

April 11, 2007

Via ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Re: *E911 Requirements for IP-Enabled Service Providers*, WC Docket No.
05-196

Dear Ms. Dortch,

CommPartners, LLC provides the following information in response to the letter received from the Enforcement Bureau dated March 12, 2007. Since the Commission's ruling in Docket 05-196, CommPartners has strictly followed the rules requiring E911 be provided to VoIP end users. As CommPartners noted in its November 28, 2005 compliance filing, CommPartners does not sell services directly to end users, instead selling wholesale hosted VoIP to retail VoIP providers. As such, CommPartners provides this information on behalf of those providers.

CommPartners' uses Intrado as its emergency services provider and I understand that Intrado regularly updates the Commission in its ongoing PSAP deployment efforts. Given that the Commission has received detailed information from Intrado as to its progress and remaining challenges for full PSAP coverage, I will not discuss those in this letter. Moreover, Intrado and its customers are bound by a non-disclosure agreement whereby the particular details of PSAP deployment are not to be disclosed publicly.

In response to the specific information requested, CommPartners offers the following:

Provision of Compliant 911 Service: 100% of CommPartners hosted VoIP end users are in compliance with all FCC rules regarding E911. CommPartners provides full E911 services to 74.9% of hosted VoIP end users. For 13.1% of the end user base, the local PSAP does not yet have E911 capability for VoIP established with Intrado. For 12% of hosted VoIP end users, the hosted end user only has standard 911 capabilities. The latter two categories of end users were in service as of November 28, 2005 and thus CommPartners is allowed to continue serving them despite their lack of true E911 capability.

911 Coverage: CommPartners defers to the deployment information provided by Intrado for a response to this issue. It should be noted that for the vast majority of PSAPs for which E911 is not available for VoIP, the problem is with the PSAPs themselves. PSAPs are often simply unwilling to upgrade their systems to be compatible with VoIP. There

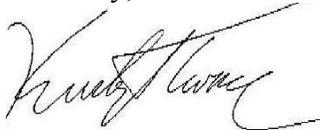
are numerous reasons given by PSAPs for why they are not E911 capable for VoIP. The usual answer is simply a lack of money.

911 Routing Information/Connectivity to Wireline E911 Network: All 911 calls generated by hosted VoIP end users are immediately routed to Intrado for completion at the appropriate PSAP. CommPartners routinely makes test calls to PSAPs to ensure that the calls are being properly routed and completed.

New VoIP Customers and/or Marketing of VoIP Service in Non-Complaint Areas: Since November 28, 2005, CommPartners has not provisioned any hosted VoIP end users that are not in compliance with 05-196's requirements. In fact, given the low percentage of PSAP VoIP E911 availability at the time, the rules forced CommPartners to make the difficult decision to completely cease selling hosted VoIP to residential customers. Although most of CommPartners' competitors appear not to have stopped marketing in non-E911 capable areas, CommPartners has made a commitment to strictly follow the Commission's rules. This has continued to hinder CommPartners' and its retail providers' growth, and benefited rivals willing to ignore the Commission's rules. So as an unintended consequence, the Commission's attempt to protect the public through these E911 rules has ultimately created a distortion in the market for hosted VoIP services.

CommPartners will continue to provide updates when available to the Commission. If any further information is required, please contact me at 702 367-8647, extension 1079.

Sincerely,



Kristopher E. Twomey

Enc.

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