

**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
)	
Nuvio Corporation)	
Petition for Extension and Limited Waiver)	

PETITION FOR EXTENSION OF TIME AND LIMITED WAIVER

Nuvio Corporation (“Nuvio”), 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 Nuvio pursuant to Commission Rules 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*, Nuvio will be unable to comply fully for all of its customers by the November 28, 2005 deadline. Accordingly, Nuvio requests a nine month extension of time to comply with those obligations, but may require additional time depending on the specifics of the VoIP E911 deployment as explained herein.³ Nuvio also requests expedited consideration of this Petition.

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.

³ Included as Exhibit A to this filing is map that illustrates Intrado’s planned VoIP E911 deployment schedule provided by Intrado to Nuvio. According to the deployment schedule, Intrado (cont’d)

I. DESCRIPTION OF THE PETITIONER

Nuvio, headquartered in Overland Park, Kansas, develops, licenses, and markets VoIP services to business, educational, consumer and government customers through a growing network of private-label partners. The largest portion of Nuvio's current customers is business users. In addition to consumer NuvioVoice products, Nuvio also offers nPBX, a complete IP-based Centrex application for businesses that replaces existing telephony infrastructure. Nuvio has provided a description of its service offerings to the Commission in its compliance report submitted on the same date as this Petition.⁴

Since the release of the *VoIP E911 Order*, Nuvio has taken a number of steps to comply with the Commission's new rules. Nuvio has substantially met the affirmative acknowledgment requirements set forth in 47 C.F.R. § 9.5(e).⁵ Nuvio has also taken significant steps to implement the E911 service requirements established in 47 C.F.R. § 9.5(b) and (c). Nuvio determined it did not have the resources to independently deploy full E911 service for all its VoIP customers by

expects to have nationwide coverage, subject to certain conditions, in place by June 2006. While this is seven months away, Nuvio is asking for nine months 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 Russell M. Blau and Ronald W. Del Sesto, Jr., Swidler Berlin LLP, WC Docket Nos. 04-36 and 05-196 (filed November 28, 2005) ("*Nuvio Compliance Report*")

⁵ Pursuant to Commission Public Notices, Nuvio has filed four status reports concerning the Company's efforts to notify its customers of the limitations associated with the 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, September 22, and October 25, 2005. The Company's October 25, 2005 status report informed the Commission that, as of October 25, 2005, Nuvio had obtained affirmative acknowledgement from approximately 91% of its subscriber base. As requested by the Commission, Nuvio will inform the Commission when the 100% threshold is met.

the Commission's deadline. Accordingly, it has contracted with a third-party vendor to deploy its VoIP E911 solution. That solution is discussed in detail below.

Despite its efforts, Nuvio will not be in compliance with the requirements of the *VoIP E911 Order* by the Commission's November 28, 2005 deadline. Nuvio expects to have a VoIP E911 solution in place for approximately 30% of its customers by mid-December 2005. Nuvio has address information for over 90% of its customers and currently has Master Street Address Guide ("MSAG") validated information for 11% of its customers but expects to have MSAG-validated address information from approximately 30% of its customers by mid-December 2005. Nuvio therefore requires additional time to implement an E911 solution for all of its customers. Nuvio, together with its vendor, is implementing an E911 solution that will comply with the *VoIP E911 Order*. Further, Nuvio is working with Intrado to put into place an interim solution for the remainder of its interconnected VoIP service customers that will allow for 911 call routing through the PSTN to the appropriate answering point using telephone numbers approved by the PSAP.

Based on its discussions with and commitments from its vendor, Nuvio currently estimates that it will require at least an additional nine months to make E911 service available in all areas in which it operates. Intrado, the underlying VoIP E911 network provider, has advised Nuvio that full E911 coverage will be in place by June 2006 for at least one Selective Router per county (where Selective Routers are utilized). However, Intrado has not yet advised Nuvio which counties have more than one Selective Router, so it is impossible for Nuvio to determine whether full coverage will be reached by June 2006, or whether certain customers may still be without E911 service in counties with two or more Selective Routers where Intrado has not interconnected with all available Selective Routers in those areas.

II. SPECIFIC WAIVERS REQUESTED

Nuvio 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.⁶
- 2) The requirement to route all 911 through the use of ANI and, if necessary, pseudo-ANI.⁷
- 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.⁸
- 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.⁹
- 5) To the extent necessary, Nuvio seeks limited waiver of Section 9.5(b)(1) of the rules to permit Nuvio to continue to market interconnected VoIP service and sign up new customers during the nine month period of additional time that Nuvio needs to comply with the requirements of Sections 9.5(b) and (c) of the rules.¹⁰

⁶ See 47 C.F.R. § 9.5(b)(2).

⁷ See 47 C.F.R. § 9.5(b)(3).

⁸ See 47 C.F.R. § 9.5(b)(4).

⁹ See 47 C.F.R. § 9.5(d).

¹⁰ The Enforcement Bureau's Public Notice explicitly provides that it expects "that such 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).

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.¹¹ To prevail, a petitioner must demonstrate that application of the challenged rule would be inequitable, unduly burdensome, or contrary to the public interest.¹²

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.¹³

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.¹⁴

¹¹ 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).

¹² *Wait Radio*, 418 F.2d at 1159.

¹³ 47 C.F.R. § 1.925(b)(3).

¹⁴ *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 P 10.

IV. PETITIONER MEETS THE STANDARD FOR GRANTING A WAIVER

A. Unusual Factual Circumstances Justify the Requested Waivers

Nuvio has long sought a means to provide E911 service to its customers. Because its service is offered over the public Internet, however, Nuvio cannot practicably limit the geographic locations from which its customers might use the service; therefore, a complete nationwide solution is required for E911 coverage. This poses a much greater challenge for Nuvio than is faced by traditional telecommunications carriers whose networks have a more defined geographic footprint. Even before the issuance of the *VoIP E911 Order*, Nuvio had investigated and determined that it would be logistically impossible for Nuvio to contact, negotiate, and contract with all the necessary parties to implement and manage a nationwide network-based E911 solution. Nuvio also contacted several third-party vendors offering limited geographic solutions and considered a number of different solutions offered by a variety of providers including Global Crossing Limited, Level 3 Communications, Inc., and TeleCommunication Systems, Inc. However, there were a variety of limitations associated with each service offering, and it quickly became apparent that none of these vendors had a complete solution.

After months of discussion, Nuvio entered into an agreement with Intrado, Inc. (“Intrado”) in October 2005. At that time, Nuvio expected to route 911 calls in Internet protocol to Intrado. However, approximately three weeks ago, Intrado informed Nuvio that Nuvio must interconnect with Intrado using point-to-point data circuits between the two companies’ data centers. Nuvio did not receive from Intrado the information necessary to provision these data circuits until last week. Apparently, the delay was due to Intrado determining the appropriate data center for interconnection with Nuvio. Standard industry practice is to provision private

lines within 60 days. Nuvio is working with its carrier to compress this schedule to allow inter-connection to occur in early December.

Intrado's service, as noted in the *Nuvio Compliance Report*, provides 911 service using direct call routing to PSAPs, including 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. However, the solution does not provide ANI and Registered Location information to all applicable answering points. 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 Nuvio's customers and nationwide service area. As detailed in Section I, however, Nuvio will not have 911 service in place until mid-December 2005 and anticipates, at that time, only about 30% of its customers will be covered by an E911 service that complies with the *VoIP E911 Order*. Intrado is working to deploy this solution in more MSAs, which will provide coverage to a greater proportion of Nuvio's customers.

Because of the lack of complete coverage by Intrado, Nuvio plans to initiate additional solutions. For its business customers, Nuvio plans to obtain a 911-capable number from one of its telecommunications vendors and associate the business address with that number. Businesses will only be permitted to have one registered address. Accordingly, a 911 call by a Nuvio business customer will be routed to the appropriate telecommunications vendor (*i.e.*, the ILEC or CLEC that provides the 911-capable number), which will be able to associate the ANI with the registered 911 address. Nuvio is also planning to set up media gateways to provide an E911 solution. Under this plan, Nuvio would order circuits from the ILEC or RBOC, establish connec-

tivity, and order telephone numbers. This service is dependent upon the RBOC or ILEC allowing different registered addresses for a single circuit. In the past RBOCs and ILECs have refused to allow such registration, but Nuvio believes they will cooperate. Nuvio would associate each telephone number with at least one address of record for a customer to facilitate E911. This solution is limited to customers that are located within historic geographic confines established by the RBOC, ILEC, and PSAP. This solution also requires a significant degree of manual processing, and changes to registered addresses could take up to 10 days to process.

One major complicating factor in deploying a VoIP E911 solution is both VoIP providers and solution providers, like Intrado, are dependent on the efforts of third parties to deploy an E911 solution, including RBOCs and PSAPs. Circumstances beyond Intrado's control impact Nuvio's ability to deploy an E911 solution to its customers. For example, 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,¹⁵ 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

¹⁵ 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).

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 Nuvio have the ability to resolve these issues.

The Commission also recognized in the *VoIP E911 Order* that the timeframe for requiring the deployment of an E911 solution was “aggressive.”¹⁶ In fact, deployment of an E911 solution for a new technology within 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.¹⁷ 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 issues 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 previously, 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.¹⁸ In this case, Nuvio has made good faith efforts to obtain an

¹⁶ *VoIP E911 Order*, ¶ 37.

¹⁷ 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).

¹⁸ *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 April 1, 2005 (“*Wireless E911 Tier III Second Waiver Order*”) at P 10.

E911 solution that complies fully with the *VoIP E911 Order*, and in fact has made substantial progress toward full compliance, but will not be in full compliance by November 28. Under these conditions, Nuvio respectfully submits that the unusual factual circumstances associated with the deployment of a VoIP E911 solution justify the limited relief Nuvio seeks in this Petition. In terms of acquiring registered location information from its customers, Nuvio had to provide Intrado with MSAG-validated addresses. While Nuvio has address information for approximately 90% of its customers, none of these addresses were MSAG-validated addresses. Nuvio had to wait for Intrado to make their MSAG-validation software available to Nuvio prior to collecting Registered Location information from its customers. Any addresses collected in advance of installing the software may have resulted in Nuvio having to go back to the customers for additional address information if the MSAG-validation software rejected the address information. This is a fairly common occurrence as MSAG addresses and postal addresses frequently do not match. Intrado did not provide the requisite MSAG validation software to Nuvio until November 26, 2005, despite repeated attempts by Nuvio to obtain such software after signing the contract with Intrado in October. In the two days since installing the requisite software, Nuvio has received address information that it could validate through the MSAG from 11% of its customers. Given that it has only been a couple of days since Nuvio implemented this process, Nuvio expects that it will obtain at least 30% MSAG-validated addresses by the time the Intrado solution is implemented by Nuvio.

B. Grant of an Extension of Time and Limited Waiver to Nuvio 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 Nuvio. Nuvio 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, Nuvio will not be able to provide full E911 service to all of its customers by the November 28 deadline. 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 Nuvio for its efforts to date. It could result in the suspension of service to a Nuvio's customers and prohibit Nuvio from accepting new customers. The result very well could be that Nuvio will be less able to comply with the *VoIP E911 Order*. Customers will remain without E911 service, as Nuvio will not have adequate resources to deploy a ubiquitous E911 solution, and Nuvio'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 Nuvio is necessary and is in the public interest.

1. Nuvio'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*, Nuvio has taken steps to achieve full compliance within a reasonable period. Grant of this Petition will give Nuvio the time and resources to carry out its compliance plan. As previously discussed, Nuvio has contracted with Intrado to provide an E911 solution to Nuvio. Pursuant to correspondence with Intrado, Nuvio understands that 93% the U.S. population is currently served by PSAPs operating off an E911 Selective Router. While the areas not served by a PSAP operating off an E911 Selective Router are not included within the *VoIP E911 Order* and are not required for compliance, Intrado is actively contacting these areas to determine technical options for VoIP E911 native call delivery. Also, Intrado is currently aware of four States and a

Commonwealth 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. Further, 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, that company currently provides 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, 2006.¹⁹ Nuvio has been advised by Intrado that Nuvio will have E911 coverage for approximately 30% of its customer base by approximately mid-December. Intrado has further advised Nuvio that it plans to deploy E911 services in at least one selective router per county as set out in Exhibit A. If Intrado is able to achieve the level of deployment by the end of the second quarter of 2006, and depending on the actual number of selective routers that Intrado connects to, most if not all of Nuvio's customers will have 911 service in conformity with the *VoIP E911 Order*. To reach that goal, Intrado still must arrange interconnection with thousands of PSAPs that are currently not covered. Nuvio will implement the Intrado provided solution throughout its network as soon as possible after Intrado makes it available.

¹⁹ 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.

2. The Relief Nuvio Seeks is in the Public Interest

In light of the circumstances described above, grant of a limited waiver and extension of time to Nuvio is in the public interest. Nuvio 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 and will meet in mid-December the requirements of 9.5(b) and (c) for approximately 30% of its customers. In addition, Nuvio is working closely with its vendors to ensure that all of its customers have full E911 access within a reasonable amount of time.

Nuvio is deploying interim solutions to ensure that customers will not be endangered by an extension of time for full E-911 compliance. In particular, as described earlier, Nuvio is in the process of assigning 911-capable telephone numbers to its business customers. Also, Intrado will route all 911 calls to PSAPs, although (at first) most calls will not be routed through dedicated connections to selective routers and will not be capable of ALI transmission.

By demanding full compliance with the *VoIP E911 Order* by November 28, the Commission will make it more difficult for Nuvio to come into full compliance. Strict adherence to the VoIP E911 Order could require Nuvio to discontinue its services to some customers and to cease accepting new customers.²⁰ These actions would deprive existing customers of access to Nuvio's VoIP services and destroy Nuvio's relationships with those customers. In addition, the ability of Nuvio to attract new customers would be severely hampered. The loss of current customers and

²⁰ 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.

the inability to accept new customers will deprive Nuvio of the ability to maintain or expand its user base and revenues. This would cause Nuvio extreme economic hardship. More important for purposes of this Petition, the loss of those revenues would limit Nuvio's ability to pay for the deployment of E911 service and make it less likely that Nuvio 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, Nuvio 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. Nuvio is not requesting an exemption from or indefinite waiver of the rules. Rather, Nuvio 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 situation here is no different. Nuvio'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, Nuvio respectfully submits that grant of this Petition for extension of time and limited waiver serves the public interest.

Respectfully submitted,

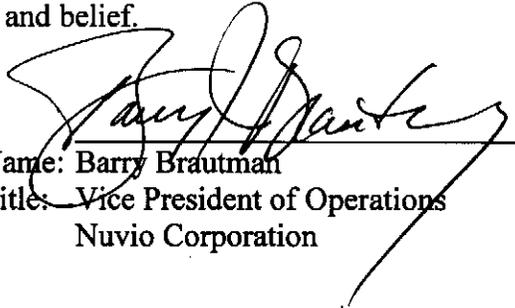
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Filed: November 28, 2005

I, Barry Brautman, state that I am Vice President of Operations of Nuvio Corporation; 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.



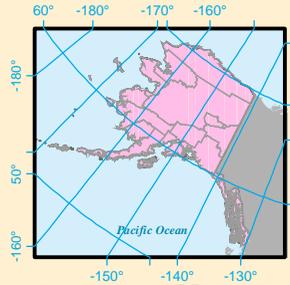
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Name: Barry Brautman
Title: Vice President of Operations
Nuvio Corporation

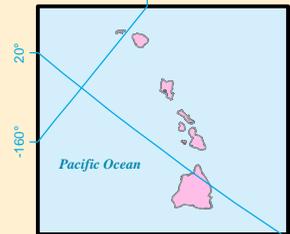
Exhibit A

Intrado Major Market VoIP E911 Rollout Map

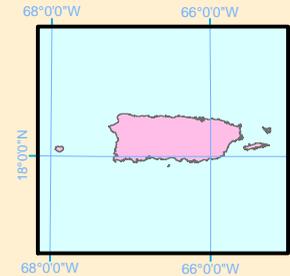
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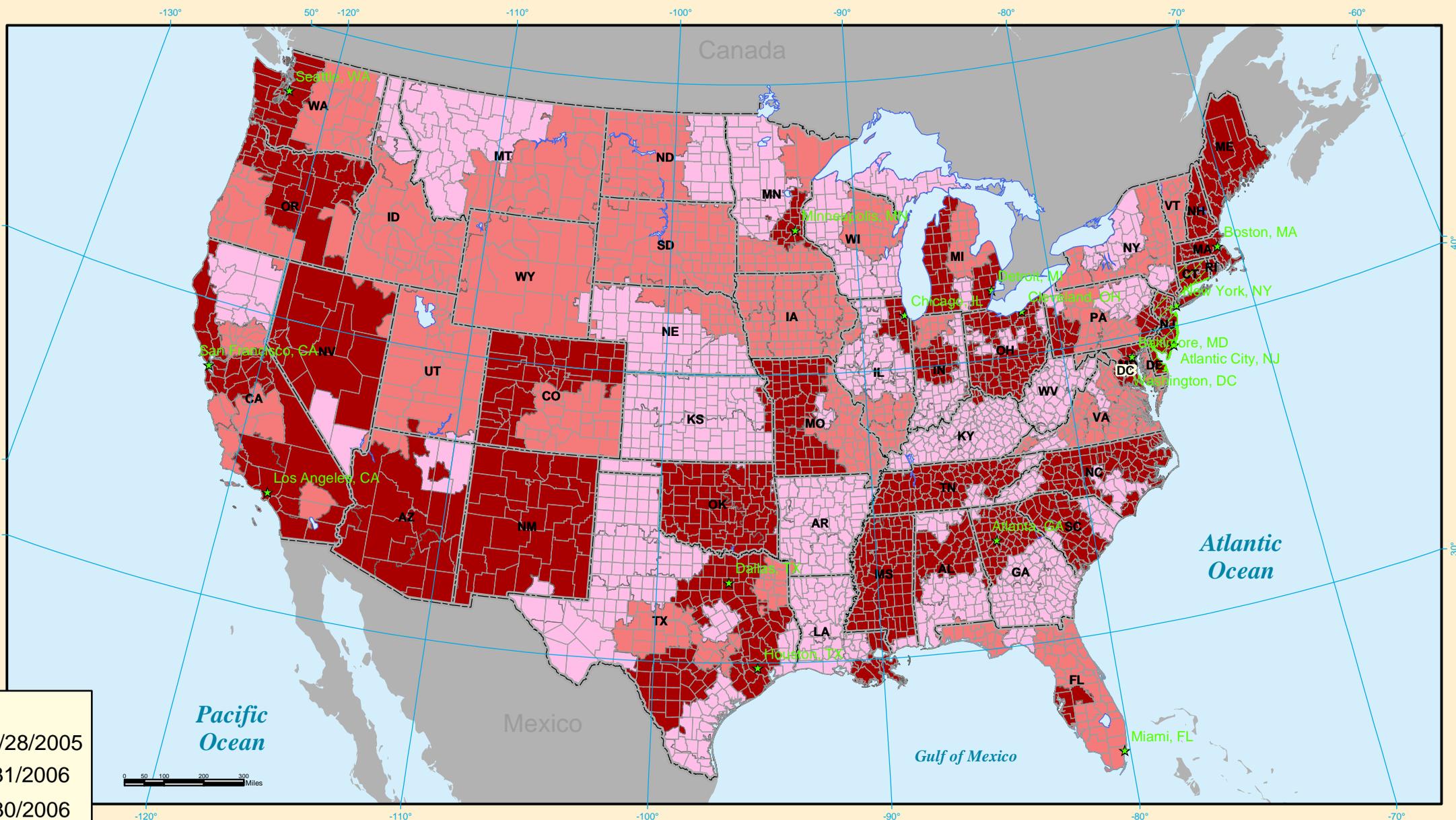


Puerto Rico



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

Albers Projection
 Central Meridian: -96
 1st Std Parallel: 20
 2nd Std Parallel: 40
 Latitude of Origin: 40

Intrado™
Informed Response.™

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