



August 29, 2007

**SUMMARY OF
EX PARTE PRESENTATION**

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWA325
Washington, DC 20554

Re: IP-Enabled Services; Implementation of Sections 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996: Access to Telecommunications Services, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; The Use of N11 Codes and Other Abbreviated Dialing Arrangements; WC Docket No. 04-36, WT Docket No. 96-198, CG Docket No. 03-123, and CC Docket No. 92-105

Dear Ms. Dortch:

Today, on behalf of the United States Telecom Association (USTelecom), Toni R. Acton of AT&T and Micki M. Chen, Richard T. Ellis, Leslie V. Owsley of Verizon, and I met with Cathy Seidel, Consumer and Governmental Affairs Bureau Chief, Nicole McGinnis, Deputy Bureau Chief, Thomas Chandler, Chief of the Disability Rights Office, and Lisa Boehley, attorney. USTelecom members Burt J. Bossi, Gail Sanchez, and Celia Nogales of AT&T participated in the meeting by telephone.

We discussed the difficulty telecommunications relay service (TRS) operators, public safety answering points (PSAPs), and providers of interconnected Voice over Internet Protocol (VoIP) face in implementing one aspect of the requirement to offer 711 dialing for access to telecommunications relay services, as required by the Federal Communications Commission in its June 15, 2007 order. When VoIP users with a hearing disability dial 711 rather than 911 in emergencies, it is possible that their calls might not be routed to the correct PSAP if the caller is using a non-geographic telephone number or is using VoIP service nomadically. It is also possible that a caller's number and address might not be transmitted to the PSAP for some kinds of VoIP services. USTelecom members do not believe that TRS operators, PSAPs, and VoIP providers can overcome the potential technical challenges posed by the use of 711 dialing in this context by the October 5, 2007 deadline set by the Commission.

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Pursuant to Section 1.1206(b) of the Commission's rules, one copy of this electronic notice is being filed in the above-referenced docket. Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Indra Sehdev Chalk". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Indra Sehdev Chalk
Counsel

cc: Cathy Seidel
Thomas Chandler
Nicole McGinnis