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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,<sup>1</sup> per AT&T's October 7, 2005 *ex parte* letter<sup>2</sup> and the Commission's June 3, 2005 *VoIP 911 Order*.<sup>3</sup>

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 January 31, 2007, approximately 96% of AT&T CallVantage customers have Enhanced 911 (E911) and less than 1% have Basic 911 (911).<sup>4</sup> This latter category is limited to areas where only Basic 911 is offered by the public safety answering point (PSAP). The remaining 4% of customers are provided with Alternative 911 (A911) and are being served with

<sup>1</sup> 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.

<sup>2</sup> 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*).

<sup>3</sup> *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*).

<sup>4</sup> 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.

A911 on a “grandfathered” basis.<sup>5</sup> 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.<sup>6</sup>

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

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<sup>5</sup> Consistent with its October 7, 2005 *ex parte*, AT&T has implemented procedures to cease accepting customers in geographic areas that are not yet VoIP E911-enabled. AT&T has discovered, however, that due to an error by our 911 vendor regarding the manner in which certain home-rule cities are categorized in its database, AT&T CallVantage service with A911 service was activated for a customer in such a city on January 15, 2007. Upon discovering that this service had been provisioned, AT&T contacted the customer on January 20, 2007, advised him that his service should not have been activated, explained the limitations of his A911 service, and subsequently discontinued his service. AT&T has also worked with its 911 vendor to improve the management of its database to prevent the activation of AT&T CallVantage service for similarly situated customers in the future.

<sup>6</sup> AT&T’s Heartbeat Solution for nomadic subscribers was described in detail in its October 7, 2005 *ex parte*.