**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, D. C. 20554**

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| In the Matter of | ) | |
| | ) | |
| IP-Enabled Services | ) | WC Docket No. 04-36 |
| | ) | |
| E911 Requirements for IP-Enabled Service Providers | ) | WC Docket No. 05-196 |
| | ) | |

**BELLSOUTH CORPORATION'S RESPONSE TO VONAGE AMERICA, INC.'S PETITION FOR EXTENSION OF TIME AND LIMITED WAIVER**

## I. INTRODUCTION

BellSouth Corporation ("BellSouth"), on behalf of its wholly owned affiliates, respectfully files this response to the Petition for Extension of Time and Limited Waiver by Vonage America, Inc. ("Vonage"). Although BellSouth takes no position on the merits of Vonage's request for additional time to comply with and, if necessary, a limited waiver of the requirements set forth in the Commission's *First Report and Order*,[1] BellSouth cannot let go unanswered Vonage's accusations that BellSouth, among others, is to blame for Vonage's failure to comply with such requirements. While the provision of E911 service is a cooperative effort involving multiple parties – providers, vendors, incumbent local exchange carriers ("ILECs"), and Public Safety Answering Points ("PSAPs") – ensuring that Vonage's customers can reach an emergency operator in the event of a crisis is ultimately Vonage's responsibility. For too long, Vonage has attempted to shirk this responsibility by pointing fingers at or seeking to blame

[1] *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) ("*First Report and Order*").

others for its failure to provide E911 services to its customers. Notwithstanding Vonage's claims to the contrary, BellSouth has cooperated fully with Vonage in its efforts to provide E911 service, and BellSouth is filing this response in order to set the record straight.

## II. DISCUSSION

In seeking additional time to comply with and a limited waiver of the *First Report and Order,* Vonage claims that it "has experienced three main obstacles" in providing E911 service, but for which Vonage insists that its "network is fully prepared to handle and process E911 calls."[2] These three alleged "obstacles" are: (i) the unavailability of or delay in obtaining pseudo-Automatic Number Identification ("pANI"); (ii) "significant delays" in having ILECs create "MSAG ledgers/shell records (hereafter, 'shell records') for the PSAPs"; and (iii) the lack of readiness on the part of PSAPs to accept VoIP calls.[3] Vonage also claims that the alleged lack of "mapping information" about the E911 selective routers "delayed Vonage's implementation

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[2] Vonage Petition at 2 & 4. Vonage asserts that, as of November 28, 2005, it "is capable of transmitting Automatic Number Identification ("ANI") and registered location information for 100% of its subscriber lines and has established connectivity to selective routers for more than 90% of those lines." At the same time, Vonage states that only "26% of Vonage's customer lines will have the benefit of E911 call delivery to capable PSAPs as of November 28, 2005." *Id.* at 2. Vonage appears to take the position that, simply because it has loaded its call server with subscriber ANI and has developed a database to house end user registered locations, it is "capable" of transmitting ANI and registered location information to its vendor – Telecommunications Systems ("TCS"). However, TCS is unable to transmit that same information to the PSAPs until it has completed submission of the shell records and the associated pANI and NPA-NXX information into the BellSouth Automatic Location Information ("ALI") database. Furthermore, in order to provide E911 service, Vonage or its vendor must establish connectivity to each selective router serving the PSAPs, of which there are approximately 6,000 nationwide. However, Vonage admits that, as of November 28, 2005, connectivity had been established with selective routers serving only 746 PSAPs, *id.* at 3, which explains why relatively few of Vonage's customer lines currently enjoy the benefit of E911 service.

[3] Vonage Petition at 4-5.

efforts ...."[4] BellSouth addresses Vonage's claims about mapping information, pANIs, and shell records below.

### A. Mapping Information

Vonage complains that, "until November 18, 2005, there was no comprehensive list of all of the selective routers in the United States and no comprehensive list of which PSAPs are connected to which selective routers." Furthermore, according to Vonage, "[i]n most instances, despite repeated requests, the ILECs which Vonage has worked with did not or could not provide critical mapping information" that mapped the PSAPs to selective routers.[5]

Vonage does not identify BellSouth by name, but – for the record – any implication that BellSouth is one of the ILECs to which Vonage is referring would be false. On May 13, 2005, several weeks before the Commission even released its *First Report and Order*, BellSouth provided Vonage with a comprehensive list that mapped each of the E911 selective routing tandems in BellSouth's region to each county served by that selective router. On June 16, 2005, BellSouth also provided Vonage with a spreadsheet identifying each PSAP in BellSouth's region by name and the selective router serving that PSAP. In addition, at one of the weekly meetings BellSouth initiated at Vonage's request to discuss Vonage's E911 needs for its VoIP services,[6] BellSouth offered to provide assistance to Vonage if it had any difficulty mapping selective routers to particular PSAPs.[7] Thus, Vonage's suggestion that its implementation efforts were "substantially hindered" by the "with[holding] critical information, such as PSAP coverage area

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[4] *Id.* at 12.

[5] *Id.* at 12-13.

[6] Summaries of these weekly meetings are attached collectively as Exhibit 1.

[7] *See* Exhibit 1, at 6 (Summary of BellSouth/Vonage June 17, 2005 Conference Call).

information, selective router location information, and resource availability ..." is not true with respect to BellSouth.[8]

**B. pANIs**

Vonage's Petition seeks to perpetuate the myth that it is "unable to obtain p-ANI directly or indirectly," which, according to Vonage, "has dramatically impaired Vonage's ability to route calls to certain PSAPs."[9] While it is true that Vonage and competing carriers may be unable to obtain nondialable numbers (in the form of NPA-211-XXXX and NPA-511-XXXX) which are used as pANIs in certain regions, BellSouth does not limit pANIs to nondialable numbers. In fact, as BellSouth has previously advised the Commission: (i) BellSouth allows dialable numbers to be used for pANI purposes; (ii) wireless carriers use dialable numbers for pANIs as does one VoIP Positioning Center ("VPC") operator in BellSouth's region today; and (iii) both VoIP Service Providers ("VSPs") and competing carriers have ready access to dialable pANI resources.[10] Thus, Vonage has full access to pANIs in BellSouth's region, notwithstanding its claims otherwise.

Even though Vonage could readily obtain dialable numbers for pANI purposes, BellSouth developed an entirely new pANI service in response to Vonage's request. Vonage's complaint that "BellSouth did not provide Vonage a draft pANI contract until late August ..." is without merit.[11] In fact, BellSouth provided Vonage with a professional services agreement for pANIs on July 29, 2005. Although the service was developed exclusively for Vonage and at

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[8] Vonage Petition at 22.

[9] *Id.* at 26.

[10] *See* Ex Parte Letter from Bennett Ross, Counsel for BellSouth, to Marlene Dortch, Secretary, FCC (November 28, 2005).

[11] Vonage Petition at 14.

Vonage's sole request, Vonage waited more than three months – until November 14, 2005 – before offering any changes to BellSouth's proposed agreement or expressing its intention to take the service from BellSouth. Thus, while contending that "pANI availability is an essential gating item for nomadic VoIP E911 deployment,"[12] Vonage never explains why it waited so long to finalize a pANI agreement with BellSouth.

As to Vonage's claim that BellSouth only "recently advised Vonage that it could assign pANIs only at the full tandem, not at the individual PSAP level ...,"[13] BellSouth designed its pANI offering for the fully nomadic solution assuming that all PSAPs would need to be reached. BellSouth built its database consistent with the preliminary industry recommendation for call processing and aligned the number of PSAPs behind each tandem to accommodate this formula. It is the responsibility of the VSP or its agent to assign the pANI numbers down to the PSAP level and submit this information for inclusion in BellSouth's ALI database as they negotiate with each individual PSAP. BellSouth has provided enough pANIs to allow the call processing to function properly so as to identify the provider and PSAP where the caller information should be delivered. Furthermore, Vonage's desire to assign pANIs to only selected PSAPs appears inconsistent with Vonage's statement that its "E-911 system is national in scope and functionality."[14] In order to have a national E-911 system, Vonage must be able to assign pANIs, either directly or indirectly, to every PSAP, not only a selected few.

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[12] Vonage Petition at 13.

[13] *Id.* at 14.

[14] *Id.* at iii.

It is not true, as Vonage claims, that BellSouth "requires Vonage to purchase more pANIs than it can use, thus unnecessarily resulting in a waste of numbering resources."[15] Based upon BellSouth's wireless experience, a minimum of five pANIs per PSAP is necessary to support simultaneous calls to the PSAP. It is certainly not an excessive quantity unless Vonage only intends to allow one of its customers at a time to place an E911 call to the same PSAP.

Equally without merit is Vonage's suggestion that BellSouth "would not permit Vonage to purchase service out of [] existing tariffs" and instead "imposed unreasonable positions – typically through professional services or acknowledgment agreements, by forcing Vonage to wait months while 'new' tariffs were developed and in some cases, even declining to make negotiators consistently available."[16] First, BellSouth did not have an existing federal tariff that would accommodate Vonage's need to establish direct connectivity to each of the selective routers in BellSouth's region, and BellSouth's state E911 tariffs only apply to commercial mobile radio service ("CMRS") providers. Nevertheless, in May 2005, in response to Vonage's request, BellSouth announced that it would offer a new service that would allow direct interconnection to each of the selective routers in its region. This service was developed on an expedited basis and tariffed at the federal level effective August 2, 2005. Vonage only recently placed orders under this tariff, even though it could have done so as early as August and had circuits in place well before the Commission's E911 deadline.

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[15] *Ex Parte* Letter from Sharon O'Leary, Chief Legal Officer & Executive Vice President of Vonage Holdings Corp., to Bennett L. Ross, Counsel for BellSouth (December 7, 2005).

[16] Vonage Petition at 21-22.

BellSouth acknowledges that it initially indicated to Vonage that it expected its federal tariff "to be filed with the Commission and effective as of late June 2005."[17] However, after the project got underway, BellSouth encountered development issues associated with its systems that had to be addressed before the tariff offering could be implemented. These issues were ultimately resolved, and the tariff has been in effect since August 2, 2005. While BellSouth regrets the slight delay in implementing this new service, it had no impact on Vonage, since Vonage did not attempt to place an order for this service until November 23, 2005. Under these circumstances, Vonage's claim that "BellSouth's tariffing process caused Vonage to suffer substantial delay in deploying its E911 network" is simply untrue.[18]

The same can be said for Vonage's complaints about BellSouth's alleged refusal to participate in a trial by permitting Vonage "to place trunk orders pending tariff completion."[19] BellSouth was not in a position to conduct such a trial prior to completion of the tariff because BellSouth was still making changes to its systems that were required before orders could be accepted. In any event, a week prior to the tariff becoming effective, BellSouth offered to conduct a trial with Vonage but Vonage declined.[20]

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[17] Vonage Exhibit 24, at 3.

[18] *Id.* at 4.

[19] *Id.*

[20] Vonage's unwillingness to participate in a trial shortly before BellSouth's tariff took effective may be attributable to Vonage's decision to utilize a third party for accessing BellSouth's selective routers, which would obviate the need for BellSouth's tariffed service. However, the third party selected by Vonage does not have established connectivity to each of these selective routers, and thus Vonage recently began placing orders for BellSouth's tariffed service to establish connectivity to the routers in question.

Second, while Vonage has insisted from the start of this process that it sought nothing more than the equivalent access to E911 infrastructure enjoyed by CMRS providers,[21] Vonage conveniently overlooks the fact that CMRS providers – and not BellSouth – provision and assign pANIs. While other ILECs apparently made the business decision to manage pANIs in connection with CMRS E911, BellSouth did not. Instead, CMRS providers (as well as competing carriers) have obtained and administered their own pANIs rather than relying upon BellSouth to do so – a process that has worked well for years.

Nevertheless, BellSouth developed an entirely new service for Vonage, which included BellSouth's maintaining a database containing pANI assignments and allocations and recording pANIs assigned to the customer at each of BellSouth's E911 tandem switches. While agreeing to develop this new service, BellSouth was only willing to do so upon Vonage's execution of a professional services agreement to cover some of the costs incurred by BellSouth in providing this new service, and there is nothing "unreasonable" about this approach.

Third, BellSouth has never "decline[ed] to make negotiators consistently available," as Vonage has alleged. BellSouth began working cooperatively with Vonage on E911 issues in March 2005, when BellSouth designated one of its vice presidents as the single point of contact for E911 discussions. BellSouth conducted weekly meetings with Vonage from May 2005 through August 2005, when Vonage advised that it would be working through a third party. Most recently, after Vonage finally responded to BellSouth's pANI professional service agreement on November 14, 2005, the parties successfully concluded their negotiations in less than three weeks. These negotiations could have been concluded some time ago had Vonage not waited more than three months before responding to BellSouth's proposal.

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[21] Exhibit 1, at 1 (Summary of BellSouth/Vonage May 13, 2005 Conference Call).

### C. Shell Records

Vonage spends considerable time criticizing BellSouth for the lack of "progress in the creation of shell records," insisting that BellSouth has been "unwilling or unable to cooperate in the creation of shell records, requiring Vonage to engage in a cumbersome, PSAP by PSAP process that is not conducive to national deployment of E911 service within 120 days."[22] Such criticisms are misguided.

A shell record is the means by which a service provider transmits its customers' telephone numbers and location information to BellSouth's ALI database for the provision of E911 service to the PSAPs. The format of shell records can vary from PSAP to PSAP, depending upon the specific information the PSAP wants to appear on its emergency operator's screen. Beyond the use of a standard field format, BellSouth does not dictate how a shell record should appear, and, it is the provider's responsibility to negotiate with the PSAP regarding the information in and form of the shell record. Each provider submits its shell records to BellSouth's database vendor (Intrado) for insertion into BellSouth's ALI database. Each PSAP in turn directly supplies its Master Street Address Guide ("MSAG") ledgers to Intrado for insertion into BellSouth's MSAG database. BellSouth does not see the shell records or MSAG ledgers directly and certainly does not "create" them for other carriers. This is a process that has been in practice in BellSouth's region for some time and has been consistently and successfully followed by PSAPs, CLECs and CMRS providers.[23]

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[22] Vonage Petition at 4 & 28.

[23] Several years ago BellSouth had offered to prepare shell records and perform associated services for CMRS providers pursuant to a professional services agreement. However, due to a lack of interest from the CMRS industry, BellSouth discontinued this offering in May 2003.

While insisting that it wants nothing more than to be treated like a CMRS provider for purposes of access to E911 infrastructure, Vonage actually wants something entirely different. What Vonage wants is for BellSouth to negotiate with each PSAP on Vonage's behalf about the information in and content of the shell records applicable to Vonage's customers. BellSouth does not do this for any CMRS provider or other carrier, and it is hard to understand why BellSouth should be in the middle of Vonage's business arrangements.

BellSouth has been clear about the processes and procedures surrounding the responsibility of the VSP, or its VoIP Positioning Center ("VPC") agent, to: (i) create the shell record after negotiating with each PSAP about its content and format; and (ii) ensure that each PSAP has submitted the MSAG ledger to Intrado. This process is plainly outlined in BellSouth's E911 guide for VSPs that has been available via the Internet since June 29, 2005.[24] Furthermore, BellSouth's representatives repeatedly advised Vonage of these requirements and emphasized the importance of commencing PSAP negotiations as early as possible.[25]

However, it appears that Vonage waited until July 2005 to even make written contact with the PSAPs and postponed personal visits until late summer, thereby delaying completion of PSAP negotiations concerning the content and format of Vonage's shell records and the PSAPs'

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[24] http://www.interconnection.bellsouth.com/guides/e911/html/avspe001/index.htm. Even before the VSP guide was posted on the Internet in June 2005, BellSouth had provided Vonage with a copy of BellSouth's wireless carrier E911 guide and applicable technical reference, which was the model on which the VSP E911 process was based. Thus, Vonage's claim that "BellSouth could not provide details surrounding the MSAG ledger creation and notification process" is false. *See Ex Parte* Letter from Sharon O'Leary, Chief Legal Officer & Executive Vice President of Vonage Holdings Corp., to Bennett L. Ross, Counsel for BellSouth, at 2 (December 7, 2005).

[25] *See, e.g.,* Exhibit 1, at 5 (Summary of BellSouth/Vonage June 10, 2005 Conference Call) ("BellSouth indicated that it is imperative for Vonage to meet with the PSAP's [sic] …").

submission of the MSAG ledger to Intrado.[26] In addition, Vonage's vendor – TCS -- did not sign a VPC agreement with BellSouth until October 12, 2005, which meant that TCS was unable to submit Vonage's shell records to Intrado before that date, even assuming it was otherwise prepared to do so. In short, any alleged lack of "progress" in the creation of Vonage's shell records is hardly BellSouth's fault.

## III. CONCLUSION

BellSouth recognizes the challenges associated with ensuring the VoIP customers have reasonable access to the E911 system. But the "obstacles" to which Vonage has pointed in its Petition are nothing more than the steps that every CMRS provider, competing carrier, and other VoIP providers must take in providing E911 compliant service to their customers. Taking such steps requires a certain commitment of time and resources, and Vonage's Petition amounts to little more than a complaint that BellSouth did not perform tasks that Vonage could and should have done itself. The responsibility for providing E911 service to Vonage's customers consistent with the Commission's requirements rests with Vonage, which should cease blaming BellSouth falsely for its failure to do so.

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[26] Exhibit 1, at 10 (Summary of BellSouth/Vonage July 19, 2005 Conference Call) ("Vonage indicated that a welcome package had been sent to targeted PSAPs and Vonage representatives are preparing to visit these PSAPs").

Respectfully submitted,

**BELLSOUTH CORPORATION**

By: /s/ Bennett L. Ross

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Date: December 12, 2005

#612915

# EXHIBIT 1

# BellSouth/Vonage
# Conference Call Summary
# May 13, 2005

| | Action Item/Assertions |
|---|---|
| | |
| 1 | Vonage desires a solution modeled after the wireless phase 2 solution. |
| 2 | Vonage has indicated that BellSouth is to assume that they are working with Intrado for VPC services. |
| 3 | Vonage to confirm that their proposed MPC/VPC provider already has connectivity to the BellSouth ALI Databases.(If not, new circuits will be required from the MPC/VPC to the ALI databases) |
| 4 | Vonage has requested contract language that is similar to that of wireless providers. |
| 5 | BellSouth will provide Vonage with E911 wireless carrier guide and technical reference TR73610. |
| 6 | BellSouth to provide CLLI code list of existing E911 tandems. |
| 7 | BellSouth to provide a list of E911 tandem CLLI codes by county. |
| 8 | Vonage has confirmed that they will interconnect (via dedicated redundant trunks) into BellSouth's 64 E911 tandems. |
| 9 | Vonage will obtain PANI's. |
| 10 | BellSouth will explore offering Vonage a professional services arrangement for pANI and provide a draft quote. However, BellSouth has not committed to provide such service and any quote provided will be for discussion only and is not a commitment by BellSouth to provide such service. |

# BellSouth/Vonage
# Conference Call Summary
# May 20, 2005

| | Action Item/Assertions |
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| | |
| 1 | Vonage is using Intrado as their MPC/VPC provider and will work directly with Intrado for connectivity to the ALI database and for all other MPC/VPC services. Vonage will confirm with Intrado if the Intrado VPC will use the same interface as the Intrado MPC. If it doesn't, additional time will be required to get a new interface in place. |
| 2 | Network architecture and requirements<br>- BellSouth has confirmed that the interface to the Selective Routers will be at a DS-1 level.<br>- Vonage has confirmed that they will bring redundant DS-1 facilities to each Selective Router from a designated Vonage Point of Presence.<br>- BellSouth has confirmed that they will not groom circuits (This will be the responsibility of Vonage).<br>- BellSouth has confirmed that each trunk group carries a minimum of 2 redundant DS-0's (for reliability these redundant trunk members should be diversely routed where possible).<br>- Vonage will provide network diagrams |
| 3 | BellSouth will confirm the ordering, provisioning and testing process (forms, contacts, systems, etc..). |
| 4 | Potential Professional Service Offering—(ordering and provisioning)<br>- Vonage has requested pricing for ordering and provisioning services<br>- BellSouth to provide rate structure |
| 5 | BellSouth to confirm E911 service offering and pricing.<br>- Vonage has requested contract language that is similar to that of a wireless provider. |
| 6 | Potential pANI offering<br>- Vonage has requested 5 assignable contiguous numbers by PSAP |
| | |

# BellSouth/Vonage
# Conference Call Summary
# May 26, 2005

| | Action Item/Assertions |
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| | |
| 1 | Vonage will confirm to BellSouth the details of their connectivity to the ALI Database and any other MPC/VPC services that may affect BellSouth's provisioning and service. |
| 2 | Vonage has confirmed that they will manage 2 network Points of Presence.<br>- Inforum Atlanta<br>- Winston Salem, North Carolina |
| 3 | Vonage supplied BellSouth with a network layout and information flow diagrams. BellSouth noted the following:<br>- Call's should be routed out of the Vonage switch based on the ESRN they receive from their VPC provider, and Vonage must pass the pANI (ESQK) in the Calling Party Number field of the SS7 IAM, along with the digits 911 as the Called Party Number field. Additionally, for routing purposes any information in the charge number field is irrelevant.<br>- BellSouth connectivity does not exist into 100% of all PSAP's within the southeast region.<br>- Separate trunk group will be required into each Nortel DMS E911 tandem, representing each destination PSAP and Vonage must communicate to BellSouth on how it desires to structure the trunk groups during provisioning of the trunks.<br>- Vonage should work with the VPC in regard to pANI call through testing.<br>- The subscribers provisioned Postal Address must be MSAG valid.<br>- Vonage can focus on the BellSouth Wireless E911 guide to confirm NENA recommendations regarding SS7 Guidelines for switching wireless calls to the Selective Router.<br>- The pANI (ESQK) is always in the calling party number.<br>- The OLI does not need to be populated and is irrelevant for I2.<br>- Certain pANI issues may also relate to No Record Found. Normal pANI provisioning time into the ALI database is approximately 24 hours. If the pANI is not provisioned the call will default route based on incoming trunk group, and the ALI database will not have any record for the PSAP to use to identify the caller or their VSP, additionally the NENA ID will need to be provisioned in the pANI (ESQK) shell record. |
| 4 | Ordering and Provisioning<br>- BellSouth has confirmed that Vonage will be required to order from our Common Access Front End System (CAFÉ).<br>- The BellSouth account team will work with Vonage to provide information regarding this system (i.e. account ID's and passwords) |
| 5 | BellSouth has requested that Vonage supply a list of the critical areas within the region that will be initially provisioned.<br>- As part of the required provisioning information ESN's will be required from each PSAP. |
| 6 | BellSouth has confirmed that the E911 service offering will be priced out of the FCC tariff. The tariff should be finalized by June 30, 2005. |
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# BellSouth/Vonage
# Conference Call Summary
# June 3, 2005

| | Action Item/Assertions |
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| | |
| 1 | BellSouth has confirmed that the E911 FCC tariff'd offer will pertain to all states within the BellSouth region. |
| 2 | The BellSouth account team indicated that they will serve as the initial interface for ordering and provisioning issues.<br>- The account team will confirm to Vonage on whether or not bulk ordering can occur within the CAFÉ provisioning system.<br>- In order for Vonage to obtain an understanding of the CAFÉ system the account team will provide Vonage with access to the system's menu.<br>- Based on the items above Vonage will make a determination on whether or not they will choose to utilize BellSouth's professional services. |
| 3 | Vonage has confirmed that Miami, Florida will be the first area to be provisioned. |
| | |

# BellSouth/Vonage
# Conference Call Summary
# June 10, 2005

| | Action Items/Assertions |
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| | |
| 1 | Vonage has confirmed that Nashville, Tennessee may be another critical area that will be a priority for provisioning purposes. BellSouth confirmed that for provisioning purposes ESN's will be required from each PSAP within this area. |
| 2 | Vonage requested the likelihood of ordering E911 services out of the General Subscriber Services Tariff (GSST). BellSouth indicated that for VSP's (such as Vonage), the E911 service offering will fall under FCC jurisdiction. The GSST E911 service offering is available for licensed CMRS providers and not VSP's. |
| 3 | Vonage requested the likelihood of performing a Beta Trial in Miami, Florida. BellSouth indicated that this may be possible and agreed to take this as an action item. BellSouth will need to determine the trial period and billing process. |
| 4 | BellSouth indicated that interoperability interface testing will be required between Vonage's VPC and BellSouth's ALI database to determine that information passed between networks is accurate. |
| 5 | Vonage indicated that their gateway router will be either Sonus or Cisco. |
| 6 | Vonage confirmed that redundancy will exist between their gateways and each BellSouth SR. |
| 7 | BellSouth confirmed that Vonage will need to confirm the mapping to PSAP's from each SR. BellSouth requires a minimum of 2 DS-0's per trunk group. |
| 8 | BellSouth indicated that it is imperative for Vonage to meet with the PSAP's in order to confirm trunking requirements and determine the appropriate MSAG records and which ESN's to associate with their pANI's (ESQK's). |
| 9 | BellSouth indicated that currently DS-1 transport circuits cannot be ordered to test continuity or interfaces. BellSouth will confirm with Vonage the availability date. |
| 10 | BellSouth will confirm timelines with Vonage as information becomes available. BellSouth expects to file its tariff with the FCC during the last week of June or first week of July. |
| 11 | Vonage has confirmed that its SS7 signaling provider is Verisign. |

**Attendees:**

**BellSouth**
Eric Schwartz
Genia Pino
Tom Breen
William Marczak
Kim Xiong
Rick Chapes

**Vonage**
Michael Doherty
Ed Mulligan
Zenas Choi
John Cummings

# BellSouth/Vonage
# Conference Call Summary
# June 17, 2005

| | Action Items/Assertions |
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| | |
| 1 | Vonage and BellSouth confirmed that the scope of the weekly conference calls will be technical in nature and focus on product specifications and processes. It was confirmed that any regulatory or legal discussion will be conducted via separate conference calls. |
| 2 | BellSouth offered further information in regard to interoperability interface testing. BellSouth confirmed that lab testing must be performed before BellSouth can turn up a VPC in production. BellSouth will provide Vonage with the E2 interface requirements.<br>BellSouth confirmed that a test plan for testing between the ALI database and the E2 interface must be submitted to BellSouth for approval. Vonage had requested that BellSouth submit the technical reference document for interoperability testing of the E2 interface. BellSouth indicated that they would provide.<br>BellSouth indicated that the timeframe of the actual testing process is approximately 8 hours or less.<br>BellSouth also confirmed that Vonage's potential VPC providers (TCS or Intrado) has not approached BellSouth to inquire about technical requirement.<br>BellSouth will confirm to Vonage the timeline of the testing process.<br>Vonage indicated that as soon as this testing phase is complete and BellSouth provides notification of approval then Vonage will immediately request that BellSouth move to trial the service in Miami. |
| 3 | BellSouth indicated that a VPC operating agreement must be in place between BellSouth and the respective VPC. Vonage requested that a draft agreement be sent to Intrado and TCS. Vonage will supply BellSouth with the contact information of the respective Intrado and TCS representatives.<br>BellSouth indicated that the agreement indicates that BellSouth is acting as Vonage's agent. |
| 4 | Vonage inquired about the trunk ordering process. BellSouth confirmed that this process falls in line with the E911 service offering and will not be coordinated separately. |
| 5 | Vonage provided a spreadsheet that illustrated the mapping of Selective Routers to PSAPs. For any Selective Routers that cannot be matched to PSAP ID's Vonage will provide this list to the BellSouth account team for assistance. |
| 6 | BellSouth confirmed the timeline of the FCC tariff filing. BellSouth indicated that the tariff should be filed by the end of June or first week of July. Usually there is a 15 to 30 window for review by the FCC.<br>BellSouth indicated that they will request for an immediate effectiveness upon filing from the FCC.<br>BellSouth indicated that the tariff should be effective no later than August 15 if no unforeseen issues arise. |
| 7 | BellSouth indicated that a P-ANI offering will not be a part of the tariff filing. If it is offered it will be offered as a professional service. BellSouth also confirmed they were having an internal meeting on June 22 to clarify details of the service. |
| 8 | Vonage, in clarifying its position with BellSouth, further expressed a willingness to order the E911 service out the of state tariff. BellSouth acknowledged Vonage's statement. |
| | |

**Attendees:**

**BellSouth**
Eric Schwartz
Genia Pino
Tom Breen
William Marczak
Rick Chapes

**Vonage**
Michael Doherty
Ed Mulligan
John Cummings

# BellSouth/Vonage
# Conference Call Summary
# July 1, 2005

| | Action Items/Assertions |
|---|---|
| | |
| 1 | BellSouth indicated that they hope to test with TCS the week of July 18 and commence testing with Vonage during the last week of July. This timeline is contingent upon the success of the E2 interface and operating system updates. |
| 2 | BellSouth confirmed that the pANI agreement will be a professional services agreement that will provide for pANI utilization reporting and utilize NPA 211-XXXX and NPA 511-XXXX schema's. |
| 3 | After reviewing the conference call summary notes Vonage provided comments to certain points:<br>- May 26 Meeting- Point 4, Ordering and Provisioning- Vonage questioned why BellSouth had chosen to develop new tariffs. BellSouth had responded that they viewed the E911 ruling as Federal in nature and therefore was filing new tariffs to support the Order. Furthermore Vonage could not order under the State tariff.<br>- May 26 Meeting-Point 6, BellSouth indicated that the tariff would be available within 15 days. Vonage expressed an interest in reviewing the tariff prior to issuance in an effort to work with BellSouth to ensure that the tariff has the capabilities for VOIP providers to provide E911 service. BellSouth stated that they would support this request and give Vonage a preview.<br>- June 3 Meeting-Point 2- BellSouth indicated that Vonage will be able to preview the tariff once the product manager returns from vacation.<br>- June 3 Meeting-Point 4 (new point)-Vonage raised the question again and stated that they are willing to order out of the existing State tariffs and allow BellSouth to migrate them to the future FCC tariff. BellSouth indicated that they will need input from the product manager to answer this question.<br>- June 10 Meeting-Point 7-BellSouth confirmed that all 64 Selective Routers are DMS switches and can support SS7 but did not provide S/R to PSAP mapping and indicated that Vonage will need to confirm the mapping to PSAP's from each S/R.<br>- June 10 Meeting-Point 10-Bellsouth indicated that the tariff implementation interval would be 30 days and would therefore be available August 1. Thus no orders could be placed until after August 1 at the earliest. Vonage again voiced their desire to view the tariff prior to filing. BellSouth indicated that Vonage will not be allowed to preview the tariff. BellSouth stated that this may not be legal and will follow-up on the legality of allowing Vonage to view the new tariff prior to issuance. BellSouth indicated that their internal systems and processes will need to be modified for VOIP but there is no technical limitation to handling/provisioning VOIP orders. |
| | |

**Attendees:**

**BellSouth**
Eric Schwartz
Genia Pino
Tom Breen
Kim Xiong

**Vonage**
Michael Doherty
Ed Mulligan

# BellSouth/Vonage
# Conference Call Summary
# July 8, 2005

| | Action Items/Assertions |
|---|---|
| | |
| 1 | BellSouth clarified last month's statement regarding expected filing date with the FCC. Last month BellSouth indicated that it expected to file its tariff with the FCC during the last week of June or first week of July. BellSouth also indicated that the tariff should be effective no later than August 15 if no unforeseen issues arose. BellSouth confirmed to Vonage that the expected filing date has changed due to additional project development initiatives; however, BellSouth still expects the tariff to be effective no later than August 15 if no unforeseen issues arise. |
| 2 | BellSouth indicated that a deposit will be required for transport facilities connecting to the S/R. BellSouth indicated that this is a standard requirement for all ICS customers that purchase transport facilities. |
| 3 | Vonage indicated that they must secure three critical elements to implement the nomadic E911 solution: 1) establish connectivity access to the S/R's; 2) steering functions to direct a VOIP customer's calls to the correct PSAP, including connectivity between those steering functions and the AL database; 3) PANI's necessary to access the S/R database and ALI database. |
| | |

**Attendees:**

**BellSouth**
Eric Schwartz
Tom Breen
Rick Chapes

**Vonage**
Michael Doherty
Nick Deluca

# BellSouth/Vonage
# Conference Call Summary
# July 19, 2005

| | Action Items/Assertions |
|---|---|
| | |
| 1 | Vonage indicated that the Miami Beta Trial and the establishment of the critical deployment areas within the region have not been finalized. |
| 2 | Vonage indicated that a welcome package has been sent to targeted PSAPs and Vonage representatives are preparing to visit these PSAPs. |
| 3 | Vonage confirmed that TCS will be their VPC provider in the BellSouth region. |
| | |

**Attendees:**

**BellSouth**
Richard Hansard
Kim Xiong
Pat Casey
Rick Chapes

**Vonage**
Michael Doherty

# BellSouth/Vonage
# Conference Call Summary
# July 29, 2005

| | Action Items/Assertions |
|---|---|
| | |
| 1 | BellSouth confirmed that the tariff is expected to be filed on 08/01 and is hopeful that the FCC will grant immediate effectiveness. |
| 2 | Vonage indicated that the facilities deposit should be received by BellSouth next week. |
| 3 | BellSouth indicated that the VPC contract was sent to TCS. BellSouth also requested that Vonage must send a confirmation to BellSouth formally confirming their VPC provider. |
| 4 | Vonage confirmed that their S/R to PSAP mapping was nearing finalization. |
| 5 | BellSouth and Vonage confirmed that after the tariff becomes effective the technical implementation meetings will focus more on provisioning and orders. Both parties concluded that formal documentation of these meetings is no longer required. |
| | |
| | |

**Attendees:**

**BellSouth**
Genia Pino
Eric Schwartz
Kim Xiong
Rick Chapes

**Vonage**
Michael Doherty
Nick Deluca