Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matters of	)	
	)	
IP-Enabled Services	)	WC Docket No. 04-36
	)	
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 Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities	)	WT Docket No. 96-198
	)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	CG Docket No. 03-123
	)	
The Use of N11 Codes and Other Abbreviated Dialing Arrangements	)	CC Docket No. 92-105

QWEST COMMUNICATIONS CORPORATION PETITION FOR AN EXTENSION OF TIME TO IMPLEMENT VoIP 711-DIALING IN A NOMADIC CONTEXT

I. QWEST SEEKS AN EXTENSION OF TIME TO ACCOMPLISH NOMADIC VoIP 711 DIALING/ROUTING TO THE "APPROPRIATE RELAY CENTER"

A. The Scope of Qwest's Extension Request is Very Narrow and Will Not Compromise or Harm the Public Interest.

Qwest Communications Corporation ("Qwest")[1] requests a limited extension of time to implement the 711-dialing and routing requirements that the Federal Communications Commission ("Commission") has imposed on VoIP carriers.[2] By the effective date of the

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[1] Qwest's Voice over Internet Protocol ("VoIP") services are offered through this affiliate.

[2] *See In the Matters of 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 Service, 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*

Commission's *Reconsideration Order* (April 5, 2008), Qwest will be able to route VoIP 711-dialed calls to the appropriate TRS center for "home" (or fixed) locations of its VoIP offerings. At this time, however, Qwest is not technically able to route a nomadic[3] VoIP 711-dialed call to the "appropriate" relay center, as the Commission recently clarified that term.[4] And Qwest does not anticipate having such capability until first quarter of 2009. Qwest believes the public interest will not be compromised or harmed by the grant of such an extension in light of its limited scope and likely impact, which is addressed more fully below.

Qwest's need for an extension of time is not unanticipated. Last December Qwest advised the Commission that achieving VoIP 711-dialing to the "appropriate relay center" might not be achievable by April of 2008.[5] While some commentors suggested to the contrary,[6] it now appears that Qwest's caution was prescient.[7] Indeed, Qwest believes it will not be the only VoIP

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and Other Abbreviated Dialing Arrangements, Report and Order, 22 FCC Rcd 11275 (2007) ("*VoIP 711-Dialing Order*"); *pets. for waiver granted in part and denied in part*, Order and Public Notice Seeking Comment, 22 FCC Rcd 18319 (2007); ("*VoIP 711-Dialing Reconsideration Order*" or "*Reconsideration Order*").

[3] *Reconsideration Order*, 22 FCC Rcd at 18319-20 ¶ 1 ("when the caller's telephone number does not correspond to the caller's actual location").

[4] In the *Reconsideration Order*, the Commission clarified that the phrase "appropriate relay center" was meant "to signify the relay center(s) serving the state in which the caller is geographically located, or the relay center(s) corresponding to the caller's last registered address." *Id.* at 18322-23 ¶ 9. *And see VoIP 711-Dialing Order*, 22 FCC Rcd at 11288-97 ¶¶ 32-43.

[5] *See* Reply Comments of Qwest Communications Corporation, Inc., WC Docket No. 04-36, *et al.*, filed Dec. 17, 2007 at 2.

[6] Qwest notes that the Voice on the Net ("VON") Coalition filed comments last December stating that it did "not seek a further extension of time to meet the 711 dialing obligations beyond the 6-month extension already granted by the Commission" (until April, 2008). Comments of the Voice on the Net (Von) Coalition, WC Docket No. 04-36, *et al.*, filed Dec. 3, 2007 at 1.

[7] *And see* Reply Comments of Verizon, WC Docket No. 04-36, *et al.*, filed Dec. 17, 2007 at 2 (noting that "the technical and operational challenges [of fully realizing the Commission's VoIP 711-dialing goals] are complex" and indicating that a waiver of two years would be appropriate).

provider unable to route VoIP 711-dialed calls to the geographically correct relay center when the call is made in a nomadic context.[8]

To put Qwest's request for an extension in perspective, the request is very narrow in scope in terms of processed-711 call traffic. As a preliminary matter, the request is *only* with respect to 711-VoIP *nomadic* dialing. Yet, it is with respect to that type of dialing that the Commission has expressed its primary concerns that 711-dialed calls in the nature of emergency calls might be misrouted. While Qwest has very little factual information about VoIP 711 dialing, it does have some information about 911 "emergency" dialing that can help in assessing the "order of magnitude" of Qwest's requested extension.

If one looks at the volume of 911-dialed calls as a baseline of "emergency activity" with respect to Qwest's VoIP offering, a random sample of those calls from February 2008 shows that very few of Qwest's total call volume (around 5M calls) were of an emergency nature, specifically 720 were E911 and 2 were V911 (nomadic).[9] Dialed 911 calls, then, represent 0.014% of the total local calls processed with respect to Qwest's VoIP offering.

At this time, Qwest has no actual knowledge of ever having processed a 711 call, let alone one involving an emergency. But for discussion purposes, it assumes that some calls occur. While Qwest does not specifically track 711 calls, it estimates that they would constitute no more than 0.1% of its local traffic volume. Of that 0.1%, *if one assumes* the same ratio of 711 "emergency calls" as 911-emergency calls are to Qwest's total VoIP call volume, Qwest would

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[8] In an effort to understand why the VON members felt no additional time was necessary to meet the VoIP 711-dialing requirements, Qwest employees spoke with representatives of VON. While Qwest cannot speak for VON, it appears that some of their members may be able to meet the requirements by April, 2008 with respect to VoIP nomadic calling (by utilizing an 811-dialing architecture). Qwest questions, though, whether all nomadic interconnected VoIP providers will be able to meet the current deadline.

[9] *See* Attachment 1, Statement of David G. Williams, ¶ 4 ("Williams Statement").

expect that theoretically there might be seven 711 emergency calls in any particular month (or 0.014% of 5K). Of those seven, some would clearly be local 711 dialing (which Qwest can currently process) and only some fraction of that would reflect nomadic 711-dialing. Without question, then, the scope of Qwest's requested extension of time, as well as its market or public safety impact, is narrow.

Moreover, as we describe below, there are relay center processes currently in place to address nomadic VoIP 711 dialed calls in the nature of emergency calls. National databases allow for 911/PSAP lookups that facilitate call processing.[10] Continuation of those processes through the end of the first quarter 2009 will not adversely affect the public interest.

B. Qwest is Working With Intrado on a Solution to Process Nomadic 711-Dialed Calls to the "Appropriate Relay Center."

As outlined by Mr. Williams in his attached Statement,[11] to accomplish 711-dialing in a nomadic context, a customer's address needs to be updated in some type of system so that when a customer dials 711 from that location, the customer will be connected to the TRS provider serving that address. Qwest has been investigating how best to structure this kind of address lookup for VoIP-dialed 711 nomadic calls. In light of the fact that Qwest already had extensive experience developing a similar address-lookup functionality for nomadic VoIP 911 in cooperation with Intrado, Inc. ("Intrado"), Qwest approached Intrado about crafting a similar functionality for VoIP nomadic-711-dialing.

Intrado has determined that it can deliver a technical solution to the nomadic 711-dialing challenge by taking advantage of its existing VoIP-E911 database and the current "registered location" protocol involved in providing VoIP E911 service. That same "registered address" will

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[10] *Id.* ¶ 8.

[11] *Id.* ¶¶ 3-4.

be used to route all Qwest's VoIP 711-dialed calls to the appropriate relay center. However, this development and implementation activity cannot be achieved by April 5, 2008. Based on consultations with Intrado, Qwest believes that this nomadic 711-dialing solution cannot be implemented until first quarter of 2009.

Intrado has committed to an eleven month development schedule to deliver a fully nomadic 711 solution for VoIP users. The development involves creating a capability to route calls made by a VoIP customer dialing 711 to the appropriate relay center based on the caller's registered location, rather than the NPA-NXX that may display in connection with the call. This 711-dialing functionality would utilize an underlying new 911 architecture that Intrado has developed and is deploying. In the next four to six months, Intrado will be migrating Qwest (as well as other of its 911 customers) to a new platform called FMCC (Fixed Mobile Convergence Center).[12] In parallel, Intrado will be developing the nomadic-711 product. The actual development work will begin during March 2008 and will take six to eight months to complete. Upon completion of the development work, Intrado will require two to four months of internal testing. The internal testing will necessarily be extensive to assure there are no potential impacts to the 911 FMCC platform. After completion of its internal testing, Intrado estimates four to six weeks of testing with Qwest. Upon successful testing with Qwest, the product will be available for general use. It should also be noted that although Intrado is developing the nomadic 711 solution for Qwest it will be generally available to other VoIP providers.

In line with Intrado's estimated development and delivery timeline, Qwest asks that it be granted until end of first quarter 2009 (*i.e.*, March 31, 2009), to implement the nomadic 711 routing. At this time, Qwest believes that this timing would give it some reasonable amount of

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[12] *Id.* ¶ 6.

time after its vendor rolls out the service functionality to test and deploy the functionality as integrated into its service offering.

Below, Qwest demonstrates that its request for additional time to deploy nomadic VoIP 711-dialing meets the standard for granting a waiver.

II. QWEST'S WAIVER PETITION MEETS THE STANDARD FOR EXTENSIONS OF TIME AND WAIVERS

A. Qwest Demonstrates Good Cause for an Extension and Waiver Relief and Outlines a Realistic Path to Compliance.

A waiver is appropriate whenever special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.[13] Qwest's Petition results from a technical inability to achieve the requirements of VoIP 711-dialing to the "appropriate relay center" in the time currently allotted.[14] This technical inability is outside of its control and the control of its vendors since, until October 2007, no such technical requirement was foreseen.

The Commission's rules were promulgated in anticipation of technical solutions, rather than in the context of technological solutions capable of being implemented through currently-existing, tried-and-true, products or services. The rules, therefore, should accommodate limited waivers based on the reality of product availability and suitability. Where, as here, regulations are premised on the Commission's predictive judgment as to a service provider's capabilities

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[13] 47 C.F.R. § 1.3; *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969)). *And see* 47 C.F.R. §§ 1.3, 1.925(b)(3). In those cases where the Commission fashions a regulatory regime based on predictive judgments that later prove inaccurate (*e.g.*, in this case, customer churn), the Commission must revisit its prescriptions accordingly. *See Aeronautical Radio, Inc. v. FCC*, 928 F.2d 428, 445 (D.C. Cir. 1991); *Telocator Network of America v. FCC*, 691 F.2d 525, 550 n.191 (D.C. Cir. 1982); *P&R Temmer v. FCC,* 743 F.2d 918, 929 (D.C. Cir. 1984).

[14] The Commission has acknowledged that "the record reflects that transmitting 711 calls *via* an interconnected VoIP service, rather than the PSTN [Public Switched Telephone Network], to an appropriate relay provider creates technological challenges for interconnected VoIP providers[.]" *Reconsideration Order*, 22 FCC Rcd at 18322 ¶ 8. *And see id.* at 18320 ¶ 2.

(and those of their suppliers), and the facts indicate the absence of a ready technical solution, waiver is particularly appropriate.[15]

B. The Public Interest Will Not be Compromised by Granting Qwest an Extension of Time.

The Commission's *Reconsideration Order* makes evident that its desire to drive VoIP 711-dialed calls to the "appropriate" relay center is driven, in large part, by those few 711-dialed calls that involve emergency situations, *i.e.*, calls that are in the nature of 911 calls but that reach the TRS centers through 711 dialing.[16] It is in that situation where reaching a relay center associated with a geographically proximate Public Safety Answering Point ("PSAP") is important from a public health and safety perspective.

Qwest understands and appreciates that "building out" VoIP 711-dialing capabilities should improve the calling experience for those VoIP customers that utilize such dialing, whether in a home/fixed or nomadic mode. And being able to associate the geography of a nomadic caller with the geographically-designated relay center and associated PSAP are important goals that regulators, service providers, and relay centers should pursue cooperatively and collaboratively. But as Qwest noted above, the volume of 711-dialed calls are fairly small; the volume of nomadic 711 calls even smaller; and the volume of emergency calls associated with nomadic 711-dialed calls smaller still. Qwest believes this is likely true for all VoIP providers.

Just as important to the public safety analysis as the fact that there are a limited number of 711-dialed emergency calls is the fact that there are current mechanisms in place to respond to

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[15] *See National Rural Telecom Ass'n v. FCC*, 988 F.2d 174, 181 (D.C. Cir. 1993).

[16] *See Reconsideration Order*, 22 FCC Rcd at 18319-21 ¶¶ 1-3, 18321-22 ¶¶ 6-7, 18322-23 ¶¶ 9 and 11, 18324-25 ¶¶ 12-15 and n.28.

the limited number of VoIP 711-dialed calls that would involve an emergency.[17] As the National Emergency Number Association ("NENA") has described, "NENA and other entities have compiled PSAP directories of varying characteristics. A national database of PSAPs and their corresponding jurisdictional boundaries are available for purchase by TRS providers."[18] The national database approach that NENA described exists today. In fact, it is used even in those situations where 711-dialing would route to a relay center associated with a home/fixed location.

Moreover, that database will continue to exist -- and be employed by TRS providers -- ***even after*** VoIP service providers are capable of routing a 711-dialed call to the appropriate relay center, whether the 711-dialed call was made in a fixed or a nomadic environment. Given that it is the VoIP provider's obligation to get the call to the "appropriate relay center," the processing of a 711-dialed emergency call will remain the processing obligation of the relay center to which the call is delivered. Whether the relay center reached is "geographically" associated with the nomadic caller, or whether that caller reaches its "home" relay center, the relay center in question likely will require the database solution to reach the correct PSAP in any event.[19] Indeed, Qwest believes that the current routing protocol will likely be utilized for some time to come, since the industry has not determined how such TRS/PSAP routing will be accomplished.[20]

Given that the "TRS/PSAP" connection will likely take considerable time to resolve, granting Qwest's request for an extension of time will not compromise public health and safety.

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[17] Williams Statement ¶ 10.

[18] *See* Comments of NENA, WC Docket No. 04-36, *et al.*, filed Dec. 3, 2007 at 4, n.6 ("NENA Comments"). Comments of Hamilton Relay, Inc., filed Dec. 3, 2007 at 4. *And see* Williams Statement ¶¶ 8-9.

[19] *Compare* NENA Comments at 3 (noting the "challenge faced by TRS providers when needing to route an emergency call to an appropriate PSAP"), 4.

[20] Williams Statement ¶¶ 11-12.

While some VoIP 711-dialed calls in a nomadic environment will be served from their home relay center during the period of the extension, the tools remain for that relay center to process such a call when it is of an emergency nature to a PSAP nearby or across the country.

Qwest therefore asks the Commission for an extension of time until March 31, 2009 to route VoIP 711-dialed calls in a nomadic context to the "appropriate relay center."

Respectfully submitted,

QWEST COMMUNICATIONS
CORPORATION

By: Kathryn Marie Krause

Craig J. Brown
Kathryn Marie Krause
Suite 950
607 14th Street, N.W.
Washington, DC 20005
(303) 383-6651

Its Attorneys

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ATTACHMENT 1

STATEMENT OF DAVID G. WILLIAMS

I, David G. Williams, hereby state that the following information is true and correct to the best of my knowledge, information and belief.

1. **Biographical Information.** I am currently a Senior Product Manager at Qwest; and I am responsible for Qwest's Consumer VoIP product. I have been a Product Manager on Qwest's VoIP product team since December 2003 and have launched VoIP products for long distance and toll free services and have worked on the development of VoIP products that interface with IP-based PBX systems (also known as Session Initiation Protocol (SIP) Trunking and traditional PBX systems using an IP adapter). I have over 20 years experience in the Telecom Industry. I am responsible for the necessary activities associated with implementing VoIP 711 dialing in line with the Commission's *Orders*.

2. **Request for Extension of time.** I am submitting this Statement in support of Qwest's Petition for an Extension of Time with respect to nomadic VoIP 711-dialing. Qwest's current VoIP offering supports 711 dialing with regard to "home" (or "fixed") service locations through its own network architectures or through a partnership with Level 3 for those serving wire centers outside of Qwest's fourteen-state operating territory. Until the Commission's *Reconsideration Order*, where it clarified that it meant the phrase "appropriate relay center" for VoIP 711 dialing to mean "the relay center serving the state in which the caller is geographically located, or the relay center(s) corresponding to the caller's last registered address" (*Reconsideration Order* at ¶ 9), it was not clear that a VoIP 711-dialed call needed to be delivered to a relay center geographically proximate to the caller when the caller was in a nomadic environment. Neither Qwest nor Level 3 supports a nomadic solution for 711 dialing at this time. Nor will Qwest or Level 3 be able to provide such 711-dialing support by April 5, 2008, the current effective date of the Commission's *Reconsideration Order*.

3. To accomplish 711-dialing in a nomadic context, a customer's address needs to be updated in some type of system so that when a customer dials 711 from that location, the customer will be connected to the TRS relay provider serving that address. Qwest has been investigating how best to structure this kind of address lookup for VoIP-dialed 711 nomadic calls. In light of the fact that Qwest already had extensive experience developing a similar address-lookup functionality for nomadic VoIP 911 in cooperation with Intrado, Inc. ("Intrado"), Qwest approached Intrado with a view toward crafting a similar functionality for VoIP nomadic 711-dialing.

4. Intrado, in fact, has determined that it can deliver a technical solution to the nomadic 711-dialing challenge, taking advantage of its existing VoIP-E911 database and the current "registered location" protocol involved in providing VoIP E911 service. That same "registered address" will be used to route all VoIP 711-dialed calls to the

appropriate relay center. However, this development and implementation activity cannot be achieved by April 5, 2008. Based on consultation with Intrado, Qwest believes that this nomadic 711-dialing solution cannot be implemented until first quarter of 2009. For this reason, Qwest asks for an extension of time until March 31, 2009 to deploy nomadic 711-dialing to the "appropriate relay center."

5. **Scope of Waiver Request and Impact to Calling Parties.** To put Qwest's request for an extension in perspective, the request is very narrow in scope in terms of processed-711 call traffic. The request is with respect to 711-VoIP nomadic dialing, where the Commission's primary concern is with emergency calls presented through a 711-dialing act rather than a 911-dialing Act. If one looks at the volume of 911-dialed calls as a baseline of "emergency activity" with respect to Qwest's VoIP offering, of the five million local calls Qwest processes monthly from its VoIP subscriber base, a random sampling from February 2008 showed only 720 were E911 and 2 were V911 (nomadic). Dialed 911 calls, then, represent 0.014% of the total local calls processed with respect to Qwest's VoIP offering. While Qwest does not specifically track 711 calls, we estimate that they constitute no more than 0.1% of our local traffic volume. Of that 0.1% we would expect to see a calling ratio equivalent to the 911-call ratio to total call volume (5K). That would mean that theoretically there might be seven 711 emergency calls (or 0.014% of 5K) in any particular month. Of those seven, clearly some would be local 711 dialing (which Qwest can currently process) and only some fraction of that would reflect nomadic 711-dialing. In fact, Qwest believes that we have never actually processed a 711 call for emergency service but for discussion purposes acknowledge that there may be some very small number of VoIP subscribers making such calls.

6. **Vendor Solution.** The Intrado solution referenced in paragraphs 3 and 4 above will associate the Qwest customer's last registered address with the toll-free number of the TRS provider geographically appropriate for the address in question (*i.e.*, the TRS provider chosen by the state as the "official" TRS provider). The customer's registered location information will be validated by Intrado upon a Qwest query for 711 routing instructions for a subscriber. The proposed 711 dialing solution provided by Intrado will employ the same interfaces that are currently used in connection with support of Qwest's VoIP 911 offering. Utilizing the same routing architecture, either existing PRI connections to the local PSAP or SIP-based IP connections from Qwest to Intrado, provides a reliable and tested routing architecture, as well as providing desirable cost efficiencies for Qwest. Qwest believes that it is one of several VoIP providers that intend to use Intrado in the development of a nomadic 711 solution.

7. The development of this solution by Intrado involves creating a capability to route calls made by a VoIP customer dialing 711 to the appropriate relay center based on the caller's registered location, rather than the NPA-NXX that may display in connection with the call. This 711 dialing functionality would utilize an underlying new 911 architecture that Intrado has developed and is deploying. In the next four to six months, Intrado will be migrating Qwest and other 911 customers to a new platform called FMCC (Fixed Mobile Convergence Center). The new platform will replace their end-of-life TRU64 platform and will support both VoIP and Wireless products. In parallel, Intrado

will be developing the nomadic 711 product. Intrado has committed to an eleven month development schedule to deliver a fully nomadic 711 solution for VoIP users. The actual development work will begin during March 2008 and will take six to eight months to complete. Upon completion of the nomadic 711 development, Intrado will require two to four months of internal testing. The internal testing will necessarily be extensive to assure there are no potential impacts to the 911 FMCC platform. After completion of its internal testing, Intrado estimates four to six weeks of testing with Qwest. Upon successful testing with Qwest, the product will be available for general use. It should also be noted that although Intrado is developing the nomadic 711 solution for Qwest it will be generally available to other VoIP providers.

8. **711-Routing Description in the Context of Emergency Calling.** Qwest understands that while TRS service contracts are awarded by the various states, TRS providers' relay centers are not necessarily located in each state. Rather, their centers are located throughout the U.S., and TRS calls are routed to the specific providers' centers based on unique toll free numbers assigned to them by each state. All local exchange carriers ("LECs") and interconnected VoIP network service providers are now required to route 711 dialed calls to each state's TRS provider.

9. Today, when a customer dials 711 and it is routed to the TRS provider associated with the caller's NPA-NXX, if the call involves an emergency *even in a fixed location (i.e., permanent registered address)*, the TRS provider must utilize a database to determine the "appropriate" PSAP to send the call to. Stated differently, while Qwest will be capable of routing fixed 711-dialed calls to the "appropriate relay center" as the Commission has defined that term by the effective date of the *Reconsideration Order*, the TRS provider *will still utilize a 911-database lookup* to associate the correctly-routed call to the appropriate PSAP for the caller.

10. The 911-database lookup described in paragraph 7 occurs today and will continue to occur even after service providers can route nomadic 711 calls to the "appropriate relay center." Qwest understands that *today* when a caller declares their 711-dialed call to involve an emergency, the TRS operator presses a key at their station that activates the TRS provider's "E911 database." That database identifies the closest PSAP to the "location" indicated by the NPA-NXX of the calling number. It is Qwest's further understanding that the "E911 database" used by the TRS provider is not limited to PSAPs of the state where the TRS provider was awarded the Relay service contract, *i.e.*, Washington State Relay (provided by Sprint) is not limited to accessing only Washington PSAPs. Sprint/TRS' "E911 database" has the PSAP numbers for all PSAPs across the country. Although this TRS database-lookup model many not be optimal to handle emergency calls, it is currently available and operational, and it likely will be utilized for some time into the future.

11. The Commission's requirement that service providers route nomadic 711-dialed calls to a relay center associated with the caller's geography or last registered service address will get those 711-dialed calls to the "appropriate relay center," *but* that does not mean that *in the event of a 711 "emergency" call* the relay center will be able to get the

call routed to the right PSAP without using the database functionality described above in paragraph 9. To the best of Qwest's knowledge, TRS providers have not developed industry standards to be able to automatically deliver a 711-dialed call into the TRS center out to the appropriate PSAP.

12. Given that the TRS providers will, of necessity, likely be using their national PSAP database for some time to come -- even after all 711-dialed calls (both fixed and nomadic) are delivered to the "appropriate relay center" by VoIP providers -- the public interest will not be compromised by an extension of time associated with the routing of nomadic 711-dialed calls. Such extension will allow the creation of a 711-dialed routing and delivery mechanism that builds on the reliable and tested VoIP 911-routing mechanism in place today.

By: /s/ David G. Williams

March 7, 2008

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **QWEST COMMUNICATIONS CORPORATION PETITION FOR AN EXTENSION OF TIME TO IMPLEMENT VoIP 711-DIALING IN A NOMADIC CONTEXT** to be: 1) filed with the FCC via its Electronic Comment Filing System in WC Docket No. 04-36, WT Docket No. 96-198, CG Docket No. 03-123 and CC Docket No. 92-105; and 2) served via e-mail on the FCC's duplicating contractor Best Copy and Printing, Inc. at fcc@bcpiweb.com.

/s/Richard Grozier

March 7, 2008