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May 22, 2006

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: IP E9-1-1 services, WC Dockets 04-36, 05-196
Ex parte communication pursuant to Section 1.1206.

Dear Ms. Dortch:

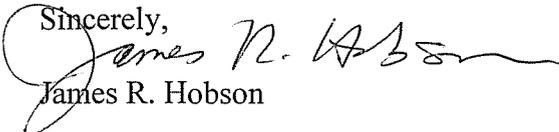
On Friday, May 19, 2006, President David Jones, Technical Issues Director Roger Hixson and Government Affairs Director Patrick Halley of the National Emergency Number Association ("NENA"), plus the undersigned as counsel, met with Tom Navin and Jennifer Veach to discuss the appended slides illustrating types of 9-1-1 and enhanced 9-1-1 ("E9-1-1") service. We stressed particularly the distinctions between "basic 9-1-1" and "partial E9-1-1."

We explained our concern over possible confusion between the term "basic 911 service" as presently defined for the wireless context in Section 20.18(b) of the FCC's rules and a different definition, in the VOIP context, contained in a draft revision to S.1063. We also discussed the possible drawbacks in legislative descriptions of covered VOIP service as offerings rendered "for a fee."

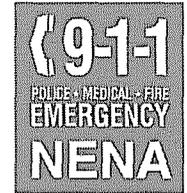
NENA reiterated its support for the FCC's existing VOIP E9-1-1 rules and for pending legislation that would extend liability protection and greater funding opportunities to Public Safety Answering Points ("PSAPs").

Please direct any questions to the undersigned.

Sincerely,


James R. Hobson

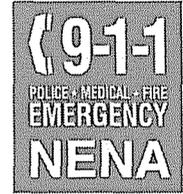
National Emergency
Number Association



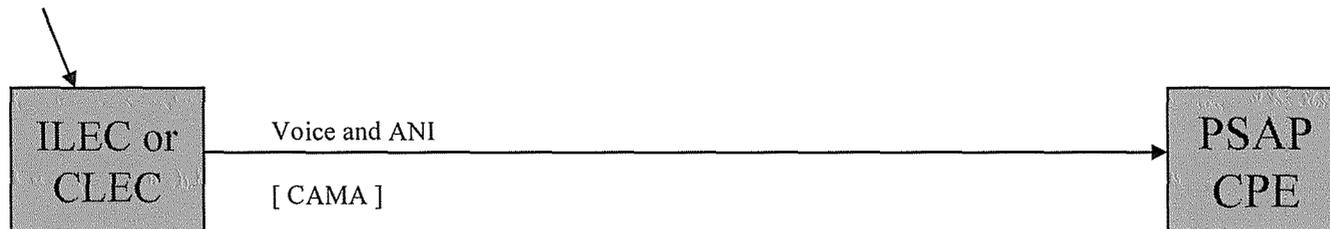
VoIP and E9-1-1

Forms of Service

Basic 9-1-1

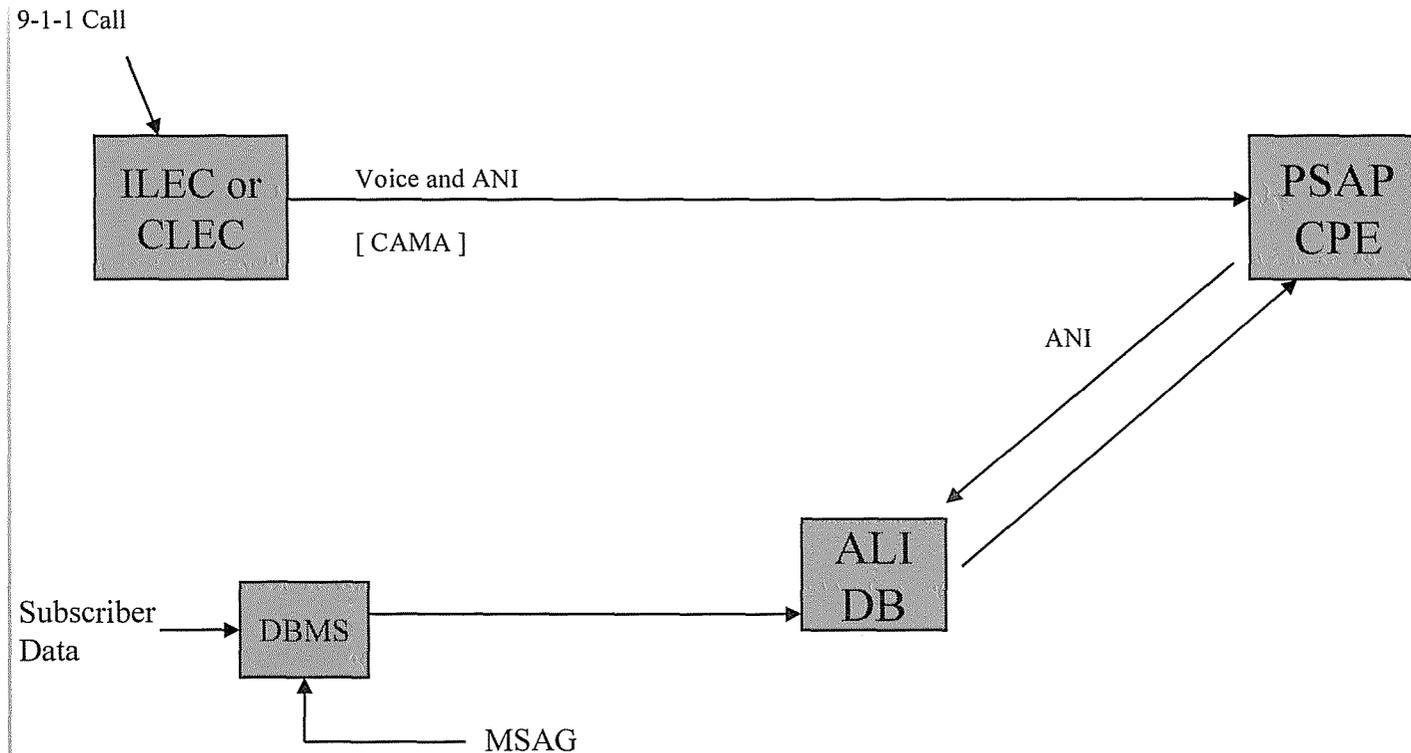
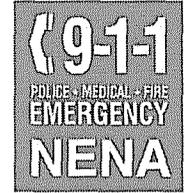


9-1-1 Call

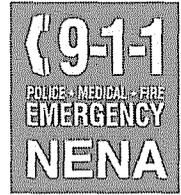


All calls from each originating switch direct trunked to common PSAP

Basic 9-1-1 with ALI

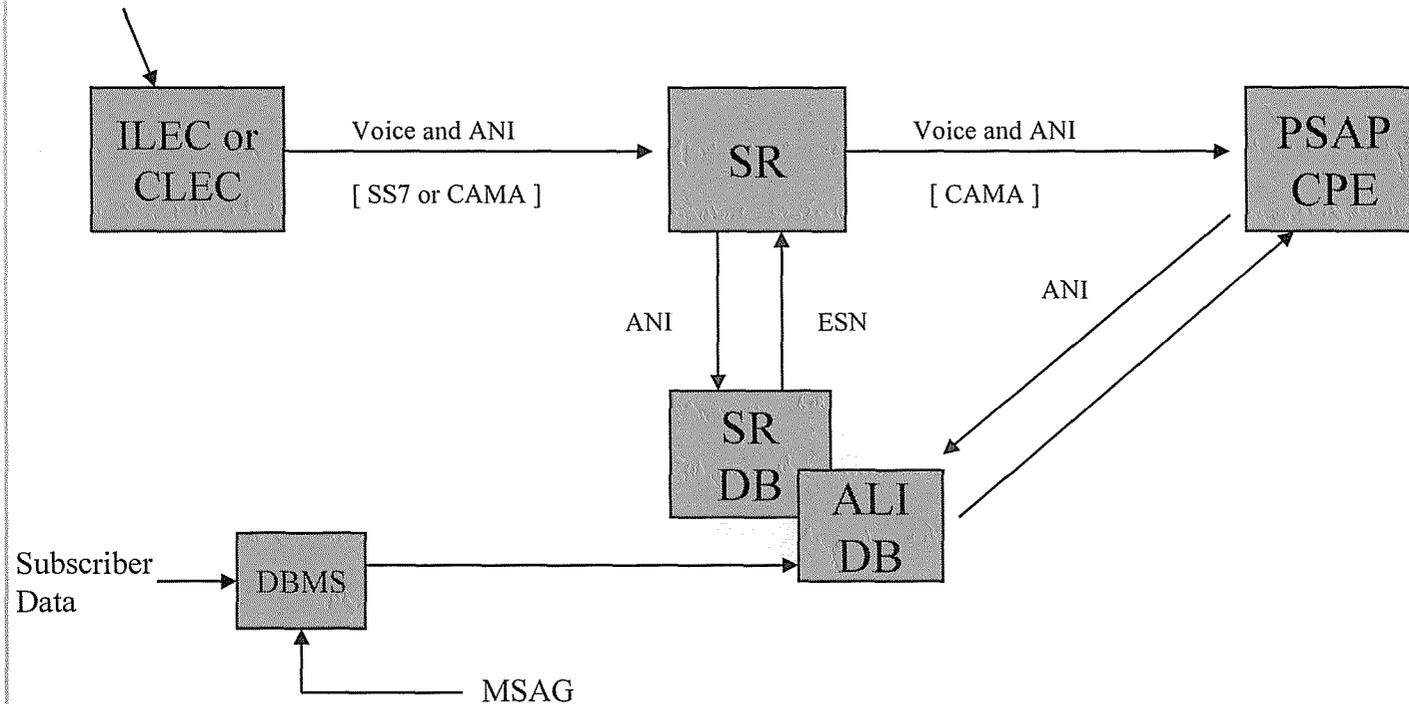


All calls from each originating switch direct trunked to common PSAP with ALI



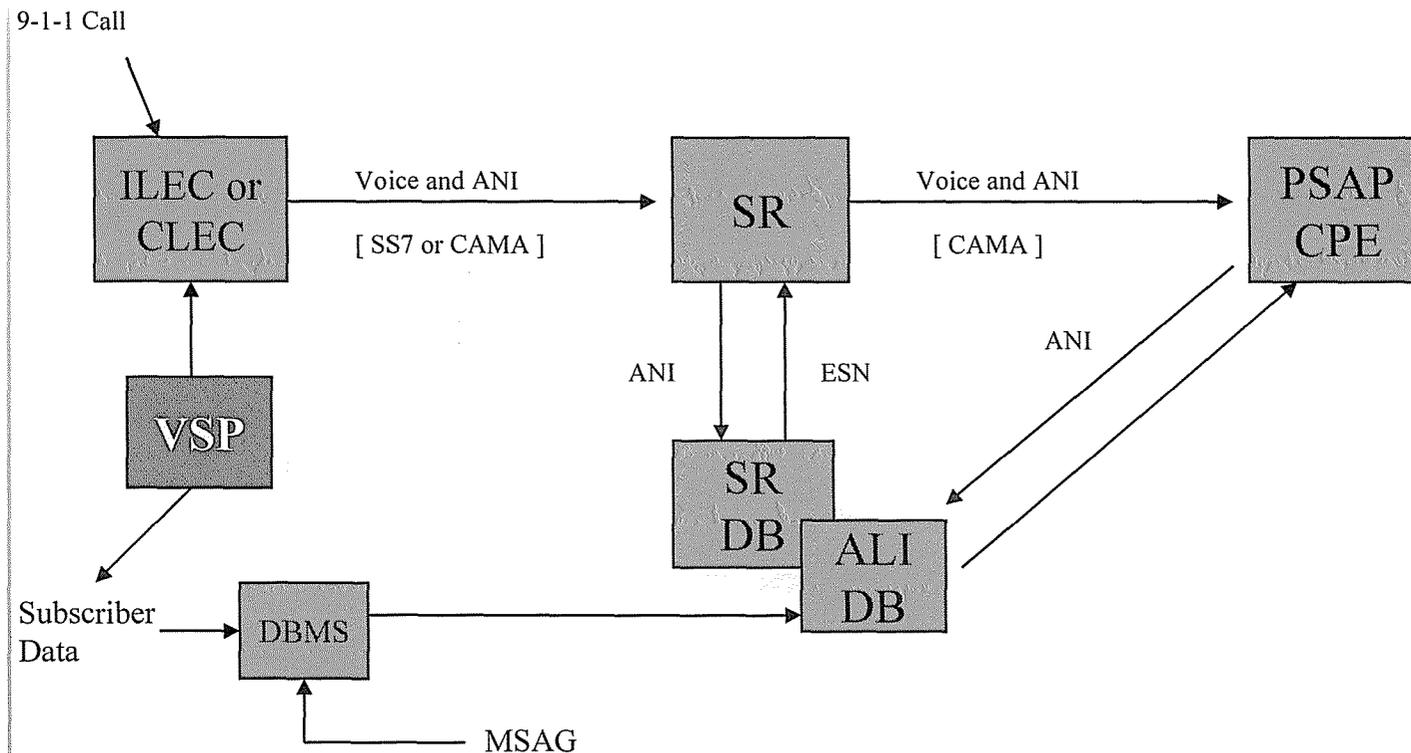
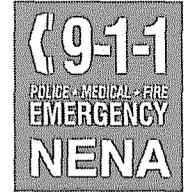
E9-1-1 Call Routing

9-1-1 Call



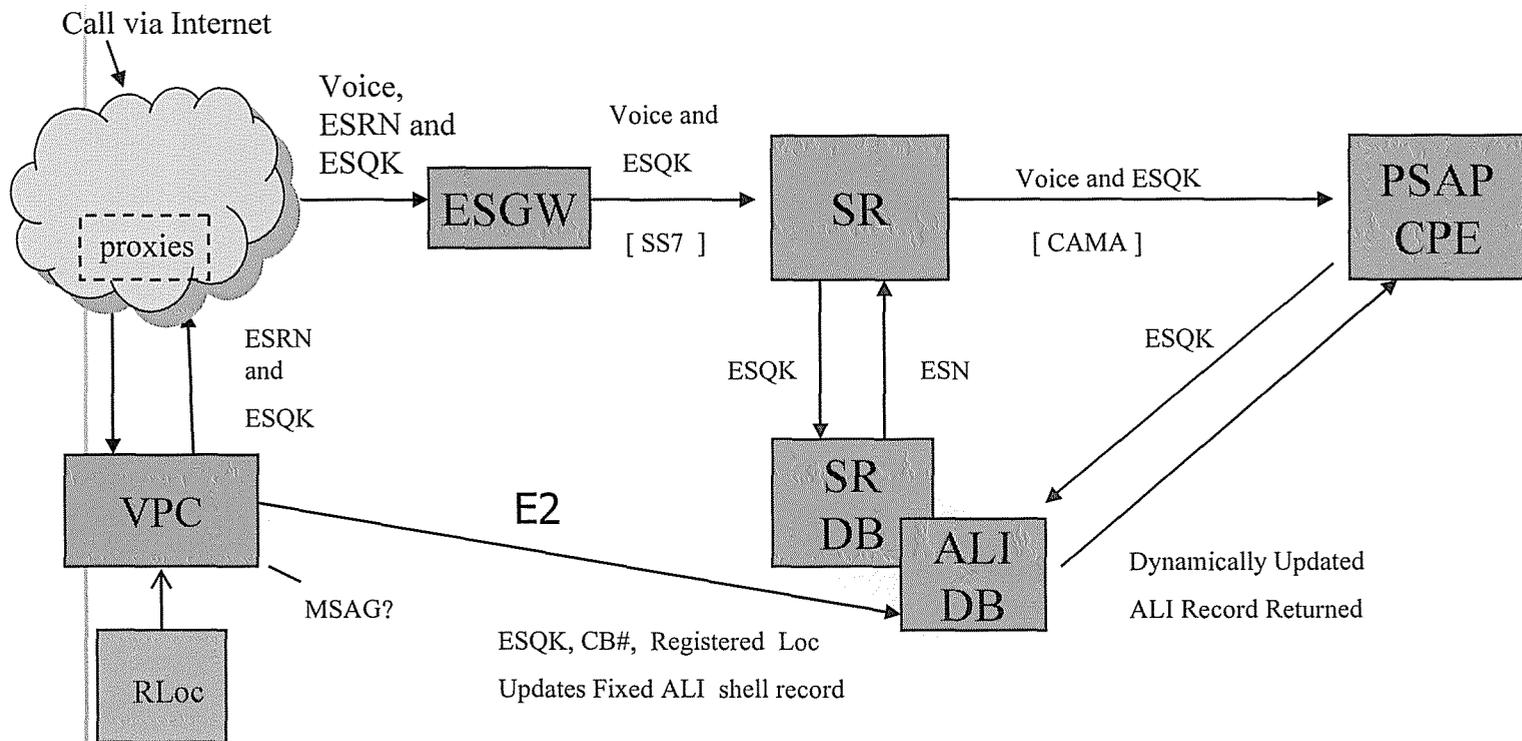
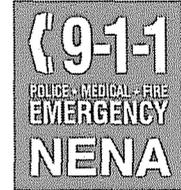
Each call selectively routed to geographically appropriate PSAP, with ALI

VoIP E9-1-1 Call Routing (using non-Internet IP network)



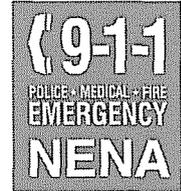
Each call selectively routed to geographically appropriate PSAP, with ALI

Voice over Internet E9-1-1 Service (full FCC Order version)

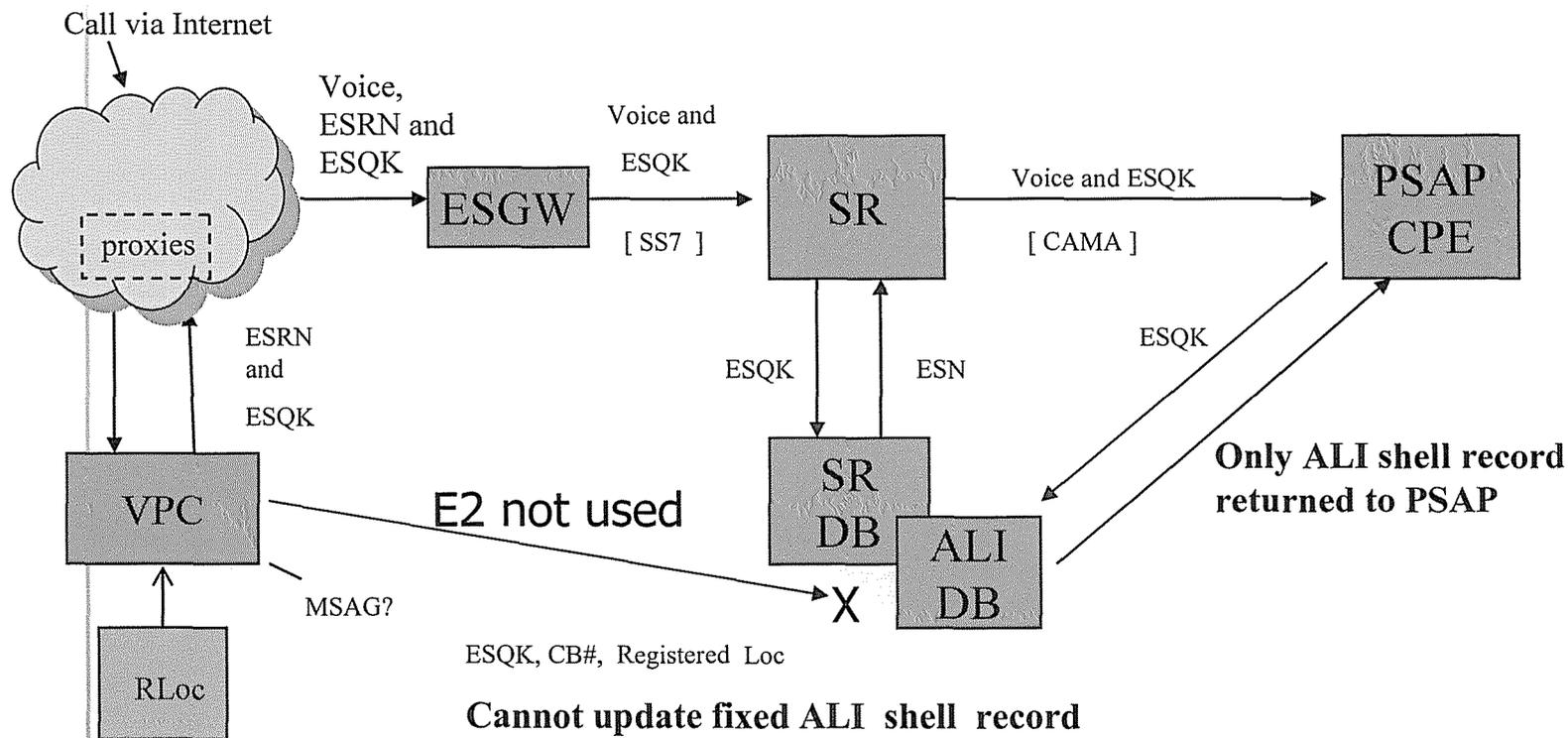


Each call selectively routed to geographically appropriate PSAP, with ALI

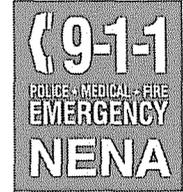
Voice over Internet E9-1-1 Service (partial E9-1-1 w/o full ALI)



Each call selectively routed to geographically appropriate PSAP, w/o full ALI
 This is through the E9-1-1 system, and is a form of E9-1-1 (not basic 9-1-1)



9-1-1 call routing to the appropriate PSAP is already done based on the ESRN, ESQK, and the ESQK shell record ESN set by the MSAG match process. Only the ESQK (pseudo-ANI) delivered to the PSAP equipment affects the query for ALI - if the dynamic data is not available, only the shell record content is displayed.

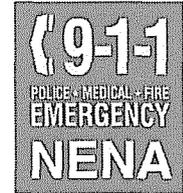


The Previous Info describes `pre-i2`

Pre-I2: provides E9-1-1 System interface for local NPA,
fixed subscribers (wireline replacement)

- Handle non-local TNs using wireless-like methods
- Can handle nomadic if subscriber updates their location address, but with an in-service time delay
- Via cable provider or CLEC interfaces into E9-1-1
- May have MSAG validation through a service order-type data interface
- Does not support VoIP mobility
- Does not support MSAG validation and routing control distributed architecture of full Interim Solution (i2)

Definitions



ESRN - Emergency Service Routing Number

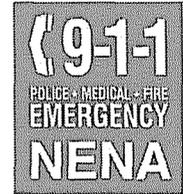
ESRK - Emergency Service Query Key

'i2' is the development short hand term for NENA's **08-001 Interim VoIP Architecture for Enhanced 9-1-1 Services (i2)**

URL:

<http://www.nena.org/pages/Content.asp?CID=76&CTID=5>

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