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March 28, 2008

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Federal Communications Commission
Office of the Secretary

Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Telecommunications Relay Services (TRS) and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123;**

IP-Enabled Services, WC Docket No. 04-36

**Implementation of Sections 255 and 251(a)(2) of The Telecommunications Act of 1934, as
Enacted by the Telecommunication act of 1996: Access to telecommunications Service,
Telecommunications Equipment, and Customer premises Equipment by Persons with
Disabilities, WT Docket 96-198**

The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket 92-105

Dear Ms. Dortch:

In response to questions from FCC staff, Verizon offers the following information to supplement information contained in our March 27 Petition for Extension of Waiver for 711 calling handling requirements for interconnected VoIP providers.

Currently Verizon offers two types of VoIP-based calling services:

- Verizon Business offers business customers fixed-location VoIP products with geographically relevant phone numbers. These products do not yet offer nomadic calling or "pick your own area code" features. Calls to 711 would route to the TRS center that serves the customer's geographic location. To the best of our knowledge, however, VerizonBusiness does not have any VoIP customers who are TTY users, and to the best of our knowledge, we have not had any VoIP-based calls to 711 to date.
- Verizon's consumer-oriented VoIP product ("VoiceWing") is a different application. VoiceWing is "over the top," and is both an inherently nomadic service and offers all customers the "pick your own area code" feature. The combination of these features means that a customer who initially chooses a geographically relevant number could move her

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service to another location where the number would not be geographically relevant. Similarly, a customer who has chosen a non-geographically relevant number could later move his service to a location where the number would be geographically relevant (and then could move away again later). Accordingly, for purposes of call routing, the VoiceWing architecture does not distinguish geographically relevant numbers from non-geographically relevant numbers at this time. Any 711 calls placed using VoiceWing would be routed to a specially designated telephone number at a single TRS center. This would enable the answering Communications Assistant to recognize the call as a VoIP customer and properly and appropriately assist him or her. Again, to the best of our knowledge, however, Verizon does not have any retail VoIP customers who are TTY users, and we have not had any VoIP-based calls to 711 to date.

As we stated in our petition for extension of the waiver, Verizon is currently evaluating in-house and third-party systems that would enable us to route 711 calls from VoIP customers to the appropriate TRS center even where the customer has nomadic service or a non-geographically relevant number. Our best estimate is that we will need 12 months to fully implement the requirements of the order across our product line. In addition, as noted in our petition, additional work needs to be done with Industry and TRS providers to find a solution of routing TRS-based emergency calls to the proper PSAP.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Telli". The signature is written in a cursive, flowing style.

Cc: Nicole McGinnis
Alan Amann
Lisa Boehley
Thomas Chandler