

13 July 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 services to all of its customers. This letter updates the information provided in Vonage’s *ex parte* filed on 12 June 2006. Vonage now provides the full suite of E911 service pursuant to NENA’s i2 standard to more than 80% of its subscriber lines.¹

In addition, we thought it might be useful to bring to the Commission’s attention problems Vonage faces achieving E911 coverage in areas where AT&T is the ILEC. In the Verizon, Bell South, and Qwest territories, Vonage has achieved E911 coverage for 90% or more of its subscriber lines. In the AT&T territory, however, Vonage has achieved E911 coverage for only 60% of its subscriber lines. This substantial disparity is not an accident. AT&T has failed to live up to the Commission’s expectation that “all parties involved . . . work together to develop and deploy VoIP E911 solutions.”²

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 900 additional PSAPs that do not currently serve any Vonage subscribers.*

² *IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245, 10269 (rel. June 3, 2005).

Vonage's Current 911 Deployment Status

For the purposes of 9-1-1 services Vonage's customers can currently be grouped as follows:³

1. For 80.3% 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 .6% 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 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 1.3% 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 4.5% 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 11.2% 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.

³ 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 June 7, 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 continue to update the Commission as it does so.

Vonage's Experience in AT&T Territory

Vonage is committed to deploying a nationwide E911 system for its customers as quickly as it can, and has devoted significant resources towards that goal. This is a complicated, expensive, and difficult process, and one that Vonage cannot complete without the cooperation of numerous third parties, including ILECs, PSAPs, and state and local entities. In much of the country, Vonage has enjoyed steady progress and has been able to secure needed cooperation from third parties.

In the AT&T territory, however, Vonage has been unable to achieve similar success. There is no single reason for this difficulty – instead, the obstacles Vonage has faced are as varied and complicated as the E911 deployment process itself. For example:

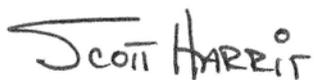
- In the former Ameritech states (Indiana, Illinois, Michigan, Ohio and Wisconsin), and the “MOKA” region (Missouri, Oklahoma, Kansas, and Arkansas), AT&T has consistently refused to provide (or even to confirm) basic E911 information. AT&T has, for example, refused to provide or confirm PSAP geographic boundaries, technical requirements and database capabilities, even though this information should be readily available to AT&T for the many PSAPs for which it is the 911 System Service Provider. As a result, in some instances, Vonage has been forced to seek state regulatory commission intervention to acquire necessary information for PSAPs served by AT&T.
- In California, where the process is largely state-driven, carriers other than AT&T have worked with Vonage to minimize or avoid delay. AT&T, by contrast, has failed to take even small steps to expedite E911 deployment.
- In all areas, AT&T's reliance on laborious technical solutions – such as requiring multiple emergency service numbers, or ESNs – has unnecessarily slowed deployment.

Once Vonage overcomes these initial hurdles, it often faces further AT&T obstacles. Unlike Verizon, for example, AT&T generally requires PSAPs to provide multiple confirmations as part of the E911 deployment process. Even after a PSAP completes AT&T's multi-step confirmation process, AT&T often waits weeks to upload the inputs necessary for the PSAP to test its E911 systems and provide service to Vonage customers. This complicated process – a process unique to AT&T – delays deployment, and often creates PSAP confusion that serves as a further barrier to E911 implementation.

Despite these difficulties, Vonage will continue – and is continuing – to work with all stakeholders to provide E911 service to all of its subscriber lines.

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,

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is written in a cursive style with a large, sweeping initial "S" and a distinct "HARRIS" following.

Scott Blake Harris
Brita D. Strandberg
Counsel to Vonage America, Inc.

cc: Daniel Gonzalez; Michelle Carey; Thomas Navin; Julie Veach; Rene Crittendon; Christi Shewman; Joe Casey; Kathryn Berthot; Chris Olsen; Mike Carowitz; Nicholas Alexander