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April 21, 2006

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

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

Dear Ms. Dortch:

AT&T submits this letter to update the Commission on AT&T's plans to deploy its "Voice DNA" IP-enabled business service. AT&T's Voice DNA service, also called IP Centrex, is an advanced VoIP service designed for business customers, which combines voice and data communications on a single network, giving subscribers personalized control, powerful web-based user portals, simplified management, potential cost savings and advanced applications. Among other things, Voice DNA allows business customers to make calls to, and receive calls from, both the public switched telephone network and other VoIP services.

AT&T's Voice DNA service supports two different types of access arrangements: AT&T Managed Transport and AT&T Broadband Access. The Managed Transport arrangement is designed primarily for businesses with local area networks (e.g., at a corporate campus). With the Managed Transport arrangement, end users connect to their corporate LAN, which is then connected to AT&T's Voice DNA platform through dedicated routers. The Broadband Access arrangement is designed for businesses that want to enable their end users to access Voice DNA service through a broadband connection over the publicly accessible Internet (e.g., an end user working from a remote location). Using such a broadband connection, the end user connects to the AT&T Voice DNA platform.

When entering into an agreement with AT&T for Voice DNA, Managed Transport customers are required to identify the various sites at which Voice DNA is to be provisioned. Before provisioning the Managed Transport arrangement, AT&T ensures that 911 service to each of the customer's registered locations is available and that sufficient trunking to the applicable Public Safety Answering Points ("PSAP") is in place. AT&T also enters the necessary automatic location information ("ALI") records for each customer registered location into the relevant ALI database for the responsible PSAP. Once Voice DNA is provisioned for Managed Transport users, those users are free to access the service at any of the customer's other registered locations. When an end user connects his or her IP phone at another registered location, the Voice DNA network automatically recognizes this change and routes any 911 calls

to the PSAP that serves the new location. Thus, there is no need for the end user to manually update his or her location information when moving between registered locations. Because Managed Transport end users cannot connect to Voice DNA service from anywhere other than a registered location, nomadic use is therefore not currently available for these end users.

In the Broadband Access arrangement, end users connect to the Voice DNA service using a broadband connection, such as DSL or cable modem service. AT&T requires Voice DNA customers using the Broadband Access arrangement to identify the address of each site at which Voice DNA is to be provisioned. Before provisioning service to any registered location with a Broadband Access arrangement, AT&T ensures that E911 service is available for that registered location and that sufficient trunking to the applicable PSAP is in place. AT&T also enters the necessary ALI records for each registered location into the relevant ALI database for the responsible PSAP.

At the present time, AT&T's Broadband Access arrangement for Voice DNA is designed as a fixed location service and is available only at the customer's registered location (e.g., an end user's home office).[1] The Broadband Access arrangement employs a "Heartbeat" type application that can detect when the end user's customer premises equipment has been powered down, which may indicate that the end user has moved to a new location.[2] When the AT&T Voice DNA network detects a possible relocation, it suspends the end user's outbound service (except for 911 and 8YY calls) until the end user responds to a network inquiry seeking confirmation of the end user's location. If the end user reports that the equipment is still at the registered location, the network restores full service to the end user. If the end user reports that the equipment has been moved to another location, AT&T Voice DNA service remains suspended.

AT&T supports the Commission's efforts to ensure that VoIP services are offered with 911 capabilities and, as described above, it will make 911 service available to all of its Voice DNA registered locations in a manner which AT&T believes meets or exceeds the Commission's VoIP 911 rules. AT&T looks forward to working with the Commission and other public safety stakeholders to address the challenges of providing 911 service as communications technologies continue to evolve.

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[1] To the extent that AT&T offers a nomadic version of Voice DNA service in the future, we will do so in compliance with the Commission's 911 requirements for nomadic VoIP services.

[2] This condition can also occur when the end user has turned off power to the equipment or when there has been a failure of broadband service or electrical power.

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

cc: Thomas Navin