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November 30, 2006

Ms. Marlene H. Dortch
Office of Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

RE: Compliance Letter – IP – Enabled Services, WC Docket No. 04-36:
E911 requirements for IP – Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

Gardonville Telephone Association (“Gardonville”) hereby submits this letter in compliance with the Commission’s VoIP 911 Order in the above referenced dockets.

Gardonville plans to begin offering fixed, non-nomadic VoIP service in Alexandria, Minnesota and portions of Douglas County, Minnesota beginning January 1, 2007. In these areas, Gardonville will be providing 911/E911 service to 100% of its VoIP customers in compliance with the Commission’s rules. Further, Gardonville will not market to or accept new customers whose Registered Locations are in areas where it does not have 911 capability. Gardonville does not plan to market, offer or provide VoIP Service on a nationwide basis and does not plan on offering nomadic VoIP service.

As a Local Exchange Carrier authorized to provide local exchange service in Minnesota, Gardonville is currently interconnected with the public switched telephone network (PSTN) and the Wireline E911 Network.

Emergency 911 calls placed by Gardonville’s VoIP customers will be routed through Gardonville’s local switch and over its 911 interconnection trunks. As such, 911 calls from Gardonville’s VoIP customers will be routed directly to the appropriate 911 PSAP.

1) Customer Acknowledgement of E911 Limited.

In Gardonville’s VoIP end user service agreement, which subscribers must execute when they initiate service will clearly indicate that the VoIP customer acknowledges and agrees that 911 dialing will not function properly if the VoIP customer moves the device to another service address, either temporarily or permanently, unless service is discontinued at the old service address and service is established at a new address in the area for which Gardonville provides 911 emergency dialing. In addition the End User Agreement will clearly indicate other E911

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limitations of VoIP service. Gardonville will inform all subscribers at the time that they sign up for service and in the

form of labels that subscribers must place on their phone or other device that subscribers are able to update the physical location information by contacting the Company's customer service representatives and make appropriate changes in their service.

2) Obtaining and Updated Registered Location Information.

As described herein, Gardonville will obtain the "Registered Location" of one hundred percent of its VoIP subscribers.

When new subscribers order VoIP service, they will be required to provide and confirm the physical location of their service address during the order process. This will be required whether a sale is made over the telephone or in person at a Gardonville Customer service location. In all cases, during the sales process, an installation appointment for each customer will be arranged. On the pre-arranged date, Gardonville will dispatch an installation technician to the subscriber's home to install a terminal adapter, which is a voice-enabled terminal adapter that contains an RJ-11 outlet and to perform any necessary inside wiring work at the subscriber's premises. As part of this installation service call, Gardonville technicians will verify that the address information that the subscriber provided Gardonville during the initial sale is correct. In addition, after the initial sale and before the service installation at the subscriber's premises, Gardonville will begin the process of provisioning E911 service to that subscriber by submitting the subscriber's address information to the appropriate ALI database. The physical address information contained in the ALI database for each VoIP subscriber is the "Registered Location" for that subscriber within the meaning of the order. Therefore, Gardonville will obtain a Registered Location for each of its subscribers as of both the initial sale of service and the initial date of service. In addition, as described above, Gardonville will submit the Registered Location to the ALI database prior to physically installing service at the subscriber's premise.

Gardonville VoIP customers will be, advised (1) through the sales process, (2) at the time of service implementation and (3) through acknowledged terms and conditions, that the VoIP Service provided by Gardonville is not a nomadic service, but rather a fixed service to be used only at the customer's Registered Location.

If a VoIP subscriber moves to a new residence and wishes to retain his or her VoIP service, the subscriber must terminate service at the initial location and order service at the new location. When the subscriber notifies Gardonville via phone or during an in person contact at a Gardonville customer service location of a move, Gardonville will schedule a new installation appointment and dispatches a technician to provision VoIP service at the new location. As with an initial installation, the technician will provide, if necessary, and set up a terminal adapter and perform any necessary inside wiring work to ensure that the VoIP service operates throughout the home. Apart from service activation, this service call also allows Gardonville to verify the subscriber's new address. Just as with a new subscriber, Gardonville will submit the subscriber's ANI and ALI information with the ALI database after being notified of the move and before installing service in the new location. This new ALI entry then becomes the subscriber's new Registered Location.

Gardonville is committed to ensuring that in all customer service interactions that its customers understand that its VoIP service is only offered and provided as a fixed service and that they fully understand the limitation of VoIP E911 service.

3) Technical Solutions for Nomadic Subscribers.

Gardonville VoIP will not be a nomadic service and Gardonville has no plans to offer nomadic service in the future. Gardonville's VoIP service is designed to operate only when provided over Gardonville's wireless broadband access and its switching and routing facilities. Accordingly, devices used in connection with Gardonville VoIP are not designed to be moved.

Thus, the technical solutions that have been designed "to ensure that subscribers have access to 911 service whenever they use their service nomadically" are not applicable to the fixed, facilities-based VoIP service provided over Gardonville's wireless broadband service

The fixed nature of Gardonville's VoIP service also means that "updating information regarding the user's physical location" occurs only in the context of a permanent address change – not in the context of nomadic use of the service. As described above, changes in the physical location of a subscriber's VoIP equipment will require a call or in person contact with Gardonville customer service representatives before the service can be used at the new residence and service is actually terminated at the previous location and re-initiated at the new location. During that process, Gardonville will automatically update the subscriber's Registered Location by provisioning E911 service at the new location as part of the service activation at the new locations.

Please contact me if I can be of assistance with additional information.

Respectfully submitted,



David Wolf

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