

23 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

Dear Ms. Dortch:

On behalf of Vonage America, Inc. (“Vonage”), I am submitting this letter updating the status of Vonage’s efforts to provide E911 services to all of its customers. This letter updates the information provided in Vonage’s *ex parte* filed on 14 March 2006.

For the purposes of 9-1-1 services, Vonage’s customers can currently be grouped as follows:

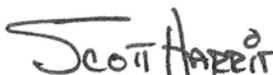
1. For 65.7% of its customers, Vonage provides the full suite of E911 service pursuant to NENA’s i2 standard. This means that all such 911 calls are delivered via the native 911 network to the geographically appropriate PSAP and the PSAP is able to access both call back information (“ANI”) and location 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.
2. For 2.3% of its customers, Vonage 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 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.
3. For 4.3% of its customers, Vonage 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.

4. For 10% 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.
5. For 14.3% 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.
6. For 3.4% of its customers, Vonage lacks direct trunk connectivity to the appropriate Selective Router. Vonage is currently attempting to gather the necessary information to order trunk connectivity to these Routers – or, having ordered trunks, is awaiting their installation.

Until the end of last week, 9-1-1 calls from customers in categories 3, 4 and 5, above, were -- as an interim measure -- routed to the appropriate Selective Router with customer call back information. As the Commission knows, however, such calls often were routed to the “default PSAP” rather than to the geographically appropriate PSAP for a customer’s Registered Location. Vonage has now ceased routing any 9-1-1 calls in this fashion. Instead, most 9-1-1 calls in categories 4 through 6, above, are routed to Vonage’s 24x7x365 call center staffed with APCO-33 trained call takers where they are transferred (in what is called a “warm handoff”) to the appropriate emergency call center. The only exceptions are in those jurisdictions where the PSAP has established a special 10-digit emergency call number (as distinct from an administrative number) for VoIP 9-1-1 calls and has asked that such 9-1-1 calls be routed to that number. Vonage wishes to emphasize that this is only an interim solution as it works to provide full E9-1-1 service.

Finally, Vonage has just issued the attached statement on its interim 9-1-1 routing arrangements to state 9-1-1 authorities and, for the sake of completeness, wishes to bring it to the attention of the Commission.

Sincerely yours,



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

cc: Daniel Gonzalez  
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**Vonage Interim Methods for Routing 911 Phone Calls:  
That Are Not NENA i2 Standard Capable  
March 24, 2006**

Vonage is supporting the implementation of Enhanced 9-1-1 (“E9-1-1”) throughout the nation. It is the intent of Vonage to deploy E9-1-1 for every Vonage subscriber. At present more than 65 percent of Vonage customers have E9-1-1 under the guidance of the NENA i2 standard. This means that all such 9-1-1 calls are delivered via the native 9-1-1 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. Just over two percent of Vonage customers receive voice-only 9-1-1 service as the PSAP that serves these customers is not capable of handling location and/or call back information. Calls are delivered via the native 9-1-1 network to the geographically appropriate PSAP. The PSAP, however, does not have automatic access to the caller’s call back or location information given the PSAP’s current technical capability.

Until late last week, Vonage routed most other 9-1-1 calls from its customers to the native 9-1-1 network based on available ANI and where available Emergency Service Query Keys (ESQKs). We believed this interim method was more acceptable to the public safety community than other alternative 9-1-1 routing mechanisms, even though this led to many “record-not-found” calls or calls being sent to “default” PSAPs. Beginning late last week, following issuance of the NENA statement on VoIP E-91-1 Implementation<sup>1</sup>, Vonage moved away from this routing mechanism. For most customers where Vonage is unable to provide E9-1-1 service or voice-only 9-1-1 service to the geographically appropriate PSAP, 9-1-1 calls will be routed to Vonage’s Safety Net Call Center. Therefore, Vonage 9-1-1 calls without a shell record, ESQK and available i2 features will be received 24x7x365 by APCO-33 trained call takers for a warm transfer to the appropriate emergency responder. In those jurisdictions where the PSAP has established a special 10-digit emergency call number (as distinct from an administrative number) for VoIP 9-1-1 calls – and has asked that such 9-1-1 calls be routed to that number -- Vonage routes 9-1-1 calls to that special 10-digit emergency call number.

It is the goal of Vonage to provide the full suite of available i2 features for all 9-1-1 callers. Until we achieve this goal, however, Vonage is working with the public safety community on interim methods beyond the Vonage Safety Net Call Center. Working with the 9-1-1 system integrators, Vonage has developed a series of alternatives to provide limited native 9-1-1 network calling. These alternatives offer the ability to route calls to the appropriate PSAP and require a PSAP to provision a shell record with an assigned ESQK. Vonage will contact 9-1-1 authorities and PSAPs where these alternatives are possible.

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<sup>1</sup> NENA Statement on VoIP E9-1-1 Implementation Issues, March 6, 2006