



Jack Zinman
General Attorney

AT&T Services, Inc.
1401 I Street NW, Suite 400
Washington, D.C. 20005
Phone 202 326-8911
Fax 202 408-8745

May 10, 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 Inc. (AT&T) submits this letter to update the Commission on its plans for a new Voice over Internet Protocol (VoIP) service associated with Project Lightspeed. Project Lightspeed is an AT&T initiative that will bring a suite of advanced IP-based voice, video and Internet access services to residential customers through a mix of fiber-to-the-node and fiber-to-the-premises technologies.¹ The new consumer VoIP service (which likely will be branded AT&T “U-verse Voice”) will, among other things, enable subscribers to make calls to, and receive calls from, the public switched telephone network. AT&T U-verse Voice will also enable subscribers to make calls to, and receive calls from, customers of other VoIP services.

When requesting U-verse Voice from AT&T, a prospective subscriber will be required to identify the registered location where he or she seeks service (e.g., a house or apartment building). In the course of provisioning U-verse Voice for a subscriber, AT&T will deploy 911 service to the subscriber’s registered location by obtaining the necessary trunking to the appropriate selective routers and making arrangements with the appropriate Public Safety Answering Points (PSAPs) for the delivery of VoIP traffic. AT&T will also enter an automatic location information (ALI) record for the U-verse Voice subscriber’s registered location, which will be validated against the relevant Master Street Address Guide (MSAG), into the relevant ALI database for later retrieval by ALI-capable PSAPs. In addition, we intend to MSAG validate the ALI records for our AT&T U-verse Voice subscribers in a manner consistent with standard wireline E911 provisioning practices.²

¹ See Project Lightspeed website at <http://www.sbc.com/gen/press-room?pid=5838>.

² Under these standard wireline practices, there is a brief interval (typically lasting no more than one or two business days) during which some new subscribers temporarily receive E911 service with ANI capability, but without ALI capability, while their ALI records are being processed for validation and entry into the relevant ALI database. See *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd. 10245, ¶ 48 n.155 (2005) (acknowledging the “delays that may occur in making a Registered Location available in or through the ALI database”); Texas Admin. Code Title 16, § 26.433(f)(1)(A) (requiring certified telecommunications utilities to perform MSAG validation, but stating that

AT&T intends to offer U-verse Voice initially as a non-nomadic service. Specifically, due to the way in which the Project Lightspeed network will be designed and the manner in which VoIP-related customer premises equipment will be configured to interface with that network, a subscriber will be permitted to access AT&T U-verse Voice service only at the subscriber's registered location. Thus, AT&T U-verse Voice will not enable a subscriber to use his or her VoIP-related customer premises equipment over a broadband connection from a non-registered location.³

AT&T supports the Commission's efforts to ensure that VoIP services are offered with 911 capability and, as described above, we plan to deploy 911 service to all of our AT&T U-verse Voice subscribers in a manner that we believe meets or exceeds the Commission's VoIP 911 rules. We look 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.

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: Tom Navin
Julie Veach

MSAG validation "shall not be construed as a basis for denying installation of basic telephone service"); Intrado Comments, WC Docket No. 05-196, at 2 (Aug. 15, 2005) ("Wireline providers are not required to provide location information to the PSAP if an MSAG-validated address is unavailable during E911 provisioning."); Letter from James Hobson, NENA, to Marlene Dortch, FCC, WC Docket No. 05-196, at 2 (March 9, 2006) (MSAG validation for VoIP should be "equivalent to wireline treatment").

³ To the extent AT&T later offers U-verse Voice with nomadic capability, we will do so in compliance with the Commission's VoIP 911 rules governing nomadic VoIP services.