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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:

On behalf of AT&T Inc. (AT&T), I am submitting this letter detailing our compliance with the Commission's 911 requirements for interconnected Voice over Internet Protocol (VoIP) services, specifically AT&T CallVantage® Service,<sup>1</sup> per AT&T's October 7, 2005 *ex parte* letter<sup>2</sup> and the Commission's June 3, 2005 *VoIP 911 Order*.<sup>3</sup>

In its October 7, 2005 *ex parte*, AT&T explained the steps that it would undertake in the event that it was not able to provide E911 service to 100% of its customer base. As part of that filing, AT&T committed to stop accepting new customers in areas where it cannot provide E911 service, to make voluntary contributions to a public safety organization for grandfathered customers until AT&T can provide those customers with E911 connectivity, and to implement any new commercially reasonable technological solutions to expand its E911 footprint throughout the country.

As of April 30, 2006, approximately 82% of AT&T CallVantage customers have Enhanced 911 (E911) and less than 1% have Basic 911 (911).<sup>4</sup> This latter category is limited to

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<sup>1</sup> AT&T CallVantage Service is actually provided to subscribers by an AT&T affiliate; for simplicity, however, in this letter, we refer to AT&T CallVantage as being provided by AT&T.

<sup>2</sup> See Letter from Robert W. Quinn, Jr., AT&T, to Marlene H. Dortch, FCC, WC Docket No. 05-196 (Oct. 7, 2005) (AT&T October 7, 2005 *ex parte*).

<sup>3</sup> *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 (2005) (*VoIP 911 Order*).

<sup>4</sup> Some AT&T CallVantage Service customers have more than one telephone number associated with their service. Although this letter refers to subscribers or customers, customer data in this paragraph are computed on a telephone number basis.

areas where only Basic 911 is offered by the public safety answering point (PSAP). The remaining 18% of customers are provided with Alternative 911 (A911) and will continue to be served with A911 on a “grandfathered” basis. AT&T expects to be providing E911 service to approximately 97% of its November 28, 2005 AT&T CallVantage customer base in third quarter 2006, but will still have approximately 3% of those subscribers who live in areas where AT&T will not at that time be capable of providing an E911 solution. AT&T is continuing to work internally and with external vendors to seek alternative technologies and solutions to reach 100% compliance as soon as possible. In the meantime, AT&T is making monthly voluntary contributions to the Public Safety Foundation of America for all grandfathered AT&T CallVantage customers.

In addition to broadening the availability of E911 service, we have also taken steps to address the nomadic use of AT&T CallVantage Service. Specifically, AT&T’s “Heartbeat Solution” enables customers to obtain proper 911 routing when they use AT&T CallVantage Service nomadically within AT&T’s 911-capable footprint, and only enables service at locations where AT&T can provide 911 capabilities.<sup>5</sup>

As discussed in AT&T’s prior filings, we discovered that due to systems errors by AT&T and provisioning errors by one of AT&T’s VoIP E911 vendors, a relatively small number of subscriber orders were accepted for new service in areas that were not VoIP E911-enabled.<sup>6</sup> As a result of the errors, these subscribers were activated between December 2005 and February 2006 with A911 service instead of E911 service.<sup>7</sup> To ensure that provisioning is conducted consistent with the Commission’s rules and our 911 commitments, AT&T conducted a comprehensive review of our provisioning systems. Based on that review, we instituted new checks and balances in our systems and we worked closely with our VoIP 911 vendor to enhance the coordination between our companies’ respective 911 systems and processes.<sup>8</sup>

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<sup>5</sup> AT&T’s technical solution for nomadic subscribers was described in detail in its October 7, 2005 *ex parte*.

<sup>6</sup> See Letter from Jack Zinman, AT&T, to Marlene Dortch, FCC, WC Docket No. 05-196 (April 19, 2006) (AT&T April 19, 2006 *ex parte*).

<sup>7</sup> Aside from the A911 subscribers previously identified by AT&T in our prior filings, we discovered one additional A911 subscriber that we thought had been transitioned to E911 service when, in fact, the subscriber is still receiving A911 service. The misclassification of this subscriber was the result of a clerical error, which has been corrected. Pursuant to the procedures discussed in our prior filings for misprovisioned A911 customers, we have informed the subscriber that, because we were unable to provide him with E911 service, AT&T plans to transition him to an alternative service offering within approximately 30 days, and we would refund all amounts the subscriber has paid for AT&T CallVantage service. In the event the subscriber does not transition to an alternative service offering, we would institute a call intercept procedure to suspend outbound AT&T CallVantage service (except for 911, 411 and 8YY calls) until the subscriber makes such a transition. See AT&T April 19, 2006 *ex parte* at 2-3.

<sup>8</sup> See AT&T April 19, 2006 *ex parte* at 3.

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: Daniel Gonzalez  
Michelle Carey  
Thomas Navin  
Kathryn Berthot  
Janice Myles