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November 28, 2005

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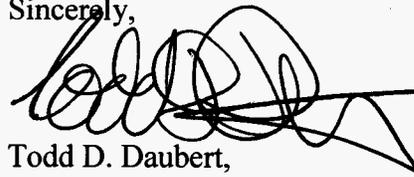
Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WC Dockets Nos. 05-196 and 04-36
Compliance Letter

Dear Ms. Dortch:

my people (“my people”), by its attorneys, and on behalf of itself and its state operating affiliates (collectively “my people”), hereby respectfully files the attached “Compliance Letter” in accordance with the requirements set forth in the Federal Communication Commission’s Public Notice, *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 05-2945 (rel. November 7, 2005). Please feel free to contact the undersigned if you have any questions or need additional information.

Sincerely,



Todd D. Daubert,
Counsel for my people

Attachment

my people
Interconnected VoIP 911 Compliance Letter
WC Dockets 04-36 and 05-196

my people (“my people”) submits the following 911 Compliance Letter (“Compliance Letter”), which contains all of the information described in the Federal Communications Commission’s (“Commission” or “FCC”) Public Notice, *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 05-2945 (rel. November 7, 2005) (“Public Notice”).

my people’s 911 Solution

my people provides 911 service, in compliance with the rules established in the Commission’s *VoIP 911 Order*¹ to 100% of its customers.

911 Routing Information/Connectivity to Wireline E911 Network

my people transmits “all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing 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 in those areas where Selective Routers are utilized.”² my people purchases third party 911 service from Level 3. Accordingly, as of November 28, 2005, my people is indirectly interconnected with 315 Selective Routers.

Transmission of ANI and Registered Location Information

my people transmits, via the Wireline E911 Network, the 911 caller’s registered location and automatic numbering information (“ANI”) to all answering points that are capable of receiving and processing the information. As of November 28, 2005, 100% of the answering points within my people’s service area are capable of receiving and processing ANI and registered location information. Of my people’s customers, 100% have their registered location information and ANI transmitted to answering points capable of processing that information.

911 Coverage

As of November 28, 2005, my people has achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all of its service areas.

¹ *In re: IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, 20 FCC Rcd 10245 (2005) (“VoIP 911 Order”).

² *Public Notice, 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 05-2945 at 3 (rel. Nov. 7, 2005) (“Public Notice”).

Obtaining Initial Registered Location Information

my people has obtained the registered location information for all of its customers, in compliance with the Commission's *VoIP 911 Order*. my people did not begin providing interconnected VoIP services until October 24, 2005. As such, my people's sales and provisioning systems were designed to comply with the *VoIP 911 Order*. For each new VoIP customer, my people collects the registered location information from the Customer before service is initiated.

Obtaining Updated Registered Location Information

At this time, my people offers interconnected VoIP services only on a fixed basis. As such, customers must contact my people whenever they wish to establish a new service address, at which time my people would gather registered location information from the customer using the same procedures that apply to new customers. Moreover, as discussed above, in order to facilitate collection and verification of its customers' registered service locations, my people has established a toll free number that customers can call using the same equipment they use to access their interconnected VoIP service.

Technical Solution for Nomadic Subscribers

At this time, my people does not offer nomadic interconnected VoIP services.