

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
E911 Requirements for IP-Enabled Service Providers)	WC Docket No. 05-196
)	
deltathree, Inc.)	
Petition for Extension and Limited Waiver)	

PETITION FOR EXTENSION OF TIME AND LIMITED WAIVER

deltathree, Inc. (“deltathree” or the “Company”), pursuant to Section 1.3 of the Commission’s Rules,¹ requests that the Commission grant a limited waiver extending the time for it to comply with the obligations imposed on deltathree pursuant to Commission Rule 9.5(b) and (d) adopted in the *First Report and Order* in the above-captioned proceedings.² As explained in detail below, despite having made substantial progress toward meeting the requirements of the *VoIP E911 Order*, deltathree will be unable to comply fully for all of its ICH (as defined below) interconnected Voice over Internet Protocol (“VoIP”) customers (collectively, the “Customers”) by the November 28, 2005 deadline. Accordingly, deltathree requests a nine-month extension of time to comply with those obligations. deltathree also may require additional

¹ 47 C.F.R. § 1.3.

² *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, WC Docket Nos. 04-36 & 05-196, FCC 05-116 (released June 3, 2005) (“*VoIP E911 Order*”). Commission Rule 9.5 (b) and (c), 47 C.F.R. §§ 9.5(b) and (c), implementing the *VoIP E911 Order* are scheduled to take effect on November 28, 2005.

time depending on the specifics of the VoIP E911 deployment, as explained below, to fully comply with those obligations.³ deltathree also requests expedited consideration of this Petition.

I. DESCRIPTION OF THE PETITIONER

deltathree is a provider of Internet telephony solutions to consumers, resellers and service providers worldwide. It offers VoIP services including broadband phone and PC to phone through its VoIP consumer division, iConnectHere (“ICH”). deltathree has provided a description of its service offerings to the Commission in its compliance report submitted on the same date as this Petition.⁴ Pursuant to the definitions adopted in the *VoIP E911 Order*, deltathree is a provider of interconnected VoIP services through the ICH division, as ICH: (1) enables real-time, two-way voice communications; (2) requires a broadband connection from the user’s location; (3) requires Internet protocol-compatible customer premises equipment (“CPE”); and (4) permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network.⁵

deltathree has taken a number of steps to comply with the Commission’s new rules. deltathree has substantially met the affirmative acknowledgment requirements set forth in 47 C.F.R. § 9.5(e).⁶ deltathree has also taken steps to obtain Registered Location information from

³ Included as Exhibit A to this filing is a map that illustrates Intrado’s planned VoIP E911 deployment schedule. The map was provided to deltathree by Intrado for use in this filing. According to Intrado’s deployment schedule, it expects to have nationwide coverage, subject to certain conditions, in place by June 2006. While Intrado expects to have coverage in seven months, deltathree is asking for a nine month extension based on the delays the Company has experienced in the run up to the November 28, 2005 deadline.

⁴ See Letter to Marlene H. Dortch from Eugene Serban, Corporate Counsel of deltathree, Inc., WC Docket Nos. 04-36 and 05-196 (filed Nov. 28, 2005) (“*deltathree Compliance Report*”)

⁵ See 47 C.F.R. § 9.3.

⁶ Pursuant to Commission Public Notices, deltathree has filed three status reports concerning the Company’s efforts to notify its Customers of the limitations associated with the

its Customers. deltathree has completed upgrades to its website that allows Customers to provide and update their Registered Location Information. This system is also used for billing, notification and affirmative acknowledgement procedures, and other account status information. Further, the Company has implemented a signup procedure that captures customer location information that is used as Registered Location information by the Company and its vendors. deltathree believes that it has obtained Registered Location information on approximately 60% of its customer through these systems and procedures. Finally, deltathree has taken significant steps to implement the E911 service requirements established in 47 C.F.R. § 9.5(b) and (c). Specifically, deltathree determined it did not have the resources to independently deploy full E911 service for all of its VoIP Customers by the Commission's deadline and has contracted with a third-party to deploy its VoIP E911 solution. That solution is discussed in Section IV.

Despite deltathree's efforts, it will not be in compliance with the requirements of the *VoIP E911 Order* by the Commission's November 28, 2005 deadline. Currently, deltathree does not have a VoIP E911 solution in place for any of its Customers. However, based on its discussions with and commitments from Intrado, deltathree expects to have a VoIP E911 solution in place for 42% of its Customers by December 2005 and for substantially all of its customers within nine months. This estimate is predicated on Intrado's statement that it will have access to at least one Selective Router per county by June 2006 (where Selective Routers are utilized). Accordingly, deltathree cannot determine at this time whether full coverage will be

Company's VoIP 911 service, and to obtain affirmative acknowledgments from those subscribers stating that they fully understand those limitations. These reports were filed in WC Docket No. 04-36 on August 10, September 1, and September 22. The Company's September 22, 2005 status report informed the Commission that, as of September 22, 2005, deltathree had obtained affirmative acknowledgement from approximately 91% of its subscriber base. Since then, deltathree has obtained affirmative acknowledgement from approximately 94% of its subscriber base. As requested by the Commission, deltathree will inform the Commission when the 100% threshold is met.

reached by June 2006 or whether a small number of customers may still be without full E911 service in counties that have two or more Selective Routers where Intrado has not interconnected with all available Selective Routers.⁷ deltathree will make submissions to the Commission in the event it appears that some of its customers will not have full E911 coverage as currently anticipated. In addition, deltathree requires additional time to obtain Registered Location information for the approximately 40% of its Customers who have not provided that information.

II. SPECIFIC WAIVERS REQUESTED

deltathree respectfully requests a limited waiver allowing it a nine month extension of time to implement the following requirements of the *VoIP E911 Order*:

- 1) The requirement to transmit all 911 calls, in all geographic regions served by the Wireline E911 Network, along with the ANI and the caller's Registered Location for each call, to the PSAP, designated statewide default answering point, or appropriate local emergency authority.⁸
- 2) The requirement to route all 911 through the use of ANI and, if necessary, pseudo-ANI.⁹
- 3) The requirement to provide the Registered Location to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.¹⁰
- 4) The requirement to obtain from each customer, prior to the initiation of service, the physical location at which the service will first be utilized and provide end users one or more methods of updating their Registered Location, including at least one option that requires use only of the CPE necessary to access the interconnected VoIP service.¹¹
- 5) To the extent necessary, deltathree seeks a limited waiver of Section 9.5(b)(1) of the rules to permit deltathree to continue to market its VoIP service and sign up new Customers

⁷ As discussed below, all deltathree customers who do not have full E911 services will have access to emergency services via a 10-digit number.

⁸ See 47 C.F.R. § 9.5(b)(2).

⁹ See 47 C.F.R. § 9.5(b)(3).

¹⁰ See 47 C.F.R. § 9.5(b)(4).

¹¹ See 47 C.F.R. § 9.5(d).

during the time that deltathree needs to comply fully with the requirements of Sections 9.5(b) and (c) of the rules.¹²

III. STANDARD OF REVIEW

Section 1.3 of the Commission's Rules states that the Commission may waive its rules for good cause, which has been interpreted to exist when the facts of a particular case make strict compliance inconsistent with the public interest and when the relief requested will not undermine the policy objective of the rule in question.¹³ To prevail, a petitioner must demonstrate that application of the challenged rule would be inequitable, unduly burdensome, or contrary to the public interest.¹⁴

The Commission's approach to requests for waivers in the wireless area is illustrative. Section 1.925(b)(3) of the Commission's Rules is comparable to Section 1.3 and provides that the Commission may grant a request for waiver if:

- (i) The underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest; or
- (ii) In view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative.¹⁵

¹² In its Public Notice dated November 7, 2005, the Enforcement Bureau stated that it expects that "providers will discontinue marketing VoIP service, and accepting new customers for their service, in all areas where they are not transmitting 911 calls to the appropriate PSAP in full compliance with the Commission's rules." *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, DA 05-2945, at 5 (rel. Nov. 7, 2005).

¹³ 47 C.F.R. § 1.3. *See Wait Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *see also Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990).

¹⁴ *Wait Radio*, 418 F.2d at 1159.

¹⁵ 47 C.F.R. § 1.925(b)(3).

The Commission has also made clear in the wireless E911 context that technical infeasibility and delays beyond the control of the carrier, including the inability to obtain required products or services despite good faith efforts by a petitioner, is reason to grant a waiver.¹⁶

IV. PETITIONER MEETS THE STANDARD FOR GRANTING A WAIVER

A. Unusual Factual Circumstances Justify the Requested Waivers

deltathree has long sought a means to provide E911 service to its Customers. However, because its service is offered over the public Internet, deltathree's service can be used from anyplace in the United States or the world, and deltathree cannot practicably limit the geographic locations from which its Customers might access the service. Therefore, a complete nationwide solution is required to provide E911 service that complies with the *VoIP E911 Order*. This poses a much greater challenge for deltathree than is faced by traditional telecommunications carriers or facilities-based VoIP providers whose networks have a more defined geographic footprint.

Even before the issuance of the *VoIP E911 Order*, deltathree had determined that it would be impossible for deltathree to contact, negotiate, and contract with all the necessary parties to implement and manage a nationwide network-based E911 solution. deltathree therefore evaluated a number of VoIP E911 solution providers. At first, the Company planned to use the services of more than one provider due to the geographic limits associated with each of the proposed solutions. Prior to entering into a contract with Intrado, deltathree decided to work with another leading provider. However, as the November 28, 2005, deadline approached, it became clear that the solution provider deltathree planned to use did not offer an adequate E911 solution that would be compatible with nomadic VoIP services or VoIP services that allow for

¹⁶ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Phase II Compliance Deadlines for Tier III Carriers*, CC Docket No. 94-102, Order, FCC 05-79, released Apr. 1, 2005 ("*Wireless E911 Tier III Second Waiver Order*") at ¶ 10.

the assignment of non-native telephone numbers – both functionalities are part of the deltathree VoIP service offering. deltathree thus lost valuable time and had limited ability to evaluate, test, and integrate an E911 solution provided by its current vendor – Intrado – in order to meet the Commission’s November 28 deadline.

As a result of these late-breaking developments, deltathree entered into an agreement with Intrado on October 18, 2005, to provide a comprehensive E911 solution. As part of the agreement with Intrado, deltathree was required to order voice and data circuits. The provisioning of these circuits is taking 6 to 8 weeks. With respect to data circuits, deltathree was further delayed because Intrado did not have circuits immediately available due to an ordering backlog because of the unanticipated number of Intrado customers using such circuits. As a result, deltathree expects to implement the Intrado E911 solution by mid-December 2005.

Intrado’s service provides 911 service using direct trunking to selective routers, as well as routing calls to PSAPs through the use of 10-digit telephone numbers approved by the relevant PSAP. Intrado works with PSAPs to determine the appropriate telephone numbers for routing 911 calls, but the solution may not provide ANI and Registered Location information to all applicable PSAPs. Intrado provides ANI and Registered Location information when routing 911 calls in the majority of the top 20 MSAs in the continental United States and a few areas outside the top 20 MSAs. Intrado is currently working to deploy this solution in more MSAs, and thus expand its coverage to a wider proportion of deltathree’s Customers and nationwide service area. Given the lack of comprehensive coverage by Intrado, it is not a complete solution. As detailed in Section I, deltathree will not have 911 service in place for any of its Customers until mid-December 2005. By mid-December, however, deltathree anticipates that 42% of its Customers will be covered by E911 service that complies with the *VoIP E911 Order*, and

deltathree expects that substantially all of its Customers will have full coverage within nine months.

Another major complicating factor in deploying a VoIP E911 solution for deltathree is that third-party solution providers, like Intrado, are dependant on the efforts of third parties to deploy an E911 solution, including RBOCs and PSAPs. Circumstances beyond Intrado's control impact deltathree's ability to deploy an E911 solution. For example, in order to deploy a VoIP E911 solution for nomadic VoIP services, Intrado requires access to pseudo-ANI ("p-ANI"). As described by certain members of Congress as well as industry experts in multiple *ex parte* filings with the Commission,¹⁷ the lack of the appointment of an interim Routing Number Authority has made it impossible for Intrado to access p-ANI in certain areas of the country impeding the deployment of a VoIP E911 solution. Also, in certain areas, PSAPs are either declining or being advised to decline entering into agreements with VoIP providers due to the lack of legislation protecting VoIP providers and PSAPs from any liability that may result from mistakes that may arise in the routing or handling of 911 calls. As the Commission is aware, wireline and wireless carriers are legally protected from mistakes that may occur with the routing and handling of 911 calls. Neither Intrado nor deltathree have the ability to resolve these issues.

The Commission recognized in the *VoIP E911 Order* that the timeframe for the deployment of VoIP E911 was "aggressive."¹⁸ In fact, deployment of an E911 solution for a

¹⁷ See, e.g., *Ex Parte* Letter from The Honorable Joe Barton, et al. to Chairman Kevin J. Martin, Chairman, Federal Communications Commission (dated Nov. 22, 2005); *Ex Parte* Letter from Robert C. Atkinson, NANC Chair to Thomas Navin, Chief Wireline Competition Bureau, FCC (filed Sept. 8, 2005); *Ex Parte* Letter from David F. Jones, President, National Emergency Number Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 04-36 & 05-196 (filed Nov. 4, 2005); *Ex Parte* Letter from Tom Goode, Associate General Counsel, Alliance for Telecommunications Solutions', to Marlene H. Dortch, Secretary, FCC, WC Docket No. 04-36 & 05-196 (filed Nov. 2, 2005).

¹⁸ *VoIP E911 Order*, ¶ 37.

new technology in 120 days is without precedent. VoIP providers, third-party solution providers, VoIP positioning companies, state and local E911 officials, and RBOCs are faced with unique issues to resolve and in the midst of developing a standard for the delivery of VoIP E911 calls.¹⁹ Further, each RBOC has demonstrated a different level of cooperation in deploying a VoIP E911 solution and has adopted different implementation procedures. The 120-day implementation timeframe has not allowed enough time for the industry to resolve all of these disparate issues in order to develop a comprehensive solution. Given the novel issue that arise in deploying a VoIP E911 solution, coupled with the 120-day timeframe, it was simply not possible for the industry to develop a comprehensive VoIP E911 solution.

As the Commission has said before, delays that are beyond the control of a provider or the inability of a provider to obtain required products or services despite good faith efforts, provides reason to grant a waiver.²⁰ deltathree has made good faith efforts to obtain an E911 solution that complies with the *VoIP E911 Order*, but will not be in full compliance by November 28. deltathree respectfully submits that the unusual circumstances associated with its deployment of a VoIP E911 solution justify the limited relief deltathree seeks.

¹⁹ See *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, Reply Comments of NENA, WC Docket Nos. 04-36 & 05-196 (filed Sept. 12, 2005) (stating that NENA was still in the process of developing the standard, and has sought industry comments on a preliminary proposal).

²⁰ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Phase II Compliance Deadlines for Tier III Carriers*, CC Docket No. 94-102, Order, FCC 05-79, released Apr. 1, 2005 (“*Wireless E911 Tier III Second Waiver Order*”) at ¶ 10.

B. Grant of an Extension of Time and Limited Waiver to deltathree is in the Public Interest; Strict Enforcement of the November 28 Deadline Will Thwart the Purposes of the Commission's Rules

Strict adherence to the requirements of the *VoIP E911 Order* is inconsistent with the public interest with respect to deltathree. deltathree has made good faith efforts to comply with the requirements and has made progress toward compliance. Moreover, it has a plan in place that ultimately will enable it to comply fully with the Commission's rules. However, for reasons that are largely beyond its control, deltathree will not be able to provide full E911 service to all of its Customers by November 28. Demanding strict compliance with the *VoIP E911 Order* will not change the fact or further the Commission's goal of providing E911 to all consumers, but will only punish deltathree for its efforts to date. It could result in the suspension of service to a deltathree's Customers and prohibit deltathree from accepting new Customers. The result very well could be that deltathree will be less able to comply with the *VoIP E911 Order*. Customers will remain without E911 service, as deltathree will not have adequate resources to deploy a ubiquitous E911 solution, and deltathree's ability to compete in the VoIP market will be weakened. Such a result would not serve either the public interest and would thwart the goals of the *VoIP E911 Order* and the Commission's mandate to foster competition. Accordingly, a limited waiver of the requirements of the *VoIP E911 Order* with respect to deltathree is necessary and is in the public interest.

1. deltathree's Plan to Achieve Full Compliance

In addition to the steps that it has already taken to implement the requirements of the *VoIP E911 Order*, deltathree has taken steps to achieve full compliance within a reasonable period. Grant of this Petition will give deltathree the time and resources to carry out its compliance plan. As discussed, deltathree has contracted with Intrado to provide an E911 solution to deltathree. Pursuant to correspondence with Intrado, deltathree understands that 93%

the U.S. population is served by PSAPs operating off an E911 Selective Router. Although areas not served in this way are not included in the *VoIP E911 Order*, Intrado is nevertheless determining whether there are technical options for VoIP E911 native call delivery. Also, Intrado is currently aware of five jurisdictions that have native Selective Routing functionality but will only provide Automatic Number Identification (ANI)-only service (not Registered Location information) to the PSAP. In New Jersey, Intrado has gained permission from the State to deploy a voice only service that enables the call taker to receive ANI on the VoIP 911 caller, but the State ALI system is not capable of full dynamic ALI updates and will require an upgrade. Ohio and Hawaii have not granted permission to Intrado to deploy a voice only solution, and these States' ALI systems are not capable of full dynamic ALI update. Puerto Rico has not granted permission to Intrado to deploy a voice only solution, and the ALI systems are not capable of full dynamic ALI update.

According to Intrado, it will provide access to 154 E911 Selective Routers as of November 28, 2005. The attached Major Market Deployment Map (Exhibit A) depicts Intrado's planned rollout of E911 services from November 28, 2005 to June 30, 2006.²¹ Attached as Exhibit A to this filing is a map provided to deltathree by Intrado. deltathree has been advised by Intrado that Intrado will provide E911 coverage for approximately 42% of deltathree's customer base by mid-December. Intrado has further advised that it plans to deploy E911 services for at least one selective router per county as set out in Exhibit A. If Intrado is able to achieve this level of deployment, an estimated 65% of deltathree's Customers will have E911 service by March 30, 2006 and 80% of deltathree's Customers will be covered by June 30, 2006.

²¹ Note that the market deployment map represents major markets where Intrado has connectivity to at least one Selective Router, ALI steering and the ability to populate ALI.

deltathree expects that the remainder of its Customers will obtain coverage by the end of the requested nine-month extension.

Deltathree also expect to obtain Registered Location information from the remainder of its interconnected VoIP customers. As previously discussed, deltathree already has completed upgrades to its website that allows customers to provide and update their Registered Location Information with the Company. This system is also used for billing, notification and affirmative acknowledgement procedures, and other account status information. In this way, deltathree has obtained Registered Location information for approximately 60% of its Customers. All new Customers are required to provide Registered Location information as part of their subscription process. In order to obtain Registered Location information from its remaining Customers, deltathree will contact those customers who have not responded to prior requests, first by email and voicemail and then by personal telephone calls to its Customers.

In addition, as part of the E911 solution being provided by Intrado, deltathree will have access to the Intrado validation and update interface (“VUI”) that enables near real-time delivery of new user address information or user submitted address update information. deltathree will be integrating the VUI into its existing provisioning systems to ensure seamless delivery of acquired registration location information to the Intrado system.

2. The Relief deltathree Seeks is in the Public Interest

In light of the circumstances described above, grant of a limited waiver and extension of time to deltathree is in the public interest. deltathree has made good faith efforts to comply with the requirements of the *VoIP E911 Order*. It has met the requirements of Rule 9.5(e) for over 91% of its Customers. I will meet the requirements of 9.5(b) and (c) for approximately 42% of its Customers by mid-December and for 80% or more of its customers by June 30, 2006. In

addition, deltathree has taken steps to ensure that all of its Customers have access to emergency services as soon as possible through 10-digit dialing. This service will be available from any location in the country. Routing to appropriate emergency answering points will be based on the Registered Location information that deltathree has on record. After validating the address information through the Master Street Address Guide database, Intrado will use the information to determine the appropriate emergency answering point. Intrado will route the call over the PSTN using a 10-digit telephone number approved by the answering point.²²

By demanding full compliance with the *VoIP E911 Order* by November 28, the Commission will make it more difficult for deltathree to come into full compliance. Strict adherence to the VoIP E911 Order could require deltathree to discontinue its services to some Customers and to cease accepting new Customers.²³ These actions would deprive existing Customers of access to deltathree's VoIP services and destroy deltathree's relationships with those Customers. In addition, the ability of deltathree to attract new Customers would be severely hampered. The loss of current Customers and the inability to accept new Customers will deprive deltathree of the ability to maintain or expand its user base and revenues. This would cause deltathree extreme economic hardship. More important for purposes of this Petition, the loss of those revenues would limit deltathree's ability to pay for the deployment of

²² Customers will automatically be migrated to Intrado's E911 solution as Intrado expands its E911 service footprint.

²³ While the Enforcement Bureau has indicated that it is not "requiring" providers to disconnect current customers, the full Commission has not addressed this issue, Commission Rule 9.5 remains fully in effect, and even the Bureau has made no commitment not to pursue enforcement actions against providers that continue to provide service. In particular, it is unclear whether VoIP providers can continue to service existing customers who change their registered location after November 28. Thus, the fact remains that non-compliant VoIP providers are in the untenable position of courting an enforcement action if they do continue to provide service to existing customers.

E911 service and make it less likely that deltathree will be able to comply in a timely manner with the requirements of the *VoIP E911 Order*. Such a result would not be in the public interest.

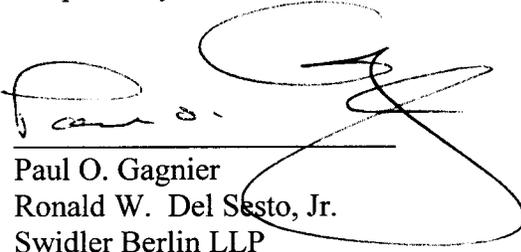
C. Grant of the Petition will not Undermine the Policy Objective of the *VoIP E911 Order*

As discussed above, deltathree has worked, and is continuing to work, to implement an E911 solution that meets the requirements of the *VoIP E911 Order*. Grant of the Petition will not undermine the policy goal that customers of interconnected VoIP providers have access to emergency services. deltathree is not requesting an exemption from or indefinite waiver of the rules. Rather, deltathree is merely seeking additional time so that it can meet those requirements fully for all of its customers. In other contexts—for example, wireless E911 and CALEA—the Commission has routinely issued limited waivers and extensions of time despite the significant public interests in the recognition that such limited waivers do not undermine the objectives of those rules. The situations here is no different. deltathree’s limited request for relief does not impair the public safety goals that underlie the Commission’s new rules. Accordingly, the Commission should grant the Petition.

V. CONCLUSION

For the reasons set forth above, deltathree respectfully submits that grant of this Petition for extension of time and limited waiver serves the public interest.

Respectfully submitted,



A handwritten signature in black ink, appearing to read "Paul O. Gagnier", is written over a horizontal line. The signature is stylized and somewhat illegible.

Paul O. Gagnier
Ronald W. Del Sesto, Jr.
Swidler Berlin LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Telephone: (202) 424-7500
Facsimile: (202) 424-4645

Attorneys for deltathree, Inc.

Filed: November 28, 2005

I, Eugene Serban, state that I am Corporate Counsel of deltathree, Inc.; that the foregoing Petition for Extension of Time and Limited Waiver ("*Waiver*") was prepared under my direction and supervision; and I declare under penalty of perjury that the *Waiver* is true and correct to the best of my knowledge, information, and belief.

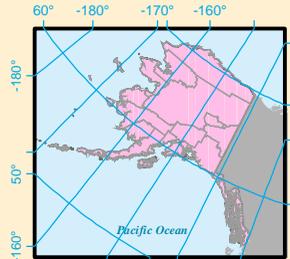


Name: Eugene Serban
Title: Corporate Counsel
deltathree, Inc.

Exhibit A

Intrado Major Market VoIP E911 Rollout Map

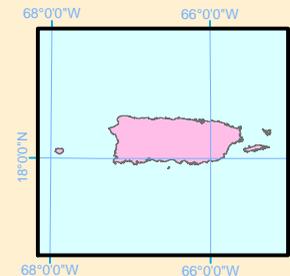
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Hawaii

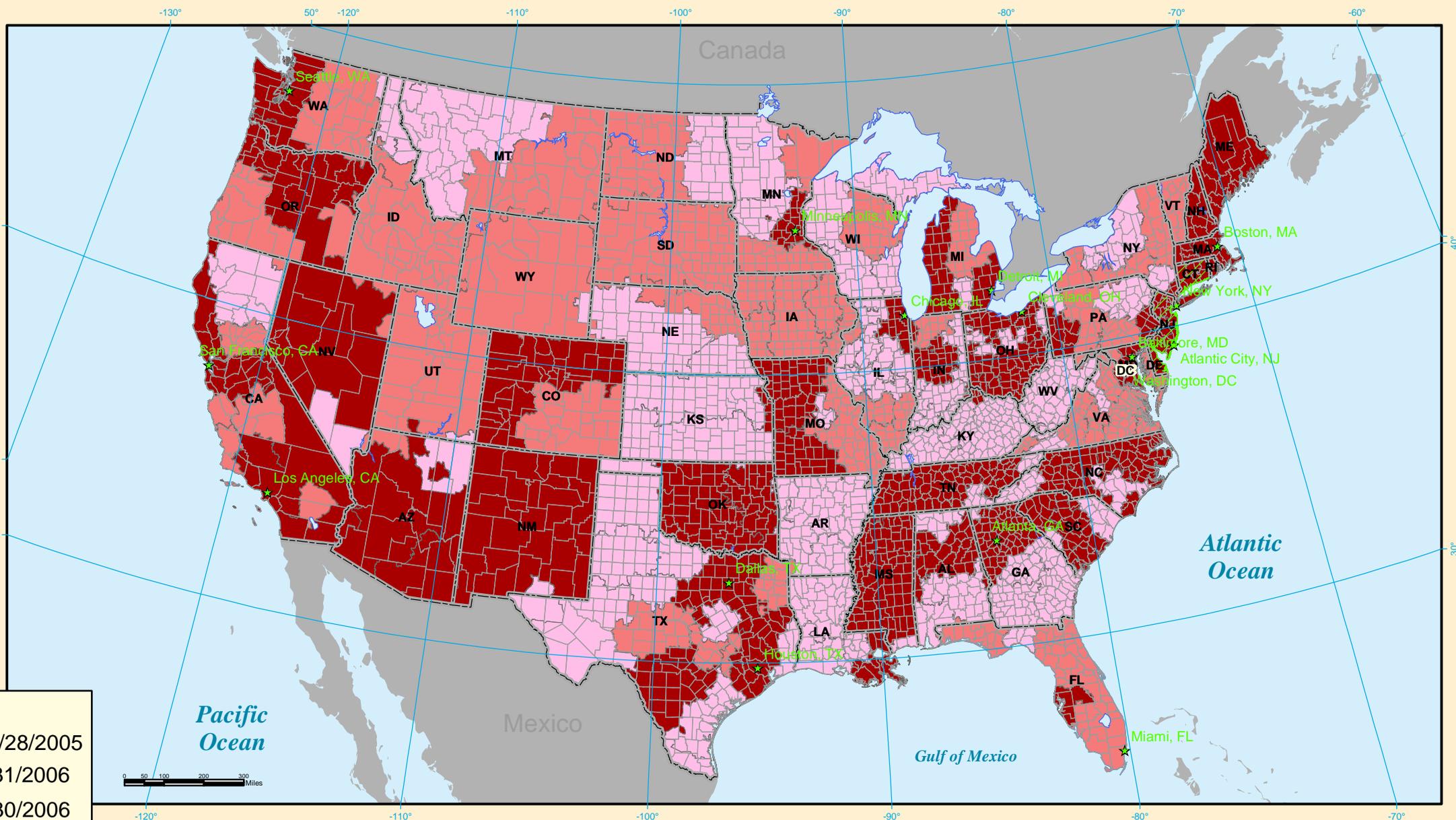


Puerto Rico



Legend

- Planned for 11/28/2005
- Planned for 3/31/2006
- Planned for 6/30/2006
- County Boundary
- or Top 20 MSAs
- Lakes



Intrado Major Market Rollout Schedule


Informed Response.™
 Intrado
 WOS GIS Operations Team
 Date: November 2005
 Data Source: Meridian, Geode, IPS, ESRI Data
 Created in ArcGIS 8 using ArcMap