

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matters of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
E911 Requirements for IP-Enabled Service Providers)	WC Docket No. 05-196

**RNK, Inc., d/b/a RNK Telecom
Compliance Report – November 28, 2005
FCC WC Docket No. 05-196**

In accordance with the section 9.5(f) of the Commission's VoIP E911 Rules¹ and the November 7, 2005 Public Notice issued by the Enforcement Bureau of the Federal Communications Commission (the "Commission"), in WC Docket No. 05-196, RNK, Inc. d/b/a RNK Telecom ("RNK") hereby submits its report to the Commission on its compliance with the VoIP E911 Rules.

I. RNK's 911 Solution

A. Coverage of RNK's Subscribers

To date, RNK provides 911 service in compliance with the VoIP E911 Rules to 59% of its subscriber base.² These end users are located in RNK's existing CLEC footprint.³ For these end users, all 911 calls are transmitted "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."⁴ Within RNK's existing footprint, it is directly connected to 18 Selective Routers.

In Local Access and Transport Area ("LATA") 224 in New Jersey, RNK negotiated and entered into an interconnection agreement, provisioned facilities, and ordered 911 trunks from the local ILEC.⁵ As long as the provisioning of service moves

¹ 47 C.F.R. § 9.1-9.5.

² See E911 coverage map attached hereto as Attachment 1.

³ Massachusetts, New Hampshire, Rhode Island, and New York (LATA 132).

⁴ IP-Enabled and 911 Requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245, 10273 para. 42 (2005)(VoIP E911 First Report and Order).

⁵ Request of RNK Inc., d/b/a RNK Telecom – Expedited Action Required (WC 05-196) (11/3/05) para. II(B) ("*RNK's Waiver Petition*").

forward without issue, RNK is hopeful it will be able to provide E911 service to end users through direct interconnection in LATA 224 by May 28, 2006. Until such time, however, RNK will provide E911 service to end users in NJ LATA 224 through a major telecommunications provider with whom RNK has partnered.

RNK is also working with this provider and a second, well known CLEC provider that, together (“Third Party Providers”⁶), offer compliant E911 coverage to ninety (90) major U.S. markets. As of the date of this report, RNK has made available to end users in the coverage areas of these Third Party Providers basic 911 service with the transmission of ANI (but not Registered Location) information. RNK is optimistic that it will be able to transmit Registered Location information in conjunction with 911 calls placed by end users served by these Third Party Providers within the next two to three months. With these solutions, RNK is interconnected indirectly with 148 Selective Routers and will cover an additional 22% of its subscriber base.⁷

For the remaining 19% of its subscriber base, RNK has been in negotiations with Intrado regarding its VoIP V-911 Mobility Services®, and with other providers, in an effort to offer end users with some form of E911 service.⁸ These solutions, however, may entail the routing of 911 calls to 10-digit NPA-NXX numbers of PSAPs or call centers. RNK has requested additional time from the Commission, specifically until November 27, 2006 to provide a compliant solution to these end users.⁹ The Commission has not yet ruled on RNK’s Waiver Petition.

B. Transmission of ANI and Registered Location Information

Pursuant to the *VoIP E911 First Report and Order*, the VoIP E911 Rules pertaining to transmission of ALI and ANI information for a particular Registered Location are applicable “only to the extent that the PSAP, designated statewide default answering point, or appropriate local emergency authority designated to serve that Registered Location is capable of receiving and utilizing the data, such as ALI or ANI...”¹⁰ As stated in section I(A) above, RNK is transmitting ANI and Registered Location information in those areas in which it has CLEC certification (representing 59% of its subscriber base), and will soon transmit both ANI and Registered Location information through those Third Party Providers with whom it has contracted to provided service to an additional 22% of its existing subscriber base.

In the event RNK opts to contract with a third party provider to implement a solution not presently compliant with the Commission’s VoIP E911 Rules in an effort to provide some form of basic 911 service on an interim basis to those VoIP end users

⁶ Due to confidentiality restrictions in its contracts, RNK is unable to disclose the identities of these providers. However, in the event that the Commission or Division Staff requires this specific information, and if there is a protective order or other similar measure in effect, RNK will supply such confidential information in an appropriate form.

⁷ See E911 coverage map attached hereto as Attachment 1.

⁸ *Id.*

⁹ *RNK’s Waiver Petition* para III.

¹⁰ *VoIP E911 First Report and Order* para. 42.

presently without any form of emergency services calling, the transmission of ANI and/or ALI information may not be possible, or traditional wireline ALI databases may not be used.

II. Obtaining Initial Registered Location Information

Prior to the initiation of service, new subscribers to RNK's VoIP service must provide accurate Registered Location at the time they sign up for the service. End users provide this information when they complete the E911 acknowledgement process, which informs them of the limitations of 911 associated with their VoIP service.¹¹ As subscribers complete this process, they are advised of the importance of providing updates related to their Registered Location to ensure continued E911 service, where available. Those subscribers that fail to confirm their Registered Location and complete the acknowledgement process will not be permitted to activate their VoIP service.

Existing end users within RNK's footprint who signed up for VoIP service prior to the release of the Commission's *VoIP E911 First Report and Order* were required to provide a Registered Location in order for RNK to provision E911 service. Existing subscribers outside of RNK's CLEC footprint who signed up for VoIP service prior to the release of the Commission's *VoIP E911 First Report and Order*, may not have completed the E911 acknowledgement process. As RNK implements E911 service to those end users located in the E911 coverage areas of the Third Party Providers with whom RNK has contracted, RNK will obtain Registered Locations from those end users from whom it does not already possess this information.

III. Obtaining Updated Registered Location Information

Subscribers of RNK's service may update their Registered Location's through three methods: 1) Through an online submission process; 2) By pressing *77 on their VoIP CPE¹²; or 3) By calling customer service through a toll-free number. End users are asked to provide at least ten (10) days notice to RNK so that their transition to the new Registered Location is seamless and, where available, E911 service is uninterrupted. While the full 10-day interval is rarely needed to update an end user's Registered Location, RNK has erred on the side of caution in adopting this conservative interval since there are inconsistencies between the manner in which the MSAG stores address information and what a VoIP end user believes to be his or her physical address. As a result, it can take additional time to resolve these inconsistencies and confirm a customer's new location through the MSAG. In RNK's current wholesale model, for example, RNK typically does not have direct contact with IVS customers, but instead, RNK works with independent resellers who communicate with their end user subscribers. Thus, in the event RNK needs to work with an independent reseller to properly register the new Registered Location, it may take several days before E911 is available at the new address.¹³

¹¹ *VoIP E911 First Report and Order* para. 48.

¹² Customer Premises Equipment.

¹³ *See Comments of RNK Inc., d/b/a RNK Telecom*, para. IV(A) (WC 05-106) (August 15, 2005).

