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September 19, 2006

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 August 31, 2006, approximately 89% 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 11% 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. 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.⁵

Consistent with the Commission’s requirement that interconnected VoIP providers notify their subscribers of the limitations of their VoIP services and obtain subscriber acknowledgements of those limitations, AT&T reported in September 2005 that it had received affirmative acknowledgements from approximately 96 percent of subscribers who initiated service before July 22, 2005 (one week prior to the effective date of the *VoIP 911 Order*).⁶ As directed by the Enforcement Bureau’s *VoIP 911 Subscriber Acknowledgement Public Notice*,⁷ AT&T hereby notifies the Commission that the remaining 4 percent of subscribers have since provided the required affirmative acknowledgment or are no longer receiving CallVantage service from AT&T. Thus, AT&T has received affirmative acknowledgements from 100 percent of its existing CallVantage subscribers.

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

⁵ AT&T’s technical solution for nomadic subscribers was described in detail in its October 7, 2005 *ex parte*.

⁶ See Letter from Judy Sello, AT&T, to Marlene Dortch, FCC, WC Docket No. 05-196 (Sept. 22, 2005). AT&T also reported that no new subscribers were provisioned after July 22, 2005, without VoIP 911 acknowledgments. *Id.*

⁷ See *Enforcement Bureau Provides Additional Guidance to Interconnected Voice Over Internet Protocol Service Providers Concerning Enforcement of Subscriber Acknowledgement Requirement*, WC Docket No. 05-196, Public Notice, DA 05-2874 (Oct. 31, 2005) (*VoIP 911 Subscriber Acknowledgement Public Notice*) (directing providers to notify the Commission when they have achieved 100 percent compliance).