

**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
)	
i2 Telecom International, Inc.)	
Petition for Extension and Limited Waiver)	

PETITION FOR EXTENSION OF TIME AND LIMITED WAIVER

i2 Telecom International, Inc. (“i2”), 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 i2 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*, i2 will be unable to comply fully for all of its customers by the November 28, 2005 deadline. Accordingly, i2 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 i2 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, 47 C.F.R. §§ 9.5, implementing the *VoIP E911 Order* are scheduled to take effect on November 28, 2005.

³ Included as Exhibit A to this filing is a map that illustrates Intrado’s planned VoIP E911 deployment schedule provided by Intrado to i2. According to the deployment schedule, Intrado expects to have nationwide coverage, subject to certain conditions, in place by June 2006. While this is seven months away, i2 is asking for nine months based on the delays the Company has experienced in the run up to the November 28, 2005 deadline.

I. DESCRIPTION OF THE PETITIONER

i2, headquartered in Atlanta, Georgia, provides international and domestic long distance calling services to subscribers using VoIP technology. With operations based in Atlanta, Georgia and Redwood City, California, i2's proprietary network uses the Internet to deliver high-quality phone calls for a fraction of the cost of traditional telecommunications service providers. Specifically, i2's VoiceStick and InternetTalker access devices enable any telephone or business phone system (PBX) to access i2's global network and advanced routing technologies to complete calls over the Internet.

i2's VoIP service is portable. If an i2 customer has access to broadband Internet access, the customer can use the service anywhere in the United States or the world. Customers may obtain their broadband Internet access from i2, but they are not required to do so. i2's VoIP service also allows customers located in one geographic area to use telephone numbers that are associated with another area. i2's interconnected VoIP service is different than most other providers in that i2's service is used by approximately 99% of its customers as a software application. i2's customers either download the software from the Internet or purchase "memory sticks" – a portable storage device that connects to the Universal Service Bus ("USB") port on personal computers – that contains i2's "softclient." Accordingly, i2's service is much more portable than VoIP services tied to hardware devices.

i2 has provided a detailed description of its service offerings, with specific emphasis on its VoIP E911 deployment, in its compliance report submitted on the same date as this Petition.⁴ Pursuant to the definitions adopted in the *VoIP E911 Order*, i2 is a provider of interconnected

⁴ See Letter to Marlene H. Dortch, Secretary, FCC 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) ("*i2 Compliance Report*").

Voice over Internet Protocol (“VoIP”) services, as the company: (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

i2 has taken a number of steps to comply with the Commission’s new rules. i2 has substantially met the affirmative acknowledgment requirements set forth in 47 C.F.R. § 9.5(e).⁶ i2 also has designed a process that will obtain the Registered Location information from all of its interconnected VoIP customers by requiring them to update their Registered Location information via an online account manager feature. Finally, i2 has also taken significant steps to implement the E911 service requirements established in 47 C.F.R. § 9.5 (b) and (c). i2 determined that it did not have the resources to independently deploy full E911 service for all its VoIP customers by 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, i2 will not be in full compliance with the requirements of the *VoIP E911 Order* by the Commission’s November 28, 2005 deadline. i2 expects to have a VoIP E911 solution in place by mid-December 2005 for its customers with Registered Location information in Intrado’s service footprint and expects to have registered location information for all of its customers as soon as the customers updates their Registered Location information via the online

⁵ See 47 C.F.R. § 9.3.

⁶ i2 has filed three status reports addressing the Company’s efforts to notify its customers of the limitations associated with its VoIP 911 service and to obtain affirmative acknowledgments from those subscribers stating that they understand those limitations. Those reports were filed in WC Docket No. 04-36 on August 10, September 1, and September 22, 2005. The Company’s September 22, 2005 report informed the Commission that, as of September 20, 2005, i2 had obtained affirmative acknowledgements from approximately 98% of its subscriber base. As requested by the Commission, i2 will inform the Commission when the 100% threshold is met.

account manager feature. i2 therefore requires additional time to implement an E911 solution for all of its customers. i2, together with its vendor, is implementing an E911 solution that will comply with the *VoIP E911 Order*. Further, i2 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 vendors, i2 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 i2 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 i2 which counties have more than one Selective Router, so it is impossible for i2 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

i2 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 Wire-line 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.⁷
- 2) The requirement to route all 911 through the use of ANI and, if necessary, pseudo-ANI.⁸

⁷ See 47 C.F.R § 9.5(b)(2).

⁸ See 47 C.F.R. § 9.5(b)(3).

- 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.⁹
- 4) To the extent necessary, i2 seeks limited waiver of Section 9.5(b)(1) of the rules to permit i2 to continue to market interconnected VoIP service and sign up new customers during the nine month period of additional time that i2 needs to comply with the requirements of Sections 9.5(b) and (c) of the rules.¹⁰

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. It provides that the Commission may grant a request for waiver if:

⁹ See 47 C.F.R. § 9.5(b)(4).

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).

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

¹² *Wait Radio*, 418 F.2d at 1159.

(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

IV. PETITIONER MEETS THE STANDARD FOR GRANTING A WAIVER

A. Unusual Factual Circumstances Justify the Requested Waivers

i2 has long sought a means to provide E911 service to its VoIP customers. Because the Company's VoIP service is offered over the public Internet, however, i2 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 i2 than is faced by traditional telecommunications carriers whose networks have a more defined geographic footprint. Even before the *VoIP E911 Order* was issued, i2 determined that it would be impossible for it to contact, negotiate, and contract with all with all the parties, including ILECs, PSAPs, and other third-party vendors with access to the underlying Wireline E911 Network, necessary to implement and manage a nationwide E911 solution.

In an effort to comply with the *VoIP E911 Order's* 120-day requirements, i2 contacted several vendors that offered solutions that would comply with the Commission's VoIP E911

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

rules. Specifically, i2 considered solutions offered by TCS, Intrado, and Level 3. However, each of the solutions offered by these third-parties had limitations. For example, two providers were offering solution that worked only within their service footprint, which did not fully overlap with i2's service area, and did not work with non-local telephone numbers. Another provider did not offer call routing services for 911 calls, but only provided database updates and verification services.

After months of discussion with these providers concerning their E911 solutions, i2 contracted with Intrado in September 2005, to provide an E911 solution by the November 28, 2005 deadline. To use the Intrado solution, i2 was required to purchase the dedicated data circuits from Intrado to connect its network to Intrado's facilities. While i2 now has the necessary circuits in place with Intrado to implement the Intrado solution, the circuits were delayed until November 22, 2005, due to various ordering problems that typically arise when installing private line circuits and due to the demands placed on Intrado by numerous parties seeking to take advantage of their service. Under normal circumstances these delays would have been inconsequential, but due to the tight timeframe established by the *VoIP E911 Order*, every delay became extremely problematic. Currently, i2 is testing the circuits and debugging related E911 software applications, which typically is a three to six month process requiring thousands of hours to complete considering the complexity but which Intrado and i2 are working to complete in under 30 days. As a result, i2 expects to implement the Intrado VoIP E911 solution by mid-December 2005.

The solution developed by Intrado, Verso and i2 provides a true E911 solution for i2. Intrado handles, for example, all aspects of the VoIP 911 call delivery, Master Street Address Guide ("MSAG") Address Validation, ESQK management, geocoding, and other real-time

provisioning and call routing. Intrado also includes a call delivery component to ensure the 911 call reaches the appropriate Selective Router and PSAP. i2 must only provide an ongoing delivery of address (i.e., registered location information) and telephone number information to Intrado via a real-time interface, as well as connectivity to the Intrado network to enable live 911 call delivery.

i2 via Intrado will be able to provide service in selected areas covered by MSAGs in Arizona, California, Colorado, Delaware, Florida, Indiana, Massachusetts, Maryland, Maine, and Minnesota by mid-December 2005.. In discussions with Intrado, however, i2 has determined that Intrado's service will route 911 calls using the dedicated Wireline E911 Network in certain markets, but will not comply with the *VoIP E911 Order* in many markets in which i2 operates by the Commission's deadline. Although i2 and Intrado are currently installing the solution to reach as many customers and service areas as possible as quickly as possible, Intrado reports that i2 and other VoIP providers have access to only 154 E911 Selective Routers as of November 28, 2005. i2 is attaching a Major Market Deployment Map and the VoIP Deployment Plan (Exhibit A) which reflect the major market deployment schedules estimated by Intrado. Although i2 and Intrado are working on deploying E911 service nationwide as quickly as possible, installation is being affected, by delivery dates, testing, and systems interoperability testing.

Further, the Company has undertaken other efforts to meet the Commission's VoIP E911 requirements. For example, i2 has worked closely with its switching and E911 provider throughout all phases of installation and testing; i2 has installed all necessary circuits to interconnect with Intrado in order to provide the voice interconnect; and i2 is currently designing interface software which will allow customers to update location information along with providing for the ability for automatic tracking of location information for future update requirements. i2 has also

expended a significant amount of its limited resources to deploy E911 through testing, planning and status meetings with all parties involved, while completing and processing the local and state filings necessary for interconnect with the assistance of Intrado in various states.

Intrado's service provides 911 service using direct call routing to PSAPs, including the use of 10-digit telephone numbers approved by the relevant PSAP where direct connections to Selective Routers have not yet been established. 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 i2's customers and nationwide service area. Given the lack of complete coverage by Intrado's VoIP E911 network solution, it is not a complete solution. As detailed in Section I, however, i2 will not have 911 service in place until mid-December 2005. As explained in greater detail below, due to the portable nature of i2's VoIP service, it cannot accurately predict how many customers will be covered by Intrado's VoIP E911 service. Intrado is working to deploy this solution in more MSAs, which will provide coverage to a greater proportion of i2's customers.

One major complicating factor in deploying a VoIP E911 solution is that 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 i2'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,¹⁵ the lack of the appointment of an interim Routing Number Authority makes 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 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 enjoy legal protection that insulate them from liability should emergency calls be mishandled. Neither Intrado nor i2 currently have the ability to resolve these issues.

The Commission also recognized in the *VoIP E-911 Order* that the timeframe for requiring the deployment of an E911 solution was “aggressive.”¹⁶ In fact, deployment of an E-911 solution for a new technology within 120-days is without precedent. VoIP providers, third-party solution providers, VoIP Positioning Companies, state and local E-911 officials, and RBOCs are faced with unique issues. In addition, there is no standard in place for the delivery of VoIP E911 calls.¹⁷ Further, the RBOCs have demonstrated different levels of cooperation in deploying a VoIP E911 solution and have adopted different implementation procedures. The 120-day implementation timeframe has not allowed enough time for the industry to resolve all of these issues in

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).

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).

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 establish 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, i2 has made good faith efforts to obtain an 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, i2 respectfully submits that the unusual factual circumstances associated with the deployment of a VoIP E911 solution justify the limited relief i2 seeks in this Petition.

B. Grant of an Extension of Time and Limited Waiver to i2 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* would be inconsistent with the public interest with respect to i2. i2 has made good faith efforts to comply with the requirements and has made substantial 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, i2 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 that fact or further the Commission's goal of providing E911 to all consumers, but will only punish i2 for its efforts to date. It could result in the suspension of service to i2's customers and prohibit i2 from accepting new customers. The result very well could be

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.

that i2 will be less able ultimately to comply with the *VoIP E911 Order*. Customers will remain without E911 service, as i2 will not have adequate resources to deploy a ubiquitous E911 solution, and i2's ability to compete in the VoIP market will be weakened. Such a result would not serve 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 i2 is necessary and is in the public interest.

1. i2'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*, i2 has taken steps to achieve full compliance within a reasonable period. Grant of this Petition will give i2 the time and resources to carry out its compliance plan. As discussed, i2 has contracted with Intrado to provide an E911 solution to i2. Pursuant to correspondence with Intrado, i2 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 i2 cannot accurately calculate how many customers will be covered by the Intrado solution due to the fact that i2's VoIP service is entirely software based for virtually all of its customers. Thus, the percentage of customers covered by the Intrado solution will constantly change based on the locations where i2 customers log on to use the service. However, i2 is building a system that will allow customers to use Intrado's VoIP E911 solution when they provide a registered location that is within the Intrado VoIP E911 footprint. i2 will also require customers to provide location information in order to use of the service every time their Internet protocol address changes. For customers that fall outside of the VoIP E911 footprint, i2 will deliver calls to Intrado for routing via the PSTN using a 10-digit telephone number. Intrado has further advised i2 that it plans to deploy E911 services in at least one selective router per county as set out in Exhibit A. To reach that goal Intrado still must arrange for interconnection with thousands of PSAPs that are currently not covered. i2 will implement the Intrado-provided solution throughout its network as soon as possible after Intrado makes it available.

2. The Relief i2 Seeks is in the Public Interest

In light of the circumstances described above, grant of a limited waiver and extension of time to i2 is in the public interest. i2 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 98% of its customers and will meet in mid-December the requirements of 9.5(b) and (c) for its customers that provide

¹⁹ Note that the market deployment map represent major markets where Intrado has connectivity to at least one Selective Router, ALI steering and the ability to populate ALI.

a Registered Location within Intrado's VoIP E911 service footprint. In addition, i2 is working closely with its vendors to ensure that all of i2's customers have full E911 access within a reasonable amount of time. Also, as described above, i2 will provide via Intrado an interim solution that will allow most customers' 911 calls to reach the correct PSAP even if full E911 capabilities are not available.

By demanding full compliance with the *VoIP E911 Order* by November 28, the Commission will make it more difficult for i2 to come into full compliance. Strict adherence to the *VoIP E911 Order* could require i2 to discontinue its services to some customers and to cease accepting new customers.²⁰ These actions would deprive existing customers of access to i2's VoIP services and destroy i2's relationships with those customers. In addition, the ability of i2 to attract new customers would be severely hampered. The loss of current customers and the inability to accept new customers will deprive i2 of the ability to maintain or expand its user base and revenues. This would cause i2 extreme economic hardship. More important for purposes of this Petition, the loss of those revenues would limit i2's ability to pay for the deployment of E911 service and make it less likely that i2 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*

i2 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

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 serve 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.

that customers of interconnected VoIP providers have access to emergency services. i2 is not requesting an exemption from or indefinite waiver of the rules. Rather, i2 merely seeks 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. i2’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, i2 respectfully submits that grant of this Petition for extension of time and limited waiver serves the public interest.

Respectfully submitted,

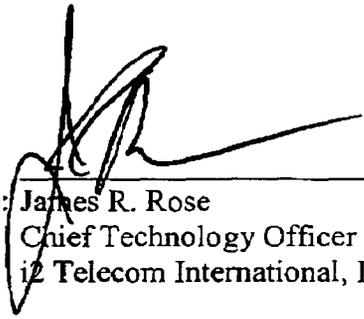
Handwritten signature of Russell M. Blau in cursive script, followed by the initials "RS" to the right.

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Counsel for i2 Telecom International, Inc.

Filed: November 28, 2005

I, James Rose, state that I am Chief Technology Officer, of i2 Telecom International, Inc.; that I am authorized to submit the forgoing *Petition for Extension of Time and Limited Waiver* ("*Petition*") on behalf of i2 Telecom International, Inc.; that the *Petition* was prepared under my direction and supervision; and I declare under penalty of perjury that the *Petition* is true and correct to the best of my knowledge, information, and belief.

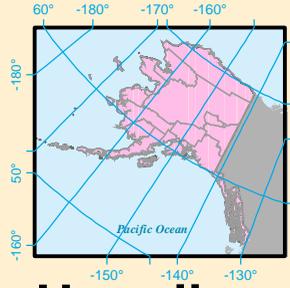


Name: James R. Rose
Title: Chief Technology Officer
i2 Telecom International, Inc.

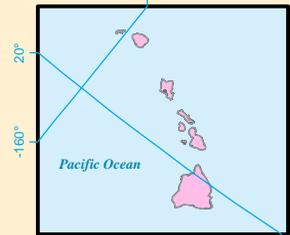
Exhibit A

Intrado Major Market VoIP E911 Rollout Map

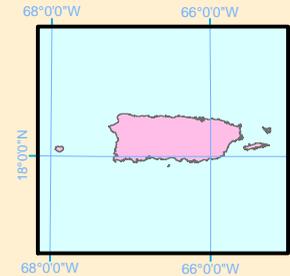
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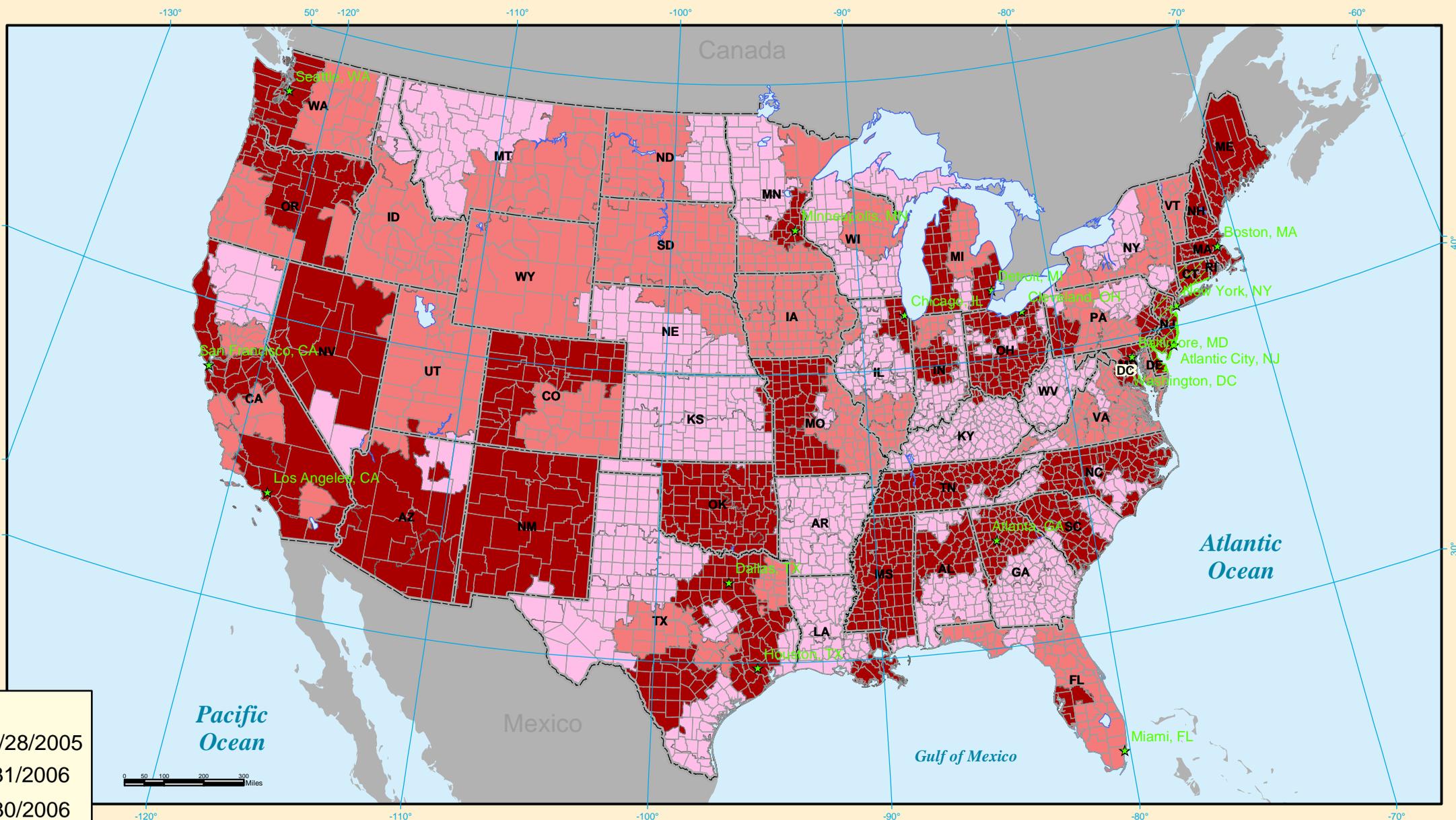


Puerto Rico



Legend

- Planned for 11/28/2005
- Planned for 3/31/2006
- Planned for 6/30/2006
- County Boundary
- 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