

28 July 2006

**Ex Parte**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 13 July 2006. Vonage now provides the full suite of E911 service pursuant to NENA’s i2 standard to 82% of its subscriber lines.<sup>1</sup>

In addition, we provide further information about the difficulties Vonage has faced deploying E911, and clarify that Vonage has no objection to using multiple emergency service numbers (ESNs) when requested to do so by public safety agencies.

**Vonage’s Current 911 Deployment Status**

For the purposes of 911 services Vonage’s customers can currently be grouped as follows:<sup>2</sup>

1. For 82% 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.

<sup>1</sup> 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 927 additional PSAPs that do not currently serve any Vonage subscribers.*

<sup>2</sup> Because of the time necessary to add new subscriber information to Vonage’s coverage database, these updated percentages reflect the 911 coverage status of those subscribers added by July 7, 2006.

2. For .7% 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 1.5% of its customers, Vonage has 3<sup>rd</sup> 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 3<sup>rd</sup> 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 9.3% of its customers, Vonage currently has 3<sup>rd</sup> 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 2.0% 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.

### **AT&T Delays and Vonage Support for Multiple ESNs**

As Vonage previously detailed, it believes it has faced disproportionate difficulties deploying E911 in AT&T territory.<sup>3</sup> Most recently, public safety officials have told Vonage that in certain parts of Wisconsin, Ohio, and Missouri, AT&T has refused to provide PSAPs with connections to its ALI database until it puts in place a new tariff charging for the ALI database. In other words, AT&T will not release this essential element of E911 deployment until it has a mechanism to collect additional money from PSAPs.

In Arkansas, AT&T has refused to allow Vonage to complete connections to selective routers until *all* PSAPs connected to those selective routers approve that connection. AT&T insists on this approval even from PSAPs that do not have a single Vonage customer. This precludes or delays coverage of Vonage customers in other PSAPs connected to the selective router if a PSAP without Vonage customers fails to approve or delays in approving the connection.

---

<sup>3</sup> *Ex Parte* Letter to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 05-196 (filed July 13, 2006).

In its earlier filing, Vonage explained that AT&T has often caused delay by relying on laborious technical solutions, citing multiple ESNs as an example. Vonage wishes to clarify that it has no objection to multiple ESNs wherever the public safety community requests they be used. Vonage's concern, however, is that AT&T, in its role as 911 System Service Provider, has not always supported timely deployment of multiple ESNs, and has not supported or facilitated interim solutions while Vonage completes multiple ESN deployment. By contrast, other ILECs serving as 911 SSPs have worked with PSAPs and Vonage to speed multiple ESN deployment and implement interim E911 service.

As noted before, Vonage is continuing to work with all stakeholders, including some more helpful officials at AT&T, 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, appearing to read 'S. Harris', with a long horizontal flourish extending to the right.

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