



April 11,2007

VIA ECFS

Marlene H Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, D C 20554

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

Dear Ms Dortch:

USA Companies, L P (“USA Companies”) hereby files this response to the letter sent from Kathryn S Berthot, Chief, Spectrum Enforcement Division, Enforcement Bureau, dated March 12,2007 requesting additional information regarding the status of USA Companies’ Voice over Internet Protocol (“VoIP”) 911 compliance¹

Provision of Compliant 911 Service: A quantification, on a percentage basis, of the number of subscribers to whom you are able to provide **911** service in full compliance with the rules established in the VoIP 911 **Order**.

45 percent

911 Coverage: **To** the extent you have not achieved **full 911** compliance with the requirements of the **VoIP 911 Order** in all areas of the country in which you are providing interconnected VoIP service to the subscribers: (i) list each PSAP serving such areas of the country; and (ii) describe in detail your plans for coming into **full** compliance with the requirements of the order ,including your anticipated timeframe for such compliance.

¹ See Letter from Kathryn S Berthot, Chief, Spectrum Enforcement Division, Enforcement Bureau, Federal Communications Commission to Christian Hilliard, President, USA Companies, L L C (dated March 12, 2007) (“March 12Letter”)

The following is a list of PSAPs in areas of country where we are providing interconnected VOIP service but have not achieved full 911 compliance:

PSAP: Big Horn County Sheriffs Office

NENA ID: 300030002
FCC ID: 4116
county: Big Horn
State: Montana

PSAP: Carbon County Sheriffs Office

NENA ID: 300090001
FCC ID: 4122
County: Carbon
State: Montana

PSAP: Stillwater County Sheriff

NENA ID: 300950001
FCC ID: 4166
County: Stillwater
State: Montana

PSAP: Laurel Police Department

NENAID: 301110001
FCC ID: 4140
county: Yellowstone
State: Montana

PSAP: Boone County Sheriffs Department

NENAID: 310110001
FCC ID: 4560
County: Boone
State: Nebraska

PSAP: Colfax County Communications

NENA ID: 310370001
FCC ID: 4575
county: Colfax
State: Nebraska

PSAP: Norfolk Police Department

NENAID: 311190001
FCC ID: 4632
County: Madison
State: Nebraska

PSAP: Nance County Sheriff
NENA ID: 311250001
FCC ID: 4629
County: Nance
State: Nebraska

PSAP: Columbus Police Department
NENA ID: 311410001
FCC ID: 4576
County: Platte
State: Nebraska

PSAP: Polk County Sheriff
NENA ID: 311430001
FCC ID: 4643
County: Polk
State: Nebraska

PSAP: Merrick County Sheriff
NENA ID: 311210001
FCC ID: 4626
county: Merrick
State: Nebraska

PSAP: Grand Island – Hall County
NENA ID: 310790001
FCC ID: 4599
county: Hall
State: Nebraska

We are working with Net 2 Phone for a build out to provide E911 service in rate centers where available. We anticipate completion of this process and full compliance within approximately five months.

911 Routing Information/Connectivity to Wireline E911 Network: Provide a statement as to whether you are transmitting, as specified in Paragraph 42 of the *VoIP* 911 Order, “all 911 calls to the appropriate [Public Safety Answering Point (PSAP)], designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized.” If you are not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include: (i) a quantification, on

a percentage basis, of the number of subscribers whose 911 calls are not currently being routed to the appropriate PSAP via the dedicated Wireline E911 Network; and (ii) a detailed explanation why not..

We are not transmitting all 911 calls to the appropriate PSAP, designated statewide default answering point or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSA, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized, 55 percent of our interconnected VoIP subscribers' E911 calls are not currently being routed to the appropriate PSAP via the dedicated Wireline E911 Network. The reason for this is that the physical circuits have yet to be built out to the Selective Routers located at the PSAPs

New VoIP Customers and/or Marketing of VoIP Service in Non-Compliant Areas:

Significantly, some providers such as AT&T and Verizon have committed to not accepting new customers in areas where the provider cannot provide 911 service. State whether you have stopped accepting new customers and marketing your VoIP service in non-compliant areas, and, if so, the date on which you stopped. If you have continued to accept new customers for its service and/or market your VoIP service in areas where you are con-compliant, explain how these actions are consistent with the Commission rules. Further, indicate the overall number of subscribers currently served in each of your non-compliant areas, and the number of those subscribers that received their,initial service after November 28,2005.

Because of competitive pressures regarding other non-compliant VoIP providers, we have not stopped accepting new customers for interconnected VoIP service in non-compliant areas. The following is a list of the number of subscribers served in each of our non-compliant areas (PSAPs) and the number of those subscribers that received their initial service after November 28,2005:

<u>PSAP Where Service Provided</u>	<u># of Customers</u>	<u># of Post 11/28/05</u>
Big Horn County Sheriffs Dept	6	6
Carbon County Sheriffs Dept	34	32
Stillwater County Sheriff	38	37
Laurel Police Department	174	155
Boone County Sheriffs Dept,	7	7
Colfax County Communications	11	11
Norfolk Police Department	4	4
Nance County Sheriff	16	16
Columbus Police Dept	4	4
Polk County Sheriff	27	27
Merrick County Sheriff	17	17
Grand Island/Hall County	1	1

If you have any questions regarding this response, please do not hesitate to contact the undersigned

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stuart Gilbertson', with a long horizontal stroke extending to the right.

Stuart Gilbertson
Chief Operating Officer
USA Companies, L P

CC: Kathy Berthot*
Carol Simpson*
Best Copy and Printing, Inc *

* *Via Email*