



March 29, 2011

(Filed electronically)

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

Re: **Ex Parte Notice**  
WC Docket 05-196  
PS Docket 07-114

Dear Ms. Dortch:

On March 28, 2011, the Voice on the Net Coalition (VON) represented by Paula Boyd, Laura Carter and Bernard Aboba (by phone) of Microsoft, and Glenn Richards, Executive Director and Counsel for VON, met with Patrick Donovan, Tim May, Henning Schulzrinne, David Furth, David Siehl, Tom Beers and Stan Scheiner of the Public Safety and Homeland Security Bureau to discuss issues consistent with the comments filed by VON in the above-referenced dockets.

In particular, VON discussed how it proactively worked with industry groups and NENA in the development of E911 services for VoIP. VON also noted that certain IP-enabled services and devices, including non-interconnected VoIP services, may not be technically capable of providing E911, because of the difficulties in identifying the location of users. VON also noted that consumer disclosures should be encouraged to inform consumers of the 911 limitations of a product or service. In addition, to the extent E911 or next generation 911 obligations are extended, it should be considered only for those voice applications or offerings that are designed to provide the essential qualities of a telephone service which is the ability to call anyone and receive a call from anyone in the world. VoIP offerings such as in-game chat and VoIP over IM allow you to engage a finite group of friends, and do not allow you to access the world at large. Finally, we discussed how certain capabilities might change once all PSAPs were IP-enabled and the funding challenges to implementing NG911. VON said it would continue working with the Commission, industry and NENA to help develop 911 solutions for IP voice communications applications and services.



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Please contact me directly if you have any questions.

Sincerely,

/s/

Glenn S. Richards  
Executive Director

cc: Patrick Donovan (by email)  
Tim May (by email)  
Henning Schulzrinne (by email)  
David Furth (by email)  
David Siehl (by email)  
Tom Beers (by email)  
Stan Scheiner (be email)