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November 28, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D. C. 20554

**Re: VoIP E911 Compliance Letter of Charter Communications, Inc.; WC Docket
Nos. 05-196, 04-36**

Dear Ms. Dortch:

Pursuant to the FCC's Voice Over Internet Protocol ("VoIP") 911 Order¹ and the Enforcement Bureau's November 7, 2005 Public Notice concerning the compliance letter requirements for interconnected VoIP service providers,² Charter Communications, Inc. ("Charter") on behalf of its subsidiaries,³ hereby provides a report on its efforts to comply with the FCC's interconnected VoIP E911 rules.

Set forth below are specific responses to the categories of information identified in the November 7th Public Notice.

I) Scope of Coverage of 911 Solution

100% of Charter's subscribers have access to 911 service in compliance with the rules established in the Commission's VoIP 911 Order.

¹ *In Re IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245 (rel. June 3, 2005).

² *See* Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters, Public Notice, DA 05-2945 (rel. Nov. 7, 2005).

³ Charter Fiberlink-Missouri, LLC, Charter Fiberlink MA-CCO, LLC, and Charter Fiberlink, LLC.

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A) 911 Routing Information/Connectivity to Wireline E911 Network:

Charter transmits all 911 calls via dedicated trunks to the applicable ILEC selective router for delivery to the appropriate PSAP. 100% of Charter's transmission of 911 calls is delivered via existing wireline networks: initially these calls are transmitted over Charter's network and upon reaching the ILEC's network, via the ILEC's trunk line(s) between the Selective Router and the PSAP (at no time do Charter's 911 calls traverse the Internet).

As of this date Charter interconnects, directly or indirectly, to thirty-five (35) different selective routers. All Charter 911 connections have primary and secondary paths to each selective router. These connections serve 100% of Charter's customer base.

B) Transmission of ANI and Registered Location Information:

Charter sends all 911 calls to the appropriate selective router where a database "dip" occurs, in turn causing appropriate name, address, and number information to be routed to the appropriate PSAP along with the 911 call. Charter utilizes this process on 100% of its 911 calls. 100% of the answering points to which Charter transmits 911 information are capable of receiving name, address, and phone number relating to 911 calls (all are E-911 capable).

C) 911 Coverage:

Charter has achieved full compliance with the requirements of the VoIP 911 Order in all areas in which it provides service.

II) Obtaining Initial Registered Location Information:

Charter obtains registered location information for 100% of its subscribers at the time of the subscriber service request. In other words, registered location information is obtained at the earliest stages of the establishment of a service relationship between Charter and new subscribers. A customer cannot obtain service from Charter without first providing a service address, which also serves as the registered location, to Charter. Charter has collected service location (registered location) information from 100% of its subscribers.

III) Obtaining Updated Registered Location Information:

Charter does not offer nomadic service to its subscribers. If a subscriber desires to move to a new service location the subscriber must notify Charter and disclose the new service location. At the time of service installation, Charter provides to its subscribers 911

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acknowledgement forms and stickers detailing the requirement that a subscriber notify Charter in the event the customer desires to relocate their service to a new address (registered location).

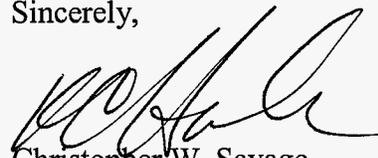
Subscribers can provide notice of a relocation to Charter via a personal visit to a local retail office or by calling Charter directly. Charter currently utilizes an MTA that is installed at the subscriber's service address. Charter subscribers do not purchase this equipment and such equipment is intended to remain at the subscriber location. Charter does not currently allow a customer to relocate this equipment to a new service address. In the event a customer contacts Charter and discloses that he has moved the MTA equipment to a new location, Charter will undertake to install service at this new location (provided the new location is within a Charter service area) at the request of the subscriber. Similarly, if a new subscriber moves into a home where a prior Charter customer resided, the new subscriber may make use of the installed MTA.

IV) Technical Solution for Nomadic Subscribers / Compliance Plans:

Charter does not offer nomadic services. It has always been Charter's policy to provide 911 service to its telephone subscribers. Charter has offered 911 service since its first telephone subscriber installation in 2002 and as a result has no need to grandfather any customer. Charter's network includes various checks and associated alarms which allow Charter to monitor functionality of its network equipment, including when an MTA is not functioning. In the event such an alarm is received it will be checked and corrected as expeditiously as possible consistent with existing protocol.

Please contact the undersigned counsel for Charter Communications at the telephone number listed above if you have any questions about this filing. Thank you for your assistance.

Sincerely,



Christopher W. Savage
K.C. Halm

Enclosures

cc: Byron McCoy, Enforcement Bureau
Kathy Berthot, Enforcement Bureau
Janice Myles, Wireline Competition Bureau
Best Copy and Printing, Inc. Portals II
Carrie Cox, Charter Communications, Inc.