

8 September 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 10 August 2006. Vonage now provides the full suite of E911 service pursuant to NENA’s i2 standard, as presently available,¹ to *more than 87.9% of its subscriber lines.*² And it provides basic 911 service to 1.1% of its subscriber lines. Thus, *a total of 89% of Vonage’s subscriber lines receive either basic or enhanced 911 service.*

Vonage’s Current 911 Deployment Status

For the purposes of 911 services Vonage’s customers can currently be grouped as follows:³

¹ NENA’s 08-001 Interim VoIP Architecture for Enhanced 9-1-1 Services, or “i2 standard” calls for a number of technical elements (such as a nationally accessible MSAG databases, an MSAG-based national routing database, and a p-ANI administrator) that are not currently available. Vonage provides the full suite of i2 services that are presently available, and strongly supports NENA, public safety, and industry efforts to implement the remaining elements of NENA’s i2 standard. Vonage’s references to its provision of the full suite of E911 service pursuant to NENA’s i2 standard refers to its provision of all currently-available elements of that standard, and is not meant to imply that Vonage is providing those services or elements of the NENA i2 standard that are not presently available.

² 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, as presently available (see supra note 1) to 1030 additional PSAPs that do not currently serve any Vonage subscribers.*

³ 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 September 1, 2006.

1. For 87.9% of its customers, Vonage provides the full suite of E911 service pursuant to NENA's i2 standard, as presently available.⁴ 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 1.1% 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 1.2% 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.*, presently available i2⁵) 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, as presently available.⁶
4. For 2.3% 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.*, presently available i2⁷) 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 5.9% 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 1.6% 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.

⁴ See *supra* note 1.

⁵ See *supra* note 1.

⁶ See *supra* note 1.

⁷ See *supra* note 1.

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 capital letters.

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