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EX PARTE

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

RE: Implementation of the New and Emerging Technologies 911 Improvement Act of 2008, WC Docket No. 08-171

Dear Ms. Dortch:

On October 9, 2008, Kathleen Grillo and Leslie Owsley of Verizon met with Amy Bender, Legal Advisor to Chairman Kevin Martin. The purpose of the meeting was to discuss the above-referenced proceeding.

Verizon stated that since the Commission issued its VoIP 911 rules in 2005, today E911 service is available to more than 98 percent of customers of interconnected VoIP services. Given the success of the Commission's VoIP 911 rules, and the very tight timeframe specified by Congress for adopting rules to implement the NET 911 Act, Verizon stated that the Commission should adopt a straightforward rule requiring that, if an entity provides 911 capabilities to CMRS providers, it must also make such capabilities available to VoIP providers on the same rates, terms, and conditions. Verizon also discussed its proposed rules, attached to this letter.

Please contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Grillo".

Attachment

cc: Amy Bender

1. An interconnected VoIP provider that seeks capabilities to provide 9-1-1 and enhanced 9-1-1 service from an entity with ownership or control over such capabilities, to comply with its obligations under sections 9.1, 9.3, and 9.5 of the Commission's rules (47 C.F.R. §§ 9.1; 9.3; 9.5), shall, for the exclusive purpose of complying with such obligations, have a right of access to such capabilities, including interconnection, to provide 9-1-1 and enhanced 9-1-1 service on the same rates, terms, and conditions that are provided to a provider of commercial mobile service (as such term is defined in section 332(d) of the Communications Act of 1934 (47 U.S.C. § 332(d)).

2. Additional capabilities that are not required to be made available to a commercial mobile service provider but that are necessary for an interconnected VoIP provider to comply with its obligations under sections 9.1, 9.3, and 9.5 of the Commission's rules (47 C.F.R. §§ 9.1; 9.3; 9.5) shall be made available at the same rates, terms, and conditions as would apply if such capabilities were made available to a commercial mobile service provider.

3. An interconnected VoIP provider subject to sections 9.1, 9.3, and 9.5 of the Commission's rules (47 C.F.R. §§ 9.1; 9.3; 9.5) shall register with the Commission and establish a point of contact for public safety and government officials relative to 9-1-1 and enhanced 9-1-1 service and access.