

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matters of	)	
	)	
IP-Enabled Services	)	WC Docket No. 04-36
	)	
E911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196
	)	

**UPDATE TO PETITION FOR EXTENSION OF TIME AND LIMITED WAIVER**

On November 28, 2005 Cypress Communications, Inc. (“Cypress” or “Petitioner”), pursuant to Section 1.3 of the Federal Communications Commission (“FCC” or “Commission”) Rules, 47 C.F.R. §1.3, filed a Petition for Extension of Time and Limited Waiver<sup>1</sup> (“Waiver Petition”) of Commission Rule 9.5(b). Cypress provides this update to that Waiver Petition to advise the Commission of the current status of the factual circumstances underlying the original Waiver Petition and to request an additional six month extension of time to comply with Rule 9.5(b).

In the Waiver Petition Cypress sought limited waiver of, and an extension of time to comply with, the E911 service requirements of Rule 9.5(b) with respect to certain of Cypress’s voice over Internet protocol (“VoIP”) service subscribers. Cypress has contracted with New Global Telecom (“NGT”) for the E911 services necessary to provide fully-compliant E911 service to its subscribers, but because Intrado Inc. (“Intrado”), NGT’s underlying provider, has not yet deployed its E911 service on a nationwide basis, Cypress cannot yet provide fully-compliant E911 service to all of its subscribers.

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<sup>1</sup> Petition for Extension of Time and Limited Waiver, WC Docket Nos. 04-36, 05-196 (filed Nov. 28, 2005) (“Waiver Petition”).

In the Waiver Petition Cypress stated that it provided fully-compliant E911 service to 93% of its subscribers and was working to provide E911 service to the remaining 7% of its subscribers. Cypress has since acquired nine additional subscribers in locations where it does not provide E911 service. It has also come to Cypress's attention that NGT was not able to provide E911 coverage to another eight subscribers that Cypress believed did receive fully-compliant E911 service. As a result, Cypress currently provides fully-compliant E911 service to approximately 87% of its 210 VoIP subscribers but will be unable to provide fully-compliant E911 service to the remaining approximately 13% of its subscribers until NGT deploys its E911 service in the areas where those subscribers are located. As Cypress noted in its Waiver Petition, it has made arrangements to provide the 28 subscribers in those areas where it does not provide fully-compliant E911 service with access to emergency services.<sup>2</sup>

It is Cypress's understanding that, within the next two months, Intrado will deploy its services in the areas where Cypress currently is unable to provide fully-compliant E911 services,<sup>3</sup> thereby enabling Cypress to provide the required E911 service to those subscribers. Nonetheless, in an abundance of caution and to account for any unexpected delays in Intrado's

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<sup>2</sup> Waiver Petition at 7.

<sup>3</sup> *See, e.g.*, Intrado Major Market Rollout <http://www.intrado.com/main/productservices/government/voipdeployment/voipdeploymentpage/>.

implementation schedule, Cypress seeks an additional six month extension of time and continued limited waiver of the E911 service requirements of Commission Rule 9.5(b).

Respectfully submitted,



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