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FILING VIA ECFS

November 28, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW B-204
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of E911 Requirements for IP-Enabled Service Providers*,
WC Docket Nos. 04-36 and 05-196 – November 2005 Compliance Report

Dear Ms. Dortch:

In a recent Public Notice¹ the Enforcement Bureau of the Federal Communications Commission (“Commission”) outlined the information it wanted included in November 2005 Compliance Letters filed by interconnected Voice over Internet Protocol (“VoIP”) service providers, in line with the requirements of the *VoIP E911 Order*.²

The purpose of this communication is to submit Qwest’s November 2005 Compliance Letter. Should the Commission have any questions regarding its content, please contact me at the above-indicated contact information.

Sincerely,

/s/ Melissa E. Newman

Enclosure (Attachment A)

cc: Byron McCoy – FCC (byron.mccoy@fcc.gov)
Kathy Berthot – FCC (kathy.berthot@fcc.gov)
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¹ *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket No. 04-36, WC Docket No. 05-196; Public Notice, DA 05-2945, rel. Nov. 7, 2005.

² *In the Matters of IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, WC Docket Nos. 04-36, 05-196, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245 (2005) (“*VoIP E911 Order*”), *appeals pending sub nom., Nuvio Corporation v. FCC*, No. 05-1248 (D.C. Cir. *pet. for rev. filed* July 11, 2005).

ATTACHMENT A

OWEST'S NOVEMBER 28, 2005 COMPLIANCE LETTER **WC DOCKET NOS. 04-36 AND 05-196**

PUBLIC NOTICE REQUIREMENT

- “911 Solution: This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*. Further, the detailed description of the technical solution should include the following components:
 - 911 Routing Information/Connectivity to Wireline E911 Network: A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, “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.”¹ If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.”

OWEST'S RESPONSE

Within its traditional 14-state service territory, Qwest is transmitting 99.76% of 911 calls to the appropriate PSAP. Approximately 25 Foreign Exchange (“FX”) records are not native to the Selective Router associated with the serving wire center. A few more than half of these 25 FX records are associated with employees. With respect to the other half of the FX records, the large majority of the customers have in-region addresses and telephone numbers. A few records show an in-region phone number and an out-of-region address. These FX accounts are routed based on the NPA/NXX combination of the assigned telephone number to a 10-digit administrative number.

Outside of its traditional service territory, Qwest only offers business VoIP service in those rate centers that offer full E911 capability. It is, therefore, delivering 100 percent of 911 calls to the appropriate PSAP.

¹ *In the Matters of IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245, 10269-70 ¶ 42 (2005) (footnotes omitted).

Within its traditional 14-state local service territory, Qwest is connected to 40 Selective Routers. Outside of its traditional service territory, to 315 Selective Routers.

PUBLIC NOTICE REQUIREMENT

- “Transmission of ANI and Registered Location Information: A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller’s ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider’s service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller’s ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.”

QWEST’S RESPONSE

Qwest incorporates its above response into this response with respect to items (ii) and (iii) and offers the additional following information with respect to item (i): 96% of the PSAPs in Qwest’s traditional service region are E911 capable.

PUBLIC NOTICE REQUIREMENT

- “911 Coverage: To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.”

QWEST’S RESPONSE

With the exception of the above-referenced 25 FX accounts (in Qwest’s first response), Qwest has achieved the IP-enabled E911 obligations outlined in the *VoIP 911 Order*. The MSAs implicated by the FX numbers are: Salt Lake City-Ogden-UT; Denver-Boulder-Greeley-CO; Fort Collins-Loveland-CO; Seattle-Tacoma-Bremerton-WA; Minneapolis-St. Paul-MN-WI; Dallas-Fort Worth-TX; Columbus-OH; Decatur-IL; Washington-Baltimore-DC-MD-VA; and Atlanta-GA.

PUBLIC NOTICE REQUIREMENT

- “Obtaining Initial Registered Location Information: A detailed description of all actions the provider has taken to obtain each existing subscriber’s current Registered Location and each new subscriber’s initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.”

QWEST’S RESPONSE

For consumer customers, Qwest obtains the initial Registered Location during the service ordering process. This can occur either through direct contact with a Qwest sales representative or via a Web portal. At this time, Qwest has Registered Location information for all of its consumer customers, although the information associated with those users who have FX service cannot be processed through the Selective Routers. For business customers, the initial Registered Location is established at the time the service is ordered. Qwest has Registered Location information for all its business subscribers. Qwest has communicated with its customers through a variety of means over the past five months about its VoIP E911 services. Those communications have stressed the criticality of address information to E911 service delivery and discussed generally the concept of Registered Location information. Qwest outlined its communication activities in Qwest’s August 10, 2005 Subscriber Notification Report Attachment.

PUBLIC NOTICE REQUIREMENT

- “Obtaining Updated Registered Location Information: A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.”

QWEST’S RESPONSE

Qwest consumer subscribers can update their Registered Location information either through contact with a service representative or by accessing a Web portal. Qwest coordinates with business customers who wish to update a service location so that the chosen location will be E911 capable. In those situations where a service location change is appropriate to be made, the change can be made through the same equipment the customer uses in connection with Qwest’s VoIP service.

PUBLIC NOTICE REQUIREMENT

- “Technical Solution for Nomadic Subscribers: A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.”

QWEST’S RESPONSE

Consumer customers may move locations after updating their Registered Location via a Web portal, so long as customers stay within the service boundaries of the same Selective Router to which the original service was established. The Web portal rejects all Registered Location updates to locations outside the Selective Router boundaries. Beyond this, Qwest continues to evaluate various technical solutions to accomplish the mobility goals referenced in the Commission’s Public Notice.²

² See *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket No. 04-36, WC Docket No. 05-196, Public Notice, DA 05-2945, rel. Nov. 7, 2005, wherein the Enforcement Bureau discusses the compliance plan that AT&T is implementing to address this problem.