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via email transmission

Re: CC Docket No. 94-102
WC DOCKET NO. 04-36

Dear Commissioner Tate,

After consultation with Jim Kohlenberger, Staci Pies and other colleagues within the VON Coalition, we would like to address some of the specific issues flagged by the Redbox E-911 for VoIP "solution". Redbox offers a product for Multi-Line Telephone System (MLTS) enterprise VoIP systems -- not Interconnected VoIP. The FCC has had an open proceeding on MLTS for more than 13 years and has not yet even imposed a basic 911 requirement for these legacy analog PSTN systems. NENA and others for years have asked the FCC to act. In the FCC's absence of action, at least 13 states have stepped forward with varying MLTS E911 requirements for legacy systems. But many states are left without even a basic 911 requirement.

In the meantime, VoIP technology for these MLTS has leaped forward to help provide solutions where PSTN systems cant. Cisco has had this type of nomadic E911 technology (I believe) built into its CallManager system for a while. They can automatically locate the user by IP port within the Enterprise. When the Commerce Department switched to VoIP after 9/11, they did so using this Cisco CallManager technology because it not only provided them better E911 location capabilities, but because it could also give them a "reverse 911" capability like an emergency broadcast system thru their phones in another 9/11 type attack.

I have attached, for example, a story about the Chicago Public School system choosing VoIP because it could use Mitel's port-based location technology to more accurately locate a VoIP 911 call by classroom -- something not possible with legacy systems. So, here, VoIP technologies offer better E911 then legacy systems. I don't think RedBox's technology is doing anything beyond what Cisco and Mitel already offer in the marketplace.

What RedBox's 911-Enabled solution does, like other enterprise nomadic solutions, is it allows a limited number of workplace IP addresses to be matched up with a location (including room location) -- thus providing what amounts to an x,y,z location. It is not a solution that is capable of working for Interconnected VoIP services that can be connected to any IP address.

Nonetheless, this is the type of technology that the VON Coalition highlighted in its 911 NPRM filing noting that its members are working on further advancing this promising technology for Interconnected VoIP services, with the help of a Commerce Department grant, jointly with Texas A&M university, NENA, et al. This is also the type of location technology that becomes possible through the VON Coalition's work with the Department of Transportation and Commerce Department's E911 program office. DOT, for example, has an RFP for proposals that they hope to award by the end of December that will enable PSAPs to handle this kind of data.

The VON Coalition, together with NENA, had previously filed a joint petition for clarification with the FCC more than a year ago which the FCC has still not acted upon to allow testing of these kinds of technologies. Without an answer, Texas A&M university has asked for a specific waiver to allow testing of the system of IP based network and location technologies -- because the transition to IP based technologies can allow for a set of breakthrough advances including disaster recovery for the PSAP. But to date, the FCC has not granted a single waiver request. So while the technology is promising, we are working through the standards process to advance these technologies, there are regulatory barriers that are slowing down potentially live saving solutions.

For Interconnected VoIP systems, the problem that we have is not knowing the user's location -- VoIP providers share their location, but Intrado, Level3, and HBF don't have the ability to pass that location to the PSAP. No GPS chip, RedBox, or other technology solves the problem of getting it to the PSAP. Fortunately, it's only about 250,000 VoIP subscribers who cannot pass this location data as compared to more than 3 million in wireline system, about a million wireline phones, and about 81 million wireless users. While it should be the smallest of the FCC's worries as compared to other communications technologies, we have nonetheless petitioned the FCC jointly with NENA to solve this problem for the rest of these VoIP users by providing access to the selective routers. Both the House and Senate are also keen on solving this problem -- which is fundamentally about connecting to selective routers and not a problem in knowing here the user is.

All my best,
Jonathan Askin