has received 93% of customer acknowledgements from its customers. Our third party provider has made it a policy with ISN that all end-user subscribers in the United States who will be utilizing E-911 Service must have an initial valid Registered Location.

3. The third main bullet point requires information on methods by which end-user subscribers can update their Registered Locations. ISN is providing a website as well as a 24/7 toll-free number for subscribers to update their address when a customer changes locations.

#### 4. Technical Solution for Nomadic Subscribers

We have a real-time interface between our platform and our third-party provider that allows address validation and PSAP assignment. This allows our subscribers to enter a new 911 address on our site and have verification that the address is valid and that 911 service is activated for the new site.