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23 July 2008

Ex Parte

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

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

Dear Ms. Dortch:

On behalf of Vonage America, Inc. (“Vonage”), we are submitting this letter updating the status of Vonage’s efforts to provide E911 services to all of its customers. This letter updates the information provided in an *ex parte* filed on February 4, 2008. We are pleased to report that Vonage now provides *either basic or enhanced 911 service to nearly 99% of its subscriber lines, or more than 2.4 million lines.*¹

Vonage’s Current 911 Deployment Status

For the purposes of 911 services Vonage’s customers can currently be grouped as follows:²

1. For 98.45% of its customers, Vonage provides the full suite of E911 service pursuant to NENA’s i2 standard, as presently available.³ This means that all such 911 calls are

¹ In addition to providing 911 service to existing customers, *Vonage can provide E911 service pursuant to NENA’s i2 standard, as presently available, to 2,226 additional PSAPs that do not yet serve Vonage subscribers.*

² These updated percentages reflect the 911 coverage status of those subscribers added by *July 1, 2008.*

³ NENA’s 08-001 Interim VoIP Architecture for Enhanced 9-1-1 Services, or “i2 standard” calls for a number of technical elements (such as a nationally accessible MSAG databases, an MSAG-based national routing database, and a p-ANI administrator) that are not currently available. Vonage provides the full suite of i2 services that are presently available, and strongly supports NENA, public safety, and industry efforts to implement the remaining elements of NENA’s i2 standard. Vonage’s references to its provision of the full suite of E911 service pursuant to NENA’s i2 standard refers to its provision of all currently-available elements of that

delivered via the native 911 network to the geographically appropriate PSAP and the PSAP is able to access both call back information and location information for that customer. In order to provide this service, Vonage uses the database services of two VoIP Position Center subcontractors – Tele-Communication Systems and Intrado.

2. For .48% of its customers, Vonage provides voice-only 911 service because the PSAP that serves these customers' Registered Location is not capable of handling location and/or call back information. In other words, for these customers, Vonage delivers their 911 calls via the native 911 network to the geographically appropriate PSAP and the PSAP is able to conduct a two-way conversation with the caller.
3. For .12% of its customers, Vonage has 3rd party direct trunk connectivity to the appropriate Selective Router, and has gathered and processed all the necessary data inputs from the relevant ILECs and/or PSAPs to provide full E911 (*i.e.*, presently available i2⁴) service, but has not yet completed certain necessary system testing. Vonage anticipates completing these tests within 5 to 45 days, at which time it will be able to offer these customers the full suite of E911 services supported by the i2 standard, as presently available.⁵
4. For .27% of its customers, Vonage currently has 3rd party direct trunk connectivity to the appropriate Selective Router and has gathered all the necessary data inputs from the relevant ILECs and/or PSAPs to provide full E911 (*i.e.*, presently available i2⁶) service, but the ILECs and VPCs have not yet loaded the data into their respective databases. The necessary system testing is scheduled upon completion of this data load.
5. For .09% of its customers, Vonage currently has 3rd party trunk connectivity to the appropriate Selective Router but is in the process of gathering the necessary data to provide E911 service from the relevant ILECs and/or PSAPs.
6. For .27% of its customers, Vonage lacks direct trunk connectivity to the appropriate Selective Router. Vonage is currently attempting to gather the necessary information to order trunk connectivity to these Routers – or, having ordered trunks, is awaiting their installation.
7. For .32% of its customers, Vonage has been unable to provide 911 service because the relevant PSAP has refused to accept any VoIP 911 calls.

standard, and is not meant to imply that Vonage is providing those services or elements of the NENA i2 standard that are not presently available.

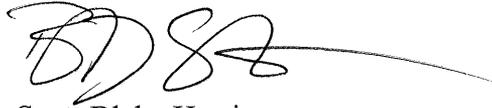
⁴ See note 3.

⁵ See note 3.

⁶ See note 3.

If any of the information we have provided is unclear – or if the Commission needs additional information – please do not hesitate to let us know.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'BDS', with a long horizontal flourish extending to the right.

Scott Blake Harris
Brita D. Strandberg
Counsel to Vonage America, Inc.

cc: Daniel Gonzalez; Amy Bender; Ken Moran, Dana Shaffer, Julie Veach; Rene Crittendon; Christi Shewman; Joe Casey; Kathryn Berthot; Chris Olsen; Mike Carowitz; Nicholas Alexander, Carol Simpson