

**Nneka Ezenwa**  
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March 27, 2012

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**Ex Parte**

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

**Re: IP-Enabled Services, WC Docket No. 04-36; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196**

Dear Ms. Dortch:

This letter provides an update on Verizon's continued compliance with the Commission's VoIP 911 provisioning requirements. Verizon fully supports the Commission's efforts to promote public safety through its VoIP 911 requirements, and Verizon remains fully compliant with the Commission's Part 9 VoIP 911 rules.

In 2005, Verizon notified the Commission of its plans to voluntarily implement software-based automatic detection based processes designed to detect when an interconnected VoIP user may have moved her or his location. Verizon implemented this feature in order to provide additional capability beyond what the Commission's then-new VoIP 911 rules require. At the time, Verizon's consumer customers were the principal focus of this feature. But as of April 2009, Verizon no longer offers any over-the-top residential interconnected VoIP service. To the extent Verizon does currently offer consumer interconnected VoIP services, its FiOS Digital Voice service utilizes the traditional Automatic Location Information database method and, therefore, Verizon has not deployed the automatic detection capability for its FiOS VoIP service.

For enterprise services, the market and technology have moved beyond where they were in 2005. To the extent Verizon offers nomadic enterprise interconnected VoIP services, they are fully compliant with the Commission's VoIP 911 rules and will remain so. Many of Verizon's enterprise customers, however, have complained that the supplemental automatic detection capability imposes burdens that no other competing provider requires of its enterprise customers. Equipment vendors, moreover, have not made the separate automatic detection capability a standard feature of their products. And while the Commission encouraged other VoIP providers to adopt similar measures, none have. As a result, Verizon's enterprise services, never the focus of the automatic detection capability, have been the only interconnected VoIP services in the market with the feature. Finally, the detection feature has proven to be unnecessary for

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Verizon's enterprise customers, most of whose end users have large desktop phones that are not intended to be used nomadically in the first place.

For these reasons, Verizon is discontinuing the automatic detection feature for its interconnected VoIP services. As we have explained, Verizon remains in *full* compliance with the Commission's Part 9 rules – including the registered location requirements of Section 9.5 of the rules – with respect to all of its interconnected VoIP customers.

Please contact the undersigned if there are questions concerning this filing.

Respectfully submitted,

A handwritten signature in black ink, reading "Neka Ezenwa". The signature is written in a cursive, flowing style with a large initial 'N'.