



April 11, 2007

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.,
Washington, DC 20554

Re: 911 Compliance Status Report (WC Docket No. 05-196)

Dear Ms. Dortch:

Level 3 submits this response to the request of the Enforcement Bureau directing interconnected VoIP service providers to update the status of their compliance with the Commission's VoIP 911 rules. Level 3 responds on behalf of itself and the following companies which have been acquired by Level 3 since the original compliance letters were submitted in November 2005: Telcove, ICG Telecom Group and Broadwing Communications. Level 3 has consolidated the VoIP product offerings of these companies and offers services to both wholesale and enterprise customers.

In the wholesale market, Level 3 offers its customers -- who are Interconnected VoIP Providers-- some of the building blocks they require to provide their retail Interconnected VoIP services. Level 3 offers these components separately or as part of a bundle of services. Specific components include connectivity with the public switched telephone network ("PSTN") as well as either Static or Nomadic E-911 which is compliant with the VoIP 911 Order. Level 3 built its 911 network by directly interconnecting to the appropriate elements of the Wireline E-911 Network, having deployed dedicated T-1s and default trunking for all the areas of the country where it offers 911 services. The Level 3 E-911 network connects to 342 Selective Routers, serving PSAPs covering 81.4 % of the U.S. population. Level 3, through its VoIP Positioning Center partners, has tested and certified nomadic E-911 coverage with PSAPs serving over 74% of the U.S. Population. This number will continue to grow as testing is successfully conducted with additional PSAPs.

For enterprise customers, Level 3 as an Interconnected VoIP Provider offers two products--an IP Trunking service and a Network VoIP Service.

- IP Trunking provides Native IP PSTN access for IP-PBXs or a traditional PBX connected via an Integrated Access Device (IAD).

- Network VoIP Service (NVS) provides Class 5 VoIP to the Desktop. Enterprise customers using NVS can purchase one of a dozen supported SIP phones or multi-line Analog Terminal Adapters manufactured by various suppliers¹. As shown in the attached picture, these customer-premise devices are designed for use in a fixed, not nomadic, environment. These are large desk sets, generally weighing more than a pound and not easily moved between locations by the end user.

Level 3 designed both products for static use. For Level 3's retail VoIP services, Level 3 does not accept subscriber orders in geographic areas where it does not have connectivity to the native 911 infrastructure. As a result of this practice and the dedicated Level 3 E-911 network, Level 3 transmits all 911 calls to the appropriate PSAP using the Selective Router and designated trunking for all areas where Selective Routers are utilized.

Level 3 is committed to ensuring that all of its wholesale and retail VoIP customers receive access to 911 service that is fully compliant with the Commission's rules. If you have any questions, regarding this status report, please do not hesitate to contact me.

Sincerely,



Maria Farnon
Vice President, Product Delivery
Local Voice Services
Level 3 Communications, LLC

¹ Level 3 currently supports the following devices on its NVS Offering:

- Cisco 7905, 7912, 7940, 7960, ATA-186
- MediaTrix 1102, 1104, 1124
- Polycom Soundpoint IP 300, 430, 4000, 500, 600, 601



Pictured: Three of the devices supported on Level 3 Network VoIP Service