

April 10, 2008

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Notice of Oral Ex Parte Communication, In the Matter of Petition of  
TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver  
Of Part 52 of the Commission's Rules, CC Docket 99-200**

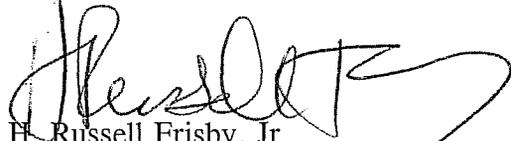
On April 9, 2008, the undersigned as counsel, together with Kim Scovill, Senior Director of Government Relations of TeleCommunication Systems, Inc. ("TCS") met with Julie Veach, Deputy Bureau Chief of the Wireline Competition Bureau and Amy Bender, Legal Counsel to the Bureau Chief. TCS' representatives discussed why the Federal Communications Commission's grant of the above-referenced petition is necessary to protect public safety by ensuring the continued efficient provision and deployment of VoIP E911 service. They also discussed why the grant of the requested waiver would result in a significant conservation of numbering resources based on the following analysis:

1. There are approximately 1,300 interconnected nomadic VoIP service providers and 6,100 PSAPs nationwide.
2. Based on industry practice TCS estimates that at least 2 ESQKs would be required by every interconnected nomadic VoIP service provider to deploy to every PSAP in order to manage E911 calls.
3. Therefore, without VPCs to aggregate ESQKS, interconnected nomadic VoIP service providers would need up to 15,860,000 ESQKs (1300 x 6,100 x 2) to deploy to all PSAPs.
4. In contrast, a VPC is typically assigned 10 ESQKs per PSAP so that 10 different calls from a variety of VoIP providers can be processed simultaneously. Consequently, 2 VPCs would need only 122,000 ESQKs to deploy to all PSAPs (2 x 10 x 6100).

Under these circumstances, the number conservation benefits involving the use of 122,000 ESQs versus almost 16 million ESQs are clear.

Pursuant to the Commission's rules, 47 C.F.R. § 1.1206(b)(1), this letter is being filed electronically for inclusion in the record of the above-referenced proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "H. Russell Frisby, Jr.", with a large, sweeping flourish extending to the right.

H. Russell Frisby, Jr.

Counsel to TeleCommunication Systems, Inc.

cc: Julie Veach, Deputy Bureau Chief  
Amy Bender

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