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FCC Mail Room

May 11, 2011

Marlene H. Dortch  
Office of Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20554

Re: VoIP E911 Compliance Letter of FiberNet Monticello.  
WC Docket Nos. 05-196, 04-36

Dear Ms. Dortch:

FiberNet Monticello ("FNM") hereby submits this letter in compliance with the Commission's First Report and Order in the above referenced dockets (the "VoIP 911 Order").

FNM is offering fixed, non-nomadic telephone service utilizing internet protocol technology ("VoIP") service to customers with customer premises equipment which requires said protocol. FNM provides 911/E911 service to 100% of its customers in compliance with the Federal Communications Commission's ("Commission") rules. FNM does not plan to offer or provide nomadic VoIP service.

As a CLEC, FNM is authorized by the Minnesota Public Utilities Commission to provide local exchange service in Minnesota, FNM is currently interconnected with the public switched telephone network ("PSTN") and the Wireline E911 Network.

**I. Scope of Coverage of 911 Solution.**

All FNM's customers have access to 911 service in compliance with the rules established by the Commission in its VoIP 911 Order.

**A. 911 Routing Information/Connectivity to Wireline E911 Network.**

FNM routes all 911 calls through FNM's local switch and over-separate dedicated 911 interconnection trunks to the appropriate selective router for delivery to the appropriate PSAP. As such, 100% of FNM's transmission of 911 calls is delivered through the use of ANI via the dedicated wireline E911 network.

**B. Transmission of ANI and Registered Location Information.**

FNM sends all 911 calls to the appropriate selective router where a database "dip" occurs, in turn causing appropriate name, address, and number information to be routed to the appropriate PSAP along with the 911 call. FNM utilizes this process on all of its 911 calls. Accordingly, for all FNM 911 calls the ANI and the 911 caller's registered location is transmitted to the PSAP. All of the answering points to which FNM

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transmits 911 information are capable of receiving name, address and phone number relating to 911 calls (i.e., are E911 capable).

**C. The 911 Caller's Registered Location Will be Available to the PSAP From or Through the Appropriate ALI Database.**

FNM will submit each customer's service address (registered location) information to the appropriate ALI database prior to initiating service. With respect to any and all changes in the customer's registered location, FNM will update the ALI database in a timely manner.

**II. All FNM's Customers will be Advised and Must Acknowledge That They have Been Informed of and Understand the Limitations of FNM's E911 Service Before VoIP Service Will be Provided.**

FNM requires all customers to sign an agreement for services ("Service Agreement"). The Service Agreement prohibits customers from moving or relocating FNM provided customer premises equipment. The Service Agreement also informs customers that FNM's telephone service, including E911 service, will not operate if the FNM provided customer premises equipment is moved to another location. The Service Agreement further informs customers that in the event of a power outage FNM's telephone service including E911 service may not be operable.

FNM also requires its customers to sign an E911 Disclosure Notice before VoIP service will be provided. The E911 Disclosure Notice explains in plain language the circumstances under which FNM's E911 service may not be available. Such circumstances include the moving or relocation of FNM provided customer premises equipment, the suspension of FNM VoIP service, a disruption of the broadband connection and a power outage. By signing the E911 Disclosure Notice FNM's customers acknowledge and agree that they have been advised and understand FNM's E911 service limitations. FNM keeps a record of the affirmative acknowledgements by every customer.

Prior to initiation of service FNM will provide its customers with stickers to be placed on and/or near each telephone and the FNM provided customer premises equipment reminding customers of the FNM E911 service limitations.

FNM VoIP customers are informed by FNM that the VoIP Service provided by FNM is a fixed, non-nomadic service that may be used only at the customer's service address (i.e., registered location). FNM will inform its VoIP customers: (1) at the time of the initial service request, (2) at the time of installation, (3) in the Service Agreement, and (4) in the E911 Disclosure Notice.

**III. Obtaining Initial Registered Location Information.**

FNM obtains registered location information for all of its customers at the time of the customer service request. A customer cannot obtain service from FNM without first providing a service address, which also serves as the registered location. When new subscribers order VoIP service, they will be required to provide and confirm the physical location of their service address during the order process. This will be required whether service is requested over the telephone, via the internet or in person at a FNM customer service location. In all cases an installation date for each customer will be arranged. As part of the installation service call, FNM technicians will verify that the address information that the customer provided FNM during the initial service request is correct. In sum, FNM will collect service location (registered location) information from 100% of its customers prior to the initiation of service.

**IV. Obtaining Updated Registered Location Information.**

As stated, FNM does not offer nomadic service to its customers. If a customer desires to move to a new location the customer must notify FNM and disclose the new service location. At the time of service installation, FNM provides to its customers an E911 Disclosure Notice (i.e., an acknowledgement form) and stickers detailing the requirement that a customer notify FNM in the event the customer desires to relocate service to a new address (registered location).

Customers can provide notice of their relocation to FNM by calling a FNM customer service representative or visiting a local FNM retail office. When the customer notifies FNM of the customer's intent to relocate, FNM will schedule a new installation appointment and dispatch a technician to provision VoIP service at the new location. As with an initial installation, the technician will install, if necessary, a terminal adapter and perform any necessary inside wiring work to ensure that the VoIP service operates throughout the customer premise. Apart from service activation, this service call also allows FNM to verify the customer's new service address (registered location).

**V. Technical Solutions for Nomadic Subscribers.**

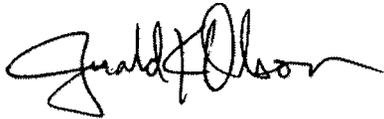
FNM's VoIP service is a fixed, non-nomadic service. FNM has no plans to offer nomadic service in the future. FNM's VoIP service is designed to operate only when provided over FNM's facility based broadband access and the switching and routing facilities provided by FiberNet Monticello. Accordingly, devices used in connection with FNM's VoIP service are not designed to be moved or relocated. The technical solutions that have been designed "to ensure that subscribers have access to 911 service whenever they use their service nomadically" are not applicable to the fixed, facilities-based VoIP service provided by FNM.

VI. **FNM Employee Responsible for E911 Compliance.**

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Please contact the undersigned at the telephone number listed above if you have any questions about this filing.

Respectfully submitted,



Jerry Olson  
Interim General Manager

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