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April 11, 2007

VIA ELECTRONIC FILING

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

**Re: E911 Compliance Status Report
deltathree, Inc.; WC Docket No. 05-196**

Dear Ms. Dortch:

deltathree, Inc. (“deltathree” or the “Company”), pursuant to the Commission’s *VoIP E911 Order*¹ concerning the enhanced 911 (“E911”) service requirements and conditions applicable to interconnected Voice over Internet Protocol (“VoIP”) service providers, submits this Compliance Status Report (“Report”) to advise the Commission of the status of deltathree’s efforts to comply with the Commission’s VoIP E911 Rules.²

deltathree is a provider of Internet telephony solutions to consumers, resellers and service providers worldwide. It offers VoIP services including broadband phone, and PC to phone through its VoIP consumer division. deltathree’s VoIP service is portable; so long as a deltathree customer has access to broadband Internet access, the customer can make use of the service anywhere in the United States or the world. deltathree’s customer base is global in nature, and

¹ *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking 20 FCC Rcd. 10245 (2005) (“*VoIP E911 Order*”).

² Pursuant to the Commission’s prior Public Notices, deltathree filed four status reports concerning the Company’s efforts to notify its customers of the limitations associated with the Company’s VoIP 911 service, and to obtain affirmative acknowledgments from those subscribers stating that they fully understand those limitations. These reports were filed in the above-referenced docket on August 10, September 1, September 22, and November 28, 2005.

over 70% of its revenues are generated from customers located outside of the United States. The information provided in this letter is limited to deltathree's consumer division interconnected VoIP customers having a registered location, within the United States.

As required by the Commission's rules, as well as the Public Notice issued by the Enforcement Bureau on November 7, 2005³ (the "Public Notice") and the letter to the Company from the Commission dated March 12, 2007 (the "Letter Request"), this Report provides a status update of the current efforts by deltathree to provide E911 service to customers in compliance with Commission Rules 9.5(b) and (c), and to comply with registered location requirements of Commission Rule 9.5(d). Pursuant to the information requested by the Enforcement Bureau in the Letter Request, the Company provides as follows:

1) 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 E911 Order*.

deltathree provides 911 service through the E911 solution provided by Intrado, Inc. ("Intrado" or "Third Party Provider") in full compliance with the VoIP e911 Order to all of the interconnected subscribers of deltathree's consumer division, except for a number of these subscribers who were grandfathered because they were receiving service prior to the FCC's deadline for compliance with the E-911 regulations. The FCC permitted service providers to continue to provide service to those existing customers rather than disconnect those customers. Pursuant to the FCC's requirement, after the implementation deadline for the E-911 requirements, we have offered and provided services to only those new consumer division interconnected customers where we can provide the required E-911 service.

2) 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 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.

The Company believes it has achieved full compliance. Please see the response to question number 1 above.

3) 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 PSAP, designated statewide default

³ *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, Public Notice, DA 05-2945 (rel. Nov. 7, 2005).

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.

deltathree is transmitting all 911 calls in compliance with the *VoIP E911 Order* for all customers located in areas where Intrado’s VoIP E911 solution is available. Please find attached as Exhibit A, a map that illustrates both the current and future areas where Intrado is and will be offering VoIP E911 services.

- 4) **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 non-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.**

As of November 28, 2005, we have been providing services to our consumer division interconnected customers only where we can provide the required E-911 service and, therefore stopped accepting any new customers in non-compliant areas as of such date. Additionally, we do not conduct direct marketing to specific geographic areas. With the exception of our grandfathered consumer division interconnected customers, deltathree has no consumer division interconnected customers who are being served in non-compliant areas. All of such grandfathered customers received their initial service before November 28, 2005.

Respectfully submitted,

deltathree, Inc.

/s/ Eugene Serban

Name: Eugene Serban

Title: General Counsel

cc: Kathy Berthot (FCC)
Carol Simpson (FCC)
Best Copy and Printing, Inc.

Exhibit A

Intrado Market Deployment Map

PSAP Deployment Delays

Data as of March 27, 2007

Canada

Mexico

Gulf of Mexico

Alaska

Puerto Rico

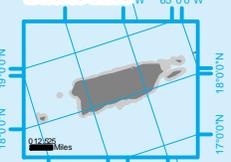
Hawaii

Deployment Delays

- Multi - ESN
- Pending LEC
- Pending PSAP
- No Delay

Map Subject to Change
Intrado Proprietary

0 125 250 500 Miles



Intrado Major Market Rollout Schedule

Data as of March 27, 2007

Deployment Schedule

- Deployed
- Planned for Q1 2007
- Planned for Q2 2007
- Planned for Q3 2007
- Scheduling In Progress



Map Subject to Change
Intrado Proprietary

