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ATTORNEYS AT LAW

14 March 2006

**Ex Parte – Via Electronic Filing**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196  
*IP-Enabled Services*, WC Docket No. 04-36

Dear Ms. Dortch:

On 13 March 2006, Sharon O’Leary, Chris Murray, Scott Black, and Ed Mulligan of Vonage America, Inc. (“Vonage”), and undersigned counsel, held a conference call with Thomas Navin, Chief of the Wireline Competition Bureau (“WCB”), and with WCB staff members Christi Shewman and Rene Crittendon. During this meeting, the participants discussed how Vonage currently routes 911 calls placed by its customers.

Vonage’s customers can be grouped into the following classes of service:<sup>1</sup>

- For 62.3% of its customers, Vonage currently provides the full suite of E911 service pursuant to NENA’s i2 standard. This means that all such 911 calls are delivered via the native 911 network to the geographically appropriate PSAP and the PSAP is able to access both call back information (“ANI”) and location information (“ALI”) for that customer. In order to provide this service, Vonage uses the database services of two VoIP Position Center (“VPC”) subcontractors – Tele-Communications Systems (“TCS”) and Intrado.
- For 2.3% of its customers, Vonage currently provides voice-only 911 service because the PSAP that serves these customers’ Registered Locations is not capable of handling location and/or call back information. In other words, for these customers, Vonage

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<sup>1</sup> The figures for each class have been updated to reflect the progress made by Vonage as of the date of this letter and, therefore, vary slightly from those discussed on the call which reflected Vonage’s operations as of 12 March 2006.

delivers their 911 calls via the native 911 network to the geographically appropriate PSAP and the PSAP is able to conduct a two-way conversation with the caller. The PSAP, however, does not have automatic access to the caller's call back or location information because of the PSAP's own technical capability.

- For 6.7% of its customers, Vonage currently has 3<sup>rd</sup> party direct trunk connectivity to the appropriate Selective Router, and has gathered and processed all the necessary data inputs from the relevant ILECs and/or PSAPs to provide full E911 (*i.e.*, i2) service, but has not yet completed certain necessary system testing. Vonage anticipates completing these tests within 5 to 45 days, at which time it will be able to offer these customers the full suite of E911 services supported by the i2 standard. Vonage currently routes calls from these customers to the appropriate Selective Router with customer call back information. Such calls may be routed to the "default PSAP" rather than to the geographically appropriate PSAP for a customer's Registered Location.<sup>2</sup>
- For 8.7% of its customers, Vonage currently has 3<sup>rd</sup> party direct trunk connectivity to the appropriate Selective Router and has gathered all the necessary data inputs from the relevant ILECs and/or PSAPs to provide full E911 (*i.e.*, i2) service, but the ILECs and VPCs have not yet loaded the data into their respective databases. The necessary system testing is scheduled upon completion of this data load. Vonage anticipates that the data loading and system testing will be completed within 5 to 90 days, at which time it will be able to support these customers with the full suite of E911 services (or delivery of a voice-only call to the appropriate PSAP if the customer's PSAP is unable to handle call back and/or location information). Vonage currently routes calls from these customers to the appropriate Selective Router with customer call back information. These calls may be routed to the "default PSAP" rather than to the geographically appropriate PSAP for a customer's Registered Location.<sup>3</sup>
- For 16.4% of its customers, Vonage currently has 3<sup>rd</sup> party trunk connectivity to the appropriate Selective Router but is in the process of gathering the necessary data to provide E911 service from the relevant ILECs and/or PSAPs. Vonage currently routes calls from these customers to the appropriate Selective Router with customer call back information. These calls may be routed to the "default PSAP" rather than to the geographically appropriate PSAP for a customer's Registered Location. Vonage believes it may take until June 30<sup>th</sup> to gather, input, and test the data to provide i2 service to all of these customers.<sup>4</sup>

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<sup>2</sup> Today Vonage received a letter from Level 3 requesting that it cease 911 call routing based on ANI and route only via the Emergency Service Query Keys (ESQKs). Thus, the practice of routing to default PSAPs will change.

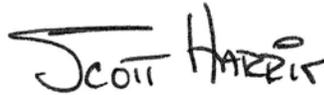
<sup>3</sup> *Id.* Vonage also notes that "default" 911 routing could be almost entirely avoided in the interim if Master Street Address Guide ledger information, ESQKs and Emergency Service Numbers were assigned to all PSAPs for the delivery of VoIP 911 traffic.

<sup>4</sup> *Id.* One of the primary challenges Vonage is facing with respect to customers in this class is that wireline requirements for dispatch boundary designation (Emergency Service Numbers or ESNs) are different from the

- For 3.6% of its customers, Vonage currently lacks direct trunk connectivity to the appropriate Selective Router. Vonage is currently either gathering necessary information (such as which PSAP will handle after-hours and weekend calls from VoIP customers if not all PSAPs behind the Selective Router are 24x7x365) to order trunk connectivity to these Routers – or having ordered trunks is awaiting their installation. In certain instances, Vonage’s ability to order trunk connectivity is delayed indefinitely because the ILEC is unable to define the “default PSAP” for routing purposes and there are no PSAPs willing to volunteer for this designation. Vonage currently routes calls from these customers to its 24x7x365 call center staffed with APCO-33 trained call takers.

These numbers update and expand upon those provided by Vonage in its *ex parte* letter in the above-captioned dockets on 1 March 2006. In accordance with FCC rules, we ask that a copy of this letter be filed in the above-captioned dockets.

Sincerely yours,

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is written in a cursive style with capital letters.

Scott Blake Harris  
Bruce Gottlieb  
*Counsel to Vonage America, Inc.*

cc: meeting participants

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wireless-like model Vonage has deployed nationwide. The current commercial offerings available from the VPC community do not support multiple ESNs.