

8 December 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 an *ex parte* filed on 12 October 2006. We are pleased to report that Vonage now provides *either basic or enhanced 911 service to 93.1% of its subscriber lines.*¹

We also thought the Commission would be interested in the attached Consumer Reports survey, which found that callers using VoIP to make a 911 call were able to communicate successfully with 911 operators more often than callers using a cell phone.²

Vonage’s Current 911 Deployment Status

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

1. For 92.4% 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

¹ In addition to providing 911 service to existing customers, *Vonage can provide E911 service pursuant to NENA’s i2 standard, as presently available, to 1,406 additional PSAPs that do not yet serve Vonage subscribers.*

² Phoning 911, available at http://www.consumerreports.org/cro/electronics-computers/phoning-911-1-07/overview/0107_911_ov.htm?resultPageIndex=1&resultIndex=1&searchTerm=1/07%20VoIP.

³ These updated percentages reflect the 911 coverage status of those subscribers added by *December 1, 2006.*

delivered via the native 911 network to the geographically appropriate PSAP and the PSAP is able to access both call back information and location information for that customer. In order to provide this service, Vonage uses the database services of two VoIP Position Center subcontractors – Tele-Communications Systems and Intrado.

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 .5% 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 1.4% 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 4.2% 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 .8% 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 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.

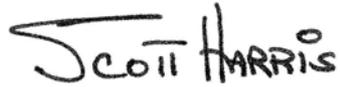
⁵ See note 4.

⁶ See note 4.

⁷ See note 4.

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 a large, sweeping initial "S".

Scott Blake Harris
Brita D. Strandberg
Counsel to Vonage America, Inc.

cc: Daniel Gonzalez; Michelle Carey; Thomas Navin; Ken Moran, Dana Shaffer, Julie Veach; Rene Crittendon; Christi Shewman; Joe Casey; Kathryn Berthot; Chris Olsen; Mike Carowitz; Nicholas Alexander, Carol Simpson

Phoning 911

Gaps despite new technologies



READY TO HELP
 Information about
 incoming calls is
 displayed onscreen at the
 Dutchess County, N.Y.,
 911 call center.

"Dutchess 9-1-1. What is the address of your emergency?" Every telephone call to the Department of Emergency Response in Dutchess County, N.Y., is answered this way, although new technology can make the caller's street address or geographical coordinates appear on a screen.

But even at this state-of-the-art facility, one of 6,138 local 911 answering centers in the country that dispatch police, fire, and medical personnel, it's sometimes difficult to find the people who place the calls.

That became distressingly clear last summer when a young girl called the 911 center from her cell phone while clinging to her father, who couldn't swim, after their kayak tipped over in the Hudson River. The pair's location could not be determined by high-tech location technology, so a dispatcher had to guide the rescue boats by conversation instead.

Despite considerable investment in 911 technology and ongoing monthly charges to many subscribers in the form of added fees or state taxes, emergency-call dispatchers still can't depend on location data provided by phone carriers, nor can consumers. Data from wireless carriers can be error-prone, and even information from residential landlines can be wrong if not updated.

Consumer Reports' latest reader survey on 911 service found that in the 12 months before September 2006, 1 in 8 of the respondents encountered some difficulty. This online survey, conducted by the Consumer Reports National Research Center, also found that 1 in 25 wireless callers never successfully connected or communicated with 911. Though not a nationally representative sample, a failure rate of this magnitude would imply 4 million unsuccessful wireless 911 calls a year.

Of those in *CR's* survey making 911 calls in the previous 12 months, 59 percent had done so on a wireless phone. (In a *CR* survey of cell-phone buyers, 29 percent said they bought the phone for emergencies.) But wireless subscribers can't count on their calls to provide vital information to responders. Ten years after the Federal Communications Commission began mandating wireless "enhanced 911"--or E911--services, including the transmission of phone numbers and locations, nearly half of the U.S. territory is still without 911 centers that can find wireless callers.

The lag is mostly in rural areas (more than three-fourths of the American population is covered by location-capable call centers), but local coverage varies. North Dakota, for example, was among the earliest to adopt wireless E911, while nearby Nebraska has virtually no wireless 911 location capability statewide. The National Emergency Number Association, which tracks telephone services, reports that 109 counties in the U.S. still have no 911 or E911 service at all. People there still must dial a 7- or 10-digit number to summon local help.

To be found with the most accurate technology, wireless subscribers to Alltel, Sprint Nextel, or Verizon must have a handset equipped with Global Positioning System capability. Off-the-shelf prepaid cell phones report the phone number of the caller but often have no location-reporting capability and don't give the name of the phone's owner to dispatchers. In *CR's* survey, only 1 in 8 of the 911 callers said an operator was able to find them by determining location of the phone--an essential capability in case of a dropped call, always a possibility with wireless.

Consumer Reports recommends having more than one type of phone for emergencies, including a landline phone, even if at the most basic level of service. Neither wireless nor VoIP (telephone service over the Internet) can replace landlines for reliability, even though that service also is vulnerable in calamities.

WHAT YOU CAN DO

In a real emergency, obviously you must get through to 911 to alert responders. Don't hang up too soon. Several unanswered rings

might not mean that an operator won't answer: An overloaded 911 call center might be switching calls to another location.

Try 911 again. If you get a busy signal, a dropped call, or poor voice quality, as did about 40 percent of those with 911 calling difficulties in *CR's* survey, try again using the same phone at the same location, or again someplace else. Or have someone else call. Those strategies were effective for most of the callers who tried them in our survey.

Know your location. Once you reach a 911 operator, expect to be asked for your address. That could be more of a problem for cell-phone callers than landline users, who are less likely to be in unfamiliar surroundings.

Be concise. Just over half of the wireless 911 callers in *CR's* survey said they phoned after seeing an emergency. With several wireless users often reporting the same incident, it's important to give accurate, succinct information for responders.

911 cell static

When you phoned the 911 operator, were you able to communicate successfully with the operator?

	Total	Cell phone	Regular landline	VoIP
Yes, on the first try and without any difficulty	88%	84%	95%	88%
Had some difficulty or never connected	12%	16%	5%	12%

Source: *Consumer Reports National Research Center, September 2006.*

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