

04-36  
05-196



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"Compliance Letter."

October 27, 2006

Commission's Secretary - Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Ms. Dortch;

Universal Telecom, Inc. is preparing to enter the VoIP market by providing residential and business customers with full local voice service including 911 capabilities, supplied by Telefinity Dash911. This compliance letter is in response to FCC requirements in DA 05-2945 and WC Docket No. 04-36 and WC Docket no. 05-196.

**911 Solution:**

The V9-1-1™ solution enabled by Telefinity Dash911 through Intrado provides a true E9-1-1 solution for VoIP Service Providers. The solution provided by the Telefinity Dash911 affiliation with Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Telefinity Dash 911 thereby enabling VSPs to take advantage of a full end-to-end solution from one E911 service provider.

The only VSP requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Telefinity Dash911 via a real-time interface and the PSTN connectivity to the Telefinity Dash911 network to enable live 9-1-1 call delivery. The real-time interface is via a SOAP API programming interface supplied by Telefinity Dash 911 to its VSP customers, or, a branded website interface provided by Telefinity Dash911 to its VSP customers.

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- **911 Routing Information/Connectivity to Wireline E911 Network:**  
 Currently through the assistance of our Network providers, each of Telefinity Dash911's VSP customers will have access to 154 E9-1-1 Selective Routers by November 28<sup>th</sup>, 2005 and the attached "Major Market Deployment Map" and the "VoIP Deployment Plan" reflects the major market deployment schedules. Note: the market deployment map represent major markets where Intrado has reported to Telefinity Dash911 that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.
  
- **Transmission of ANI and Registered Location Information:**  
**Basic PSAP:** As of November 2005 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, the enclosed "Basic 9-1-1 PSAP" map could be used as reference information. While these areas are not included within the FCC Order and are not required for compliance, Intrado reports that they are actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery.
  
- **ANI Only:**  
 There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate. We are offering the service first in Oregon and Southwest Washington states.
  - Telefinity Dash911 has indicated as of November 2005 that Intrado has noted that there are currently four (4) States and a Territory that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:
 

**New Jersey** - In the State of New Jersey Intrado has obtained permission from the State to deploy a voice-only service which includes the call-taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

**Ohio** - To date, Ohio has not granted permission to Intrado to deploy a voice-only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

**Hawaii** - To date, Hawaii has not granted Intrado permission to deploy a voice-only solution. The ALI systems serving Hawaii are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population

**Puerto Rico** - To date, Puerto Rico has not granted permission to Intrado to deploy a voice-only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population

- **VSP Specific Metrics: Please see enclosed VSP coverage Spreadsheets.**
- **911 Coverage:**
  - **Deployment Overview – The Telefinity Dash 911 E911 solution uses Intrado as a backbone supplier and as such Intrado is the VPC and is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order.** The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached “*Major Market Deployment Map*”, which corresponds with MSAs, identifies regions within our subscriber territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. Telefinity Dash 911 has advised us that these areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This intention of this map is to demonstrate FCC compliance for the November 28<sup>th</sup> requirements and the future deployment strategy.

**Obtaining Initial Registered Location Information:**

Universal Telecom, Inc. is requiring each users registered location upon sign up.

**Obtaining Updated Registered Location Information:**

Telefinity Dash 911, as part of our total 9-1-1 solution, provides at least one way of updating each subscriber’s Registered Location. As a component of the Telefinity Dash911 Service we have access to a near real-time address update system provided to us by Telefinity Dash911. This allows us to have near real-time delivery of the subscriber’s address and also allows us as a VSP to submit a subscriber’s address update information directly. The system allows us to have the subscriber input his initial address into the system at the time of initially signing up for our VoIP service. Addresses submitted are subjected to an immediate screening against the US Postal Service Street Address Guide in order to immediately determine if the submitted address is a valid address. VSPs may integrate VUI into their existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado systems.

Subscribers have more than one option to input, update or change their address. Subscribers can easily and quickly update their Registered Location by either (a) online via our website, or (b) use the Telefinity Dash911 telephone touch tone (IVR) system to either select another pre-registered address that the subscriber may already have on file, or to ask for an operator who will make the address change while the customer is on the phone.

At the time of an emergency VoIP 9-1-1 call, Telefinity Dash 911 passes the call directly to Intrado’s call routing system. Intrado’s call routing system uses the customer’s provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid Address and Call Back Number of the user.

Telefinity Dash 911 also offers to us, as a VSP a newly-released product called "Level of Service (LoS) Query" that we can choose to integrate into our application. This functionality enables us to make a real-time query with an address of a customer/end user for the purpose of determining the level of 9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable us or our user to determine the level of 9-1-1 service available at that address and take appropriate action.

In addition, once per year we expect to survey and compare the physical address with the billing address to verify they are in the same calling area. If those addresses are not, an inquiry will be made to the customer to verify that the physical location is correct for 911 reasons.

**Technical Solution for Nomadic Subscribers:**

The company will continue to impress upon the customers that it is their responsibility to update the physical location of the device if they move it.

As a VSP using Telefinit Dash911's E911 for VoIP service, we are able to route VoIP emergency calls from our VoIP network to Telefinity Dash 911's Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon connecting to the Internet at a new location/address. Through the Telefinity Dash 911 interface, the 9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly-provisioned address and make available (assuming no errors) that particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information.

We recognizes the universal desire to remove the user interaction and self-provisioning component of the current 9-1-1 solution. To that end, we understand that Telefinity Dash 911, along with Intrado, are actively working a number of "location determination" technologies.

If you have any questions or need additional information, please don't hesitate to contact me.

Sincerely,



Jeffrey R. Martin  
President  
Universal Telecom, Inc.

cc:

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Enforcement Bureau, Federal Communications Commission  
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Wireline Competition Bureau  
Federal Communications Commission  
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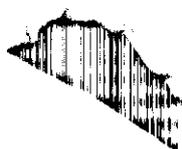
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Priority	Key
1	Will be deployed by 11/28
2	Targeted for deployment 11/28 with outstanding issues
3	Targeted for deployment end of Q1 2006
4	Targeted for deployment end of Q2 2006
5	Voice Only

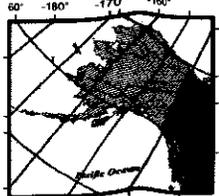
1	Clackamas County Communications	CLACKAMAS	OR	Qwest	MSAG 100%
1	Lake Oswego Communications	CLACKAMAS	OR	Qwest	MSAG 100%
1	Astoria Regional 9-1-1	CLATSOP	OR	Qwest	MSAG 100%
1	Seaside Police Department	CLATSOP	OR	Qwest	MSAG 100%
1	Columbia 9-1-1 Communications District	COLUMBIA	OR	Qwest	MSAG 100%
1	NORCOM	MARION	OR	Qwest	MSAG 100%
1	Santiam Canyon Communications	MARION	OR	Qwest	MSAG 100%
1	Willamette Valley Communications Center	MARION	OR	Qwest	MSAG 100%
1	Portland-Bureau of Emergency Communications	MULTNOMAH	OR	Qwest	MSAG 100%
1	Agency	WASHINGTON	OR	Qwest	MSAG 100%
3	Newberg Police 9-1-1 Center	YAMHILL	OR	Verizon	MSAG 100%--Pending S/R connectivity
3	Yamhill Communications Agency	YAMHILL	OR	Verizon	MSAG 100%--Pending S/R connectivity
3	Prineville Police Department	CROOK	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Deschutes County 9-1-1	DESCHUTES	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Harney County Sheriffs Office	HARNEY	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Jefferson County 9-1-1	JEFFERSON	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Warm Springs Tribal Police Department	JEFFERSON	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	County	BENTON	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Douglas County Sheriffs Communications 9-1-1	DOUGLAS	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Department	LANE	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Eastern Lane 9-1-1 - Oakridge Police Department	LANE	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Department	LANE	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Western Lane 9-1-1 - Florence Police Department	LANE	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Lincoln City Police Department	LINCOLN	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Lincoln County Communications Agency	LINCOLN	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Toledo Police Department	LINCOLN	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Linn County Sheriffs Office	LINN	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Rogue Valley Consolidated Communications	JACKSON	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Southern Oregon Regional Communications	JACKSON	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Josephine County 9-1-1 Agency	JOSEPHINE	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Klamath County Emergency Communications District	KLAMATH	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Lakeview Police Department	LAKE	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Tri-County Communications	GILLIAM	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	John Day Police Department	GRANT	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Morrow County Sheriffs Office	MORROW	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Hermiston Police Department	UMATILLA	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Milton-Freewater Police Department	UMATILLA	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Umatilla County Sheriffs Office	UMATILLA	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Union County Communications	UNION	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Wallowa County Sheriffs Office	WALLOWA	OR	Qwest	MSAG 100%--Pending S/R connectivity
3	Coos County Dispatch	COOS	OR	Verizon	MSAG 100%--Pending S/R connectivity
3	North Coos County 9-1-1	COOS	OR	Verizon	MSAG 100%--Pending S/R connectivity
3	Brookings Police Department	CURRY	OR	Verizon	MSAG 100%--Pending S/R connectivity
3	Curry County Sheriffs Office	CURRY	OR	Verizon	MSAG 100%--Pending S/R connectivity
3	Hood River County Dispatch Center	HOOD RIVER	OR	Sprint	MSAG 100%--Pending S/R connectivity
3	Malheur County Sheriffs Office-Vale	MALHEUR	OR	Qwest	Pending S/R connectivity
3	Ontario Police Department	MALHEUR	OR	Qwest	Pending S/R connectivity
3	Tillamook County 9-1-1	TILLAMOOK	OR	Sprint	MSAG 100%--Pending S/R connectivity
3	Wasco County Communications	WASCO	OR	Sprint	MSAG 100%--Pending S/R connectivity

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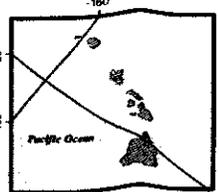
1	Bellevue Police Department Communications Center	KING	WA	Qwest	MSAG 100%
1	Bothell Police Department	KING	WA	Qwest	MSAG 100%
1	Grays Harbor Communications	GRAYS HARBOR	WA	Qwest	MSAG 100%
1	Island County Emergency Services Communications C	ISLAND	WA	Verizon	MSAG 100%
1	JEFFCOM 9-1-1 Communications	JEFFERSON	WA	Qwest	MSAG 100%
1	King County Sheriffs Office	KING	WA	Qwest	MSAG 100%
1	Kirkland Police Department	KING	WA	Qwest	MSAG 100%
1	Kitsap County-CENCOM	KITSAP	WA	Qwest	MSAG 100%
1	Lewis County 9-1-1 Communications Division	LEWIS	WA	Qwest	MSAG 100%
1	Marysville Police Department	SNOHOMISH	WA	Verizon	MSAG 100%
1	McChord Air Force Base Fire Department	PIERCE	WA	Qwest	MSAG 100%
1	Pacific County Communications	PACIFIC	WA	Qwest	MSAG 100%
1	Pencom-Clallam County	CLALLAM	WA	Qwest	MSAG 100%
1	Puyallup Communications	PIERCE	WA	Qwest	MSAG 100%
1	Redmond Police Department	KING	WA	Qwest	MSAG 100%
1	San Juan County Sheriffs Office	SAN JUAN	WA	Qwest	MSAG 100%
1	Seattle Police Department	KING	WA	Qwest	MSAG 100%
1	Skagit County 9-1-1 Emergency Communications Cent	SKAGIT	WA	Verizon	MSAG 100%
1	SNOCOM	SNOHOMISH	WA	Verizon	MSAG 100%
1	SNOPAC	SNOHOMISH	WA	Verizon	MSAG 100%
1	Sumner Communications	PIERCE	WA	Qwest	MSAG 100%
1	Thurston County-CAPCOM	THURSTON	WA	Qwest	MSAG 100%
1	University of Washington Police Department	KING	WA	Qwest	MSAG 100%
1	Valley Communications Center-King County	KING	WA	Qwest	MSAG 100%
2	Buckley Police Department	PIERCE	WA	Qwest	MSAG 100%, pending ESQK builds
2	Fife Police Department	PIERCE	WA	Qwest	MSAG 100%, pending ESQK builds
2	Ft Lewis Military Reservation-MADCOM	PIERCE	WA	Qwest	MSAG 100%, pending ESQK builds
2	Law Enforcement Support Agency	PIERCE	WA	Qwest	MSAG 100%, pending ESQK builds
2	Port of Seattle Police Department	KING	WA	Qwest	MSAG 100%, pending ESQK builds
2	Shelton Police Department (Shelcom)	MASON	WA	Qwest	MSAG 100%, pending ESQK builds
2	What-Comm Communications Center	WHATCOM	WA	Qwest	MSAG 100%, pending ESQK builds



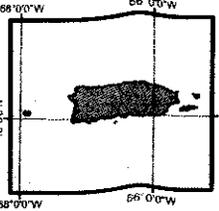
### Alaska



### Hawaii

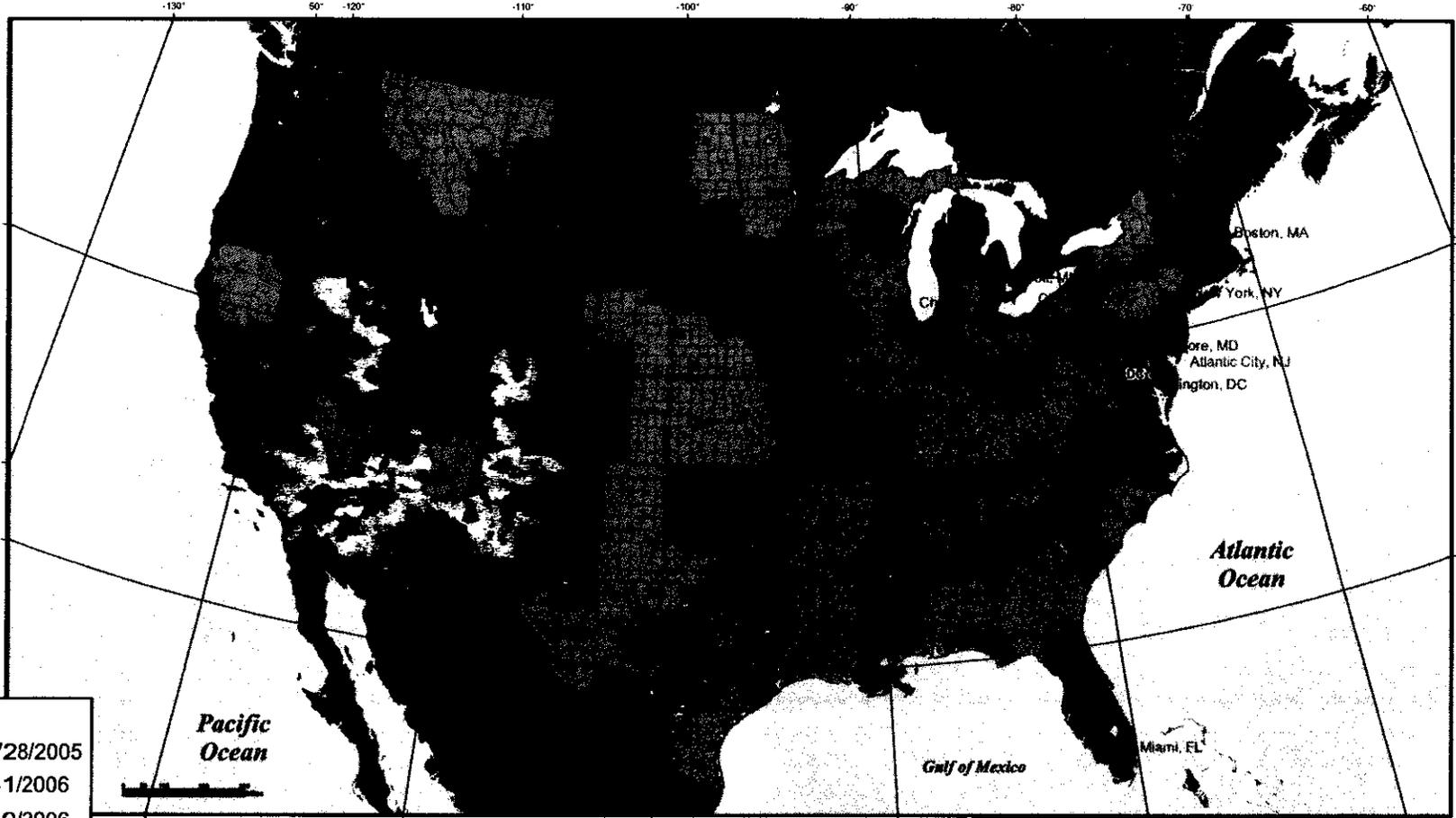


### Puerto Rico



### Legend

-  Planned for 11/28/2005
-  Planned for 3/31/2006
-  Planned for 6/30/2006
-  County Boundary
-  Top 20 MSAs
-  Lakes



## Intrado Major Market Rollout Schedule

