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VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, D.C. 20554

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

Dear Ms. Dortch:

On behalf of AT&T Inc. (AT&T), I am submitting this letter detailing our compliance with the Commission's 911 requirements for interconnected Voice over Internet Protocol (VoIP) services, specifically AT&T CallVantage® service,¹ per AT&T's October 7, 2005 *ex parte* letter² and the Commission's June 3, 2005 *VoIP 911 Order*.³

In its October 7, 2005 *ex parte*, AT&T explained the steps that it would undertake in the event that it was not able to provide E911 service to 100% of its customer base. As part of that filing, AT&T committed to stop accepting new customers in areas where it cannot provide E911 service, to make voluntary contributions to a public safety organization for grandfathered customers until AT&T can provide those customers with E911 connectivity, and to implement any new commercially reasonable technological solutions to expand its E911 footprint throughout the country.

As of August 31, 2007, AT&T offered Enhanced 911 (E911) service to 100% of AT&T CallVantage customers whose registered location was in an area where the public safety answering point (PSAP) provided E911 service.⁴ AT&T no longer relies on Alternative 911 (A911) to serve such customers. A small number of customers (less than 1% of all customers)

¹ AT&T CallVantage service is actually provided to subscribers by an AT&T affiliate; for simplicity, however, in this letter we refer to AT&T CallVantage as being provided by AT&T.

² See Letter from Robert W. Quinn, Jr., AT&T, to Marlene H. Dortch, FCC, WC Docket No. 05-196 (Oct. 7, 2005) (AT&T October 7, 2005 *ex parte*).

³ *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd. 10245 (2005) (*VoIP 911 Order*).

⁴ Some AT&T CallVantage service customers have more than one telephone number associated with their service. Although this letter refers to subscribers or customers, customer data in this paragraph are computed on a telephone number basis.

have Basic 911, which is provided in areas where only Basic 911 is offered by the public safety answering point.

In addition to broadening the availability of E911 service, we have also taken steps to address the nomadic use of AT&T CallVantage service. Specifically, AT&T's "Heartbeat Solution" enables customers to obtain proper 911 routing when they use AT&T CallVantage service nomadically within AT&T's 911-capable footprint, and only enables service at locations where AT&T can provide 911 capabilities.⁵

If you have any questions or need additional information, please do not hesitate to contact me.⁶ Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/ Jack Zinman

cc: Daniel Gonzalez
Ian Dillner
Thomas Navin
Kathryn Berthot
Janice Myles

⁵ AT&T's Heartbeat Solution for nomadic subscribers was described in detail in its October 7, 2005 *ex parte*.

⁶ Having reached 100% coverage, AT&T does not intend to continue filing monthly status updates with the Commission for its CallVantage service, unless the Commission notifies AT&T that it wishes to continue receiving such updates.