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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,¹ per AT&T's October 7, 2005 *ex parte* letter² and the Commission's June 3, 2005 *VoIP 911 Order*.³

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 June 30, 2006, approximately 85% of AT&T CallVantage customers have Enhanced 911 (E911) and less than 1% have Basic 911 (911).⁴ This latter category is limited to areas where only Basic 911 is offered by the public safety answering point (PSAP). The remaining 15% of customers are provided with Alternative 911 (A911) and will continue to be

¹ 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.

² 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*).

³ *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*).

⁴ 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.

served with A911 on a “grandfathered” basis.⁵ 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.⁶

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
Julie Veach

⁵ In AT&T’s June 2006 letter updating the Commission on our VoIP 911 deployment efforts, we advised the Commission that we had encountered situations where a subscriber may initially appear to be eligible to receive full E911 service but, due to a subsequent change in rate center or PSAP boundaries, or incorrect geolocation data supplied by a third-party mapping vendor, the subscriber may, in fact, only be able to obtain partial E911 service (E911 with ANI, but without ALI), partial E911 service with calls delivered to a neighboring PSAP, or A911 service. *See* Letter from Jack Zinman, AT&T, to Marlene Dortch, FCC, WC Docket No. 05-196 (June 15, 2006). We advised the Commission that, to the extent that a subscriber receives partial E911 service, AT&T will inform the subscriber of the limits of the service and will work with our 911 vendor to provide full E911 service as soon as practicable. To the extent a subscriber receives partial E911 service with calls delivered to a neighboring PSAP or A911 service, AT&T intended to follow the “transition and suspend process” described in previous filings. Pursuant to that process, we will inform the subscriber of the limitations of the service and that they need to transition to an alternative service offering within approximately 30 days, after which time we would institute a call intercept procedure to suspend outbound AT&T CallVantage service (except for 911, 411 and 8YY calls) if the subscriber has not made such a transition. After further discussions with our VoIP 911 vendor, AT&T intends to modify and unify these procedures. Specifically, to give our VoIP 911 vendor an opportunity to activate E911 service for any of the subscribers described above that receive less than full E911 service as a result of a rate center or PSAP boundary change or incorrect geolocation data, we will institute the “transition and suspend process” after 90 days if our VoIP 911 vendor has not activated full E911 service by that time. AT&T believes this modified procedure will provide a reasonable opportunity to avoid unnecessary service disruptions as we pursue the Commission’s overall goal of widespread VoIP 911 availability.

⁶ AT&T’s technical solution for nomadic subscribers was described in detail in its October 7, 2005 *ex parte*.