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9 June 2006

Ex Parte

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

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

Dear Ms. Dortch:

On behalf of Vonage America, Inc. ("Vonage"), we are submitting this letter updating the status of Vonage's efforts to provide E911 service to all of its customers. This letter updates the information provided in Vonage's *ex parte* filed on 26 May 2006 and reflects Vonage's continuing progress in this effort.[1]

Vonage's Current 911 Deployment Status

For the purposes of 9-1-1 services Vonage's customers can currently be grouped as follows:[2]

1. For 79.9% of its customers, Vonage provides the full suite of E911 service pursuant to NENA's i2 standard. This means that all such 911 calls are delivered via the native 911 network to the geographically appropriate PSAP and the PSAP is able to access both call back information ("ANI") and location information ("ALI") for that customer. In order to provide this service, Vonage uses the database services of two VoIP Position Center ("VPC") subcontractors – Tele-Communications Systems ("TCS") and Intrado.

2. For .8% of its customers, Vonage provides voice-only 911 service because the PSAP that serves these customers' Registered Location is not capable of handling location and/or

[1] In addition to providing 911 service to existing customers as described above, *Vonage can provide the full suite of E911 service pursuant to NENA's i2 standard to 802 additional PSAPs* that do not currently serve any Vonage subscribers.

[2] Because of the time necessary to add new subscriber information to Vonage's coverage database, these updated percentages reflect changes in the 911 coverage status of those subscribers added by 30 April 2006. However, Vonage's experience has been that the 911 coverage status of new subscribers is essentially identical to the 911 coverage status of its existing subscribers, and that the inclusion of new subscribers does not materially change the cumulative 911 coverage status percentages. Vonage will add new subscriber information to its coverage database on a monthly basis and will advise the Commission as it does so.

call back information. In other words, for these customers, Vonage delivers their 911 calls via the native 911 network to the geographically appropriate PSAP and the PSAP is able to conduct a two-way conversation with the caller.

3. For 2.0% of its customers, Vonage has 3rd party direct trunk connectivity to the appropriate Selective Router, and has gathered and processed all the necessary data inputs from the relevant ILECs and/or PSAPs to provide full E911 (*i.e*, i2) service, but has not yet completed certain necessary system testing. Vonage anticipates completing these tests within 5 to 45 days, at which time it will be able to offer these customers the full suite of E911 services supported by the i2 standard.

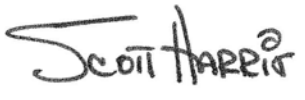
4. For 3.2% of its customers, Vonage currently has 3rd party direct trunk connectivity to the appropriate Selective Router and has gathered all the necessary data inputs from the relevant ILECs and/or PSAPs to provide full E911 (*i.e.*, i2) service, but the ILECs and VPCs have not yet loaded the data into their respective databases. The necessary system testing is scheduled upon completion of this data load.

5. For 12.0% of its customers, Vonage currently has 3rd party trunk connectivity to the appropriate Selective Router but is in the process of gathering the necessary data to provide E911 service from the relevant ILECs and/or PSAPs.

6. For 2.1% of its customers, Vonage lacks direct trunk connectivity to the appropriate Selective Router. Vonage is currently attempting to gather the necessary information to order trunk connectivity to these Routers – or, having ordered trunks, is awaiting their installation.

If there is any information set forth, above, that is unclear – or if the Commission needs additional information – please do not hesitate to let us know.

Sincerely yours,



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