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November 28, 2005

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW – Lobby Level  
Washington, D.C. 20554

Re: **Compliance Letter** -- E911 Requirements for IP-Enabled Service Providers,  
WC Docket No. 05-196

Dear Ms. Dortch:

On behalf of AT&T, Inc. (AT&T), I am submitting the attached reports regarding AT&T's compliance with the Commission's 911 requirements for interconnected Voice over Internet Protocol services, as required by 47 C.F.R. § 9.5(f). The first report covers AT&T's Hosted IP Communications Service and the second report covers AT&T's CallVantage® Service. If you have any questions or need additional information, please do not hesitate to contact me.

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

*/s/ Jack Zinman*

Jack Zinman

Attachments

cc: Byron McCoy  
Kathy Berthot  
Janice Myles

**AT&T, Inc.**  
**Compliance Letter (HIPCS) – November 28, 2005**  
**WC Docket No. 05-196**

Pursuant to section 9.5(f) of the Commission's rules,<sup>1</sup> AT&T, Inc (AT&T) submits this report detailing its compliance with the Commission's VoIP 911 rules regarding AT&T's business VoIP service known as PremierSERV Hosted IP Communications Service (HIPCS).<sup>2</sup> In response to the information requested in the Enforcement Bureau's *VoIP 911 Compliance Letter Public Notice*, AT&T provides the following information:<sup>3</sup>

- (1) **911 Solution**: This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the VoIP 911 Order.

AT&T is able to provide 911 service in compliance with the Commission's VoIP 911 rules for 100 percent of its HIPCS subscribers.

**Further, the detailed description of the technical solution should include the following components:**

- (a) **911 Routing Information/Connectivity to Wireline E911 Network**: A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the VoIP 911 Order, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized." If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.

Before initiating HIPCS service to a subscriber's registered locations (see section 2 below), AT&T provisions the necessary trunking to the appropriate selective routers and makes arrangements with the appropriate Public Safety Answering Points (PSAPs) and/or other public safety authorities for the delivery of VoIP 911 traffic. As of the close of business

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<sup>1</sup> 47 C.F.R. § 9.5(f).

<sup>2</sup> HIPCS is actually provided to subscribers by AT&T affiliates; for simplicity, however, we refer to HIPCS as being provided by AT&T in this letter.

<sup>3</sup> *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket No. 05-196, Public Notice, DA 05-2945 (released Nov. 7, 2005) (*VoIP 911 Compliance Letter Public Notice*).

on November 27, 2005, AT&T had established connectivity to 99 selective routers for the provision of 911 service associated with HIPCS. When a 911 call is placed using HIPCS, the call is transmitted utilizing the Wireline E911 Network in a manner consistent with paragraph 42 of the Commission's *VoIP 911 Order*.<sup>4</sup>

- (b) **Transmission of ANI and Registered Location Information: A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.**

AT&T transmits the appropriate automatic number identification (ANI) and registered location for HIPCS 911 calls via the Wireline E911 Network to all answering points that are capable of receiving this information.

As discussed below in section 2, a HIPCS subscriber is required to identify the registered locations where HIPCS will be used. HIPCS subscribers are also required to designate one telephone number for each registered location that will be used as the ANI for any 911 call that may originate from that location. AT&T programs the ANI into the HIPCS network and correlates an Emergency Services Routing Number (ESRN) to the subscriber's registered location. AT&T also programs each ANI and its associated registered location into the appropriate local E911 database, where it can be retrieved by a PSAP as automatic location identification (ALI) data.

When a HIPCS subscriber's end user calls 911 from his or her IP phone,<sup>5</sup> the call is routed to the HIPCS network. The HIPCS network uses the ESRN associated with the subscriber's registered location to choose a dedicated trunk to the selective router that serves that location. The

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<sup>4</sup> *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking, FCC 05-116 (released June 3, 2005) (*VoIP 911 Order*).

<sup>5</sup> HIPCS subscribers have the option of using an IP phone or a standard telephone connected to a terminal adapter (TA). The routing of a 911 call is not affected by whether the subscriber chooses an IP phone or a TA.

HIPCS network then delivers the 911 call (including ANI) to the selective router. The selective router uses the ANI to route the 911 call to the PSAP that serves the subscriber's registered location and transmits the associated ANI to the PSAP, as required by the Commission's rules. The PSAP (if ALI capable) can use the ANI to query the ALI database to retrieve the ALI record for the subscriber's registered location, which AT&T loaded into the ALI database when the service was initially provisioned.<sup>6</sup>

AT&T estimates that 100 percent of the PSAPs that serve HIPCS subscribers are capable of receiving and processing the ANI and ALI data associated with those HIPCS subscribers. AT&T also estimates that 100 percent of its HIPCS subscribers are served by PSAPs that are capable of receiving and processing ANI and ALI data associated with those HIPCS subscribers.

- (c) **911 Coverage:** To the extent a provider has not achieved full 911 compliance with the requirements of the VoIP 911 Order in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

Not applicable. AT&T has achieved full 911 compliance with the requirements of the *VoIP 911 Order* for its HIPCS subscribers.

- (2) **Obtaining Initial Registered Location Information:** A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.

AT&T has obtained a registered location for 100 percent of its HIPCS subscribers. Before entering into an agreement with AT&T for HIPCS, a HIPCS subscriber is required to identify the registered locations where it seeks service (e.g., office building(s) located in one or more cities). AT&T representatives will visit these locations to gather information to be used in evaluating their suitability for HIPCS. A HIPCS design plan is then developed to provision HIPCS at these locations. After the assessment is completed, a list of the registered locations where HIPCS will be provided is incorporated into the written service agreement

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<sup>6</sup> Because the HIPCS 911 solution uses existing PSTN 911 processes to transmit ANI and ALI, any PSAP capable of receiving ANI and ALI for a 911 call that originated from a PSTN-based subscriber would also be capable of receiving ANI and ALI for a 911 call that originated from a HIPCS subscriber.

between AT&T and the subscriber. AT&T then provisions HIPCS service, including 911 service, to each of those locations.

- (3) **Obtaining Updated Registered Location Information:** A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.

See section 4 below.

- (4) **Technical Solution for Nomadic Subscribers:** A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

Due to the security features built into HIPCS (e.g., a HIPCS firewall), HIPCS interconnected VoIP service can only be accessed if the end user connects in a secure fashion to the LAN at the subscriber's registered location (e.g., with a direct physical connection to the LAN). A subscriber cannot access HIPCS interconnected VoIP service using only an ordinary broadband Internet access connection to the "public" Internet, like those used for typical, mass market bring-your-own-broadband VoIP services.

A HIPCS subscriber's end user can, however, take his or her IP phone (or TA) from an office in one city to an office in another city and still have the capability to place a 911 call, as long as both office locations have been provisioned for HIPCS and the subscriber has registered the locations with AT&T. When the end user connects the IP phone at the registered location in the new city, the IP phone registers with a proxy device serving that registered location.<sup>7</sup> Registration with the proxy device enables 911 calls from the IP phone to utilize the ANI and ALI associated with the registered location in the new city to route the call to the appropriate PSAP.<sup>8</sup> Thus, because the HIPCS network automatically routes any

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<sup>7</sup> HIPCS allows subscribers to subdivide their registered locations into different tenant groups for administrative purposes. If the end user has moved between registered locations in the same tenant group, the HIPCS network will automatically recognize the IP phone. If the end user has moved between registered locations in different tenant groups, the IP phone will not function until the subscriber's network administrator has registered the IP phone in the new tenant group.

<sup>8</sup> If a HIPCS subscriber physically builds-out or extends its IP network to a new non-registered location for HIPCS without AT&T's knowledge, limited 911 service with ANI capability would be available at that new location but 911 service with accurate ALI capability may not be available at the new location until the subscriber makes arrangements with AT&T for such service. Specifically, consistent with section 9.5(d)(2) of the Commission's rules, HIPCS provides the subscriber (e.g., the subscriber's network administrator) with the ability to use a HIPCS telephone set to notify AT&T that an end user's IP phone is being moved to the new location. Once AT&T is notified of the new location, AT&T will provision updated records in the HIPCS network and the local E911 database for the new location of the IP phone in a timely manner, which will enable the appropriate ANI and ALI to

911 calls from the IP phone to the appropriate PSAP in the new city, there is no need for the end user to manually update his or her location information when moving the IP phone between registered HIPCS locations.

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be associated with the IP phone at the new location and will ensure that 911 calls from the IP phone are routed to the appropriate PSAP.

**AT&T, Inc.**  
**Compliance Letter (AT&T CallVantage® Service)**  
**Docket No. 05-196**

Pursuant to Section 9.5(f) of the Commission's Rules,<sup>9</sup> and the Commission's June 3, 2005 *VoIP 911 Order*,<sup>10</sup> AT&T, Inc. hereby submits the following report detailing its compliance for AT&T CallVantage® Service with the Commission's VoIP 911 rules.<sup>11</sup>

**1. 911 Solution: This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*.**

AT&T is currently able to provide 911 service in full compliance with the rules established in the *VoIP 911 Order* for the substantial majority of its interconnected AT&T CallVantage Service VoIP customers.<sup>12</sup> Approximately 65% of AT&T CallVantage customers have Enhanced 911 (E911) and less than 1% have Basic 911 (911). This latter category is limited to those areas where only Basic 911 is offered by the public safety answering point. The remaining 35% of customers are provided with Alternative 911 (A911) and will continue to be served with A911 on a grandfathered basis.<sup>13</sup> Because AT&T has stopped taking orders for new service in those areas not yet VoIP E911-enabled, only grandfathered customers are included in the estimate for customers with less than full compliance.

**1. (Cont'd.) Further, the detailed description of the technical solution should include the following components:**

**1A. 911 Routing Information/Connectivity to Wireline E911 Network: A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized." If the provider is not**

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<sup>9</sup> 47 C.F.R. § 9.5(f).

<sup>10</sup> *IP-Enabled Services*, WC Docket No. 04-36, *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd. 10245, ¶ 50 (2005) ("*VoIP 911 Order*").

<sup>11</sup> AT&T CallVantage Service is actually provided to subscribers by an AT&T affiliate; for simplicity, however, we refer to AT&T CallVantage as being provided by AT&T in this letter.

<sup>12</sup> Some AT&T CallVantage Service customers have more than one telephone number associated with their service. Although this letter refers to subscribers or customers, customer data are computed on a telephone number basis.

<sup>13</sup> See Letter from Robert W. Quinn, Jr., AT&T, to Marlene H. Dortch, Secretary, FCC, *IP-Enabled Services*, WC Docket No. 04-36, *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196 (Oct. 7, 2005) ("*AT&T October 7, 2005 ex parte*").

**transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.**

AT&T estimates that as of November 28, 2005, it is interconnected, directly or indirectly, to 145 Selective Routers. This is less than full 100% connectivity because AT&T is not yet capable of receiving and routing AT&T CallVantage Service 911 calls in certain areas outside of the AT&T CLEC footprint, where it is dependent on third-party vendors. AT&T will continue to extend the coverage for E911 service, either directly or through its vendors.

On October 7, 2005, AT&T filed a compliance plan with the FCC detailing the steps that it would undertake in the event that it was not able to provide E911 service to 100% of its customer base. As part of that filing, AT&T committed to stop accepting new customers in areas where it cannot provide E911 service, make voluntary contributions to public safety organizations for grandfathered customers until AT&T can provide those customers with E911 connectivity, and to implement any new commercially reasonable technological solutions to expand its E911 footprint throughout the country.

The reasons for less than full connectivity fall into two overlapping categories. First, AT&T has a subset of customers (24.7% of its total subscriber base) who have telephone numbers that do not match the underlying rate center ("out-of-rate center") and for whom dynamic 911 call routing and ALI database updating capabilities, dependent on pseudo-ANI, must be put in place to route the call to the correct PSAP. Second, approximately 10.1% of AT&T CallVantage subscribers are located in LATAs for which AT&T has not been able to deploy E911 connectivity. These areas are generally outside of AT&T's local CLEC footprint ("out-of-footprint") and AT&T is consequently relying upon third-party vendors for E911 connectivity.

On November 28, 2005, AT&T will have the capability to properly route out-of-rate center / out-of-footprint subscribers' E911 calls for approximately 4% of its November 28<sup>th</sup> subscriber base. AT&T expects to be able to properly route E911 calls of the remaining out-of-rate center / out-of-footprint subscribers by third quarter 2006.<sup>14</sup> AT&T expects to make significant progress in E911 deployment for its out-of-rate center / out-of-footprint subscribers over the next three months. Roll-out updates will be provided in monthly reports AT&T has already committed to provide to the FCC in AT&T's October 7, 2005 *ex parte*.

Once the above two steps are complete for out-of-area and out-of-footprint customers, based on current information, AT&T expects to be providing E911 service to approximately 97% of its November 28 customer base but will still have approximately 3% of its November 28 subscribers who live in areas where AT&T will not at that time

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<sup>14</sup> Depending on the capabilities of PSAPs (and any necessary understandings / waivers), there may be instances that the call is properly routed, but ANI and Registered Location information may not be transmitted.

be capable of providing an E911 solution. For this latter group of subscribers, which includes only grandfathered customers, we will continue to provide an A911 solution and will implement any new commercially reasonable technological solution that makes it possible to provide those customers with E911 consistent with the commitment made in the October 7, 2005 compliance filing.

**1B. Transmission of ANI and Registered Location Information: A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.**

AT&T is currently transmitting ANI and Registered Location information on all AT&T CallVantage calls for E911 customers. AT&T estimates that it is transmitting ANI and Registered Location information for approximately 65% of its customers, and to approximately 2,184 answering points. However, AT&T does not know whether all the answering points to which this information is transmitted for its AT&T CallVantage customer base are capable of receiving and processing it. As a CLEC, AT&T does not have exact information on nationwide PSAP capabilities because AT&T hands the 911 call off at the Selective Router, rather than connecting directly to the PSAPs.

**1C. 911 Coverage: To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.**

Attachment 1 to this letter provides a listing, by LATA and MSA, where AT&T has achieved a measure of compliance and those in which it has not.<sup>15</sup> As shown in Attachment 1, AT&T is currently in partial compliance in 54 out of 188 LATAs in which AT&T CallVantage currently has customers, or 29% of the LATAs in which AT&T CallVantage currently has customers. AT&T has achieved a measure of compliance in 122 MSAs in which AT&T CallVantage currently has subscribers.

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<sup>15</sup> MSAs and LATA boundaries do not map to each other. For example, there are often multiple LATAs within an MSA, and the same LATA may serve different MSAs.

AT&T is continuing to work internally and with external vendors to come into full compliance. AT&T expects that by the third quarter 2006, it will achieve partial compliance in a sufficient number of LATAs to serve approximately 97% of its current AT&T CallVantage customer base. AT&T will thereafter continue to seek alternative technologies and solutions to reach 100% compliance as soon as possible.

**2. Obtaining Initial Registered Location Information: A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.**

For each existing subscriber and new subscriber AT&T obtained the customer's Registered Location, either through the AT&T CallVantage web portal or by telephone (depending on how the order was placed), at the time the customer first ordered its AT&T CallVantage Service. Accordingly, AT&T has obtained a Registered Location for 100% of AT&T CallVantage Service customers.

**3. Obtaining Updated Registered Location Information: A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.**

Subscribers may update their Registered Locations on their own volition, at any time, over the AT&T CallVantage web portal. Alternatively, subscribers may call an AT&T service agent by telephone by dialing a specified toll-free 800 number.

The process for updating a Registered Location is triggered automatically whenever AT&T's "Heartbeat Solution" (described below in item 4) detects the possible move of the subscriber's AT&T CallVantage terminal adapter (TA) and activates the call intercept procedure described below. In such instance, the customer is required to provide updated Registered Location information, either by calling a toll free 800 number (using any telephone, including the telephone connected to the AT&T CallVantage TA) or via the web portal (using a computer).

If the customer attempts to place an outgoing call using her TA first before updating her Registered Location, an intercept message advises the customer that before she can complete a call, AT&T must confirm the location of the customer's TA. The customer is then advised to "press 1" if her TA has not been moved to a different address than the service address on record with AT&T, and to "press 8" if the TA has been moved.

If the customer indicates the TA *has not* been moved, service is restored and outgoing calls will be completed. If the customer indicates the TA *has* been moved, the customer is

instructed to register the new service address with AT&T, by using either the web portal (the web address is provided), or by dialing a specified 800 number. Until such time as the address is updated, the customer is limited to making only 911 or 8YY calls. (The customer is also advised that until her registered 911 service location is updated, any 911 calls will be routed and emergency services dispatched based on the existing registered service location and that she should advise the emergency operator of her new location if she makes a 911 call before the Registered Location is updated.)

If a customer goes to the AT&T CallVantage web portal before attempting to place an outgoing call using her TA, as soon as the customer logs in, she will see a web page that will advise her of the same information described above, *i.e.*, that: (1) AT&T has detected that her TA may have been moved; (2) outgoing calls will be blocked until she confirms or updates her Registered Location information; (3) 911 calls will still be completed, but will be routed based on her old address, and (4) to remove the restriction she must go to the next section of the web page and either update her address or indicate there has been no address change.

Both methods for obtaining updated Registered Location information, described above, permit customers to use the same equipment as they use to access their interconnected VoIP service.

**4. Technical Solution for Nomadic Subscribers: A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.**

AT&T's technical solution for nomadic subscribers was described in detail in its October 7, 2005 *ex parte* updating the Commission on AT&T's plans to ensure that AT&T CallVantage Service remained in compliance with the Commission's rules. That letter described AT&T's "Heartbeat Solution," which enables customers to obtain proper 911 routing when they use AT&T CallVantage Service nomadically within AT&T's 911-capable footprint, and only enables service at locations where AT&T can provide 911 capabilities.

The AT&T CallVantage TAs are equipped with a feature that allows the TA to send a communication to the AT&T network once every twenty-four hours. Any time the TA is disconnected from a power source and then reconnected, the TA "checks back in" with the AT&T network and the twenty-four hour cycle is reset. Upon reconnection, AT&T's network can detect that the twenty-four hour cycle has shifted; *i.e.*, it can detect that the TA has been disconnected and then reconnected.

Once the Heartbeat Solution has detected the possibility of customer movement of the VoIP TA, the AT&T network will temporarily suspend the customer's service and will post a message at the customer's AT&T CallVantage web portal directing the customer to confirm the existing registered location address or register a new location address. If a customer attempts to make a call before confirming or registering the new 911 service location, AT&T will institute a call intercept that will require the customer to confirm that their registered 911 service location has not changed. If the customer confirms that she is still using the service at

her registered 911 service location, full service will be immediately restored, and calls can be completed. If the customer confirms that she has moved her service from the existing registered location address, service will remain suspended until she registers a new 911 service location address (via either the web portal or a call to an AT&T service representative). As noted above, the customer is also advised that until her registered 911 service location is updated, any 911 calls will be routed and emergency services dispatched based on the old registered location and that she should advise the emergency operator of her new location in case she makes a 911 call before the Registered Location is updated.

If the new registered 911 service location entered by the customer is a location within the geographic area in which AT&T can provide 911 calling, the necessary network routing that will allow a 911 call to be routed to the new, geographically appropriate PSAP will be in place within minutes after the customer registers the new location address. Alternatively, if the customer indicates a location outside the geographic area in which AT&T can provide 911, or does not provide any address update, the customer's service will remain suspended. If the customer fails to confirm the existing registered 911 service location or register a new 911 service location, service will remain suspended, but 911 calls will continue to be routed to the PSAP associated with the existing registered location. Thus, as a result of the Heartbeat Solution, a customer will be required to register a new 911 service location in order to use the service nomadically.

## Attachment #1

**MSA/LATA Coverage:**

Does not indicate coverage of all PSAPs in a LATA or all of MSAs.

Coverage provided by a combination of AT&T & VPC Provider Services.

<b>LATA</b>	<b>MSA</b>	<b>In Area Only</b>	<b>In Area + Out of Area</b>
120	Maine		X
122	Kenosha, WI	X	
128	Boston (MA)	X	
	Lowell (MA)		
130	New London- Norwich (CT)	X	
	Ri-Ma (MA)		
132	NYC (NY)	X	
	Nassau (NY)		
	Stamford - Norwalk (CT)		
134	Albany (NY)	X	
	Glens Falls (NY)		
136	Syracuse (NY)	X	
	Utica- Rome (NY)		
138	Albany (NY)		
140	Rochester (NY)	X	
	Buffalo (NY)		
220	Monmouth Ocean (NJ)		X
	Philadelphia (PA)		
222	Monmouth Ocean (NJ)		X
	Trenton (NJ)		
224	Newark (NJ)		X
	Bergen (NJ)		
	Middlesex-Somerset-Hunterdon (NJ)		
	Monmouth Ocean (NJ)		
	Jersey City (NJ)		
228	Wilmington (DE)	X	
	Philadelphia (PA)		
	Allentown (PA)		
234	Pittsburgh (PA)	X	
236	Washington (DC)	X	
	Baltimore (MD)		
238	Washington (DC)	X	
	Baltimore (MD)		
248	Norfolk (VA)	X	
320	Cleveland (OH)	X	
	Akron (OH)		
324	Columbus (OH)	X	
336	Indianapolis(IN)	X	
	Muncie (IN)		
340	Detroit (MI)	X	
	Ann Arbor (MI)		
	Flint (MI)		
344	Detroit (MI)		
	Flint (MI)		
348	Detroit (MI)		
	Grand Rapids (MI)		
356	Milwaukee-Waukesha (WI)	X	
	Kenosha, WI		

**MSA/LATA Coverage:**

## Attachment #1

Does not indicate coverage of all PSAPs in a LATA.

Coverage provided by a combination of AT&T & VPC Provider Services.

<b>LATA</b>	<b>MSA</b>	<b>In Area Only</b>	<b>In Area + Out of Area</b>
356 cont	Racine, WI		
358	Chicago., IL	X	
422	Greensboro, NC	X	
	Charlotte, NC		
424	Raleigh, NC	X	
426	Raleigh, NC	X	
438	Atlanta, GA	X	
452	Jacksonville, FL	X	
454	Tampe- St. Petersburg (FL)		
	Orlando (FL)		
	Jacksonville, FL		
458	Orlando (FL)	X	
	Melbourne (FL)		
	Daytona Beach (FL)		
460	Miami, FL	X	
	Fort Lauderdale, FL		
	Fort Pierce - Port St Lucie, FL		
	West Palm Beach, FL		
470	Nashville, TN	X	
	Chattanooga, TN		
	Huntsville, AL		
472	Chattanooga, TN	X	
474	Knoxville, TN	X	
476	Birmingham, AL	X	
	Tuscaloosa, AL		
520	St. Louis, MO	X	
524	Kansas City, KS	X	
552	Dallas, TX	X	
	Fort Worth, TX		
558	Austin, TX	X	
	San Antonio, TX		
560	Houston, TX	X	
	Brazoria, TX		
566	San Antonio, TX	X	
628	Minneapolis -St. Paul, MN	X	
644	Omaha, NE	X	
656	Denver, CO		X
	Boulder - Longmont, CO		
660	Salt Lake City - Ogden, UT	X	
	Provo - Orem, UT		
	Las Vegas, NV		
666	Phoenix-Mesa (AZ)	X	
	Las Vegas, NV		
672	Portland-Vancouver, OR	X	
	Salem, OR		
674	Seattle, WA		X
	Tacoma, WA		
	Bellingham, WA		

**MSA/LATA Coverage:**

Does not indicate coverage of all PSAPs in a LATA.

## Attachment #1

Coverage provided by a combination of AT&T & VPC Provider Services.

<b>LATA</b>	<b>MSA</b>	<b>In Area Only</b>	<b>In Area + Out of Area</b>
674 cont	Bremerton, WA		
	Olympia, WA		
722	Oakland, CA	X	
	San Jose, CA		
	San Francisco, CA		
	Sacramento, CA		
	Santa Rosa, CA		
	Santa Cruz-Watsonville, CA		
	Vallejo-Fairfield-Napa, CA		
726	Sacramento, CA	X	
	Vallejo-Fairfield-Napa, CA		
730	Orange County, CA	X	
	LA, CA		
	Riverside-San Bernadino, CA		
	San Diego, CA		
	Ventura, CA		
	San Jose, CA		
732	San Diego, CA	X	
920	Hartford, CT	X	
	Stamford - Norwalk (CT)		
	New Haven-Meriden (CT)		
	Bridgeport (CT)		
	Danbury (CT)		
	Waterbury, CT		
	New London- Norwich (CT)		
	Worcester (MA)		
922	Cincinnati, OH	X	
952	Tampe- St. Petersburg (FL)	X	
	Sarasota-Bradenton, FL		
	Lakeland- Winter Haven, FL		
974	Rochester (NY)	X	
<b>Total number of MSA/LATAs</b>	<b>122</b>	<b>48</b>	<b>6</b>