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RE: WC Docket No, 05-196

E911 Compliance Letter

To whom it may Concern

Following is the information that describes our situation in regards to Voip E911 service.

911 Solution:

ITP / Linefire, Inc. ("ITP") has contracted with Telefinity / Dash 911 for E911 service. AS of 11/25/05 ITP has 318 active customers. These 318 customers have 398 lines. 100% of these customers were informed that there is no E911 service available at this time. The method of contact was mail, email and by website. At this time Telefinity is the sole source of E911 service for ITP. Based on the information given to us by Telefinity, the following schedule for our current customer base seems to apply

Schedule	Lines	Percent
Will be deployed by 11/28	103	26%
Targeted for deployment 11/28 with outstanding issues	197	49%
Targeted for deployment end of Q1 2006	42	11%
Targeted for deployment end of Q2 2006	56	14%
Total	398	100%

The V9-1-1™ solution enabled by Telefinity Dash911 through Intrado provides a true E9-1-1 solution for VoIP Service Providers. The solution provided by the Telefinity Dash911 affiliation with Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Telefinity Dash 911 thereby enabling VSPs to take advantage of a full end-to-end solution from one E911 service provider.

The only VSP requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Telefinity Dash911 via a real-time interface and the PSTN connectivity to the Telefinity Dash911 network to enable live 9-1-1 call

delivery. The real-time interface is via a SOAP API programming interface supplied by Telefinity Dash 911 to its VSP customers, or, a branded website interface provided by Telefinity Dash911 to its VSP customers.

○ **911 Routing Information/Connectivity to Wireline E911 Network:**

This information has been provided by Telefinity

Currently through the assistance of our Network providers, each of Telefinity Dash911's VSP customers will have access to 154 E9-1-1 Selective Routers by November 28th, 2005 and the attached "Major Market Deployment Map" and the "VoIP Deployment Plan" reflects the major market deployment schedules. Note: the market deployment map represent major markets where Intrado has reported to Telefinity Dash911 that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

○ **Transmission of ANI and Registered Location Information:**

- **Basic PSAP:** Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, the enclosed "Basic 9-1-1 PSAP" map could be used as reference information. While these areas are not included within the FCC Order and are not required for compliance, Intrado reports that they are actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery.

- **ANI Only:** There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate. Telefinity Dash911 has indicated that Intrado has noted that there are currently four (4) States and a Territory that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

New Jersey - In the State of New Jersey Intrado has obtained permission from the State to deploy a voice-only service which includes the call-taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

Ohio - To date, Ohio has not granted permission to Intrado to deploy a voice-only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

Hawaii - To date, Hawaii has not granted Intrado permission to deploy a voice-only solution. The ALI systems serving Hawaii are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population

At this time ITP has no customers in Hawaii.

Puerto Rico - To date, Puerto Rico has not granted permission to Intrado to deploy a voice-only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population

- **VSP Specific Metrics:** Please see enclosed VSP coverage Spreadsheet.
- **911 Coverage:**
 - **Deployment Overview** – The Telefinity Dash 911 E911 solution uses Intrado as a backbone supplier and as such Intrado is the VPC and is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached *“Major Market Deployment Map”*, which corresponds with MSAs, identifies regions within our subscriber territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. Telefinity Dash 911 has advised us that these areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This intention of this map is to demonstrate FCC compliance for the November 28th requirements and the future deployment strategy.

ITP has implemented all the necessary steps for interconnection with Telefinity. As Intrado brings more PSAP's onto their network , we will add the E911 service to the appropriate voip customers.

Obtaining Initial Registered Location Information:

ITP has contacted 100% of our current active customers to obtain their initial Address information. On November 29, 2005 Customers making a phone call will be rerouted to an IVR to confirm their 911 address. In addition customers logging into their account will have to confirm their address. On December 15th letters will be sent to all customers who haven't registered by then, New customers will automatically be signed up for E911 service if available in their county.

Obtaining Updated Registered Location Information:

Customers of ITP will be able to update their registered address in the following methods.

- 1) Website: The customer will be able to update their E911 information by logging into their account. This will update the Telefinity / Intrado database on a live basis.
- 2) Customer Service: Customers will be able to call the ITP customer service line to change their address.
- 3) In addition Telefinity has provided our customers with some additional methods for updating , see below

Telefinity Dash 911, as part of our total 9-1-1 solution, provides at least one way of updating each subscriber's Registered Location. As a component of the Telefinity Dash911 Service we have access to a near real-time address update system provided to us by Telefinity Dash911. This allows us to have near real-time delivery of the subscriber's address and also allows us as a VSP to submit a subscriber's address update information directly. The system allows us to have the subscriber input his initial address into the system at the time of initially signing up for our VoIP service. Addresses submitted are subjected to an immediate screening against the US Postal Service Street Address Guide in order to immediately determine if the submitted address is a valid address. VSPs may integrate VUI into their existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado systems.

Subscribers have more than one option to input, update or change their address. Subscribers can easily and quickly update their Registered Location by either (a) online via our website, or (b) use the Telefinity Dash911 telephone touch tone (IVR) system to either select another pre-registered address that the subscriber may already have on file, or to ask for an operator who will make the address change while the customer is on the phone.

At the time of an emergency VoIP 9-1-1 call, Telefinity Dash 911 passes the call directly to Intrado's call routing system. Intrado's call routing system uses the customer's provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid Address and Call Back Number of the user.

Telefinity Dash 911 also offers to us, as a VSP a newly-released product called "Level of Service (LoS) Query" that we can choose to integrate into our application. This functionality enables us to make a real-time query with an address of a customer/end user for the purpose of determining the level of 9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable us or our user to determine the level of 9-1-1 service available at that address and take appropriate action.

Technical Solution for Nomadic Subscribers:

As a VSP using Telefinity Dash911's E911 for VoIP service, we are able to route VoIP emergency calls from our VoIP network to Telefinity Dash 911's Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon connecting to the Internet at a new location/address. Through the Telefinity Dash 911 interface, the 9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly-provisioned address and make available (assuming no errors) that particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information.

We recognize the universal desire to remove the user interaction and self-provisioning component of the current 9-1-1 solution. To that end, we understand that Telefinity Dash

911, along with Intrado, are actively working a number of “location determination” technologies.

