

Nneka Ezenwa
Executive Director
Federal Regulatory Affairs



1300 I Street, NW
Suite 400 West
Washington, DC 20005
(202) 515-2466
(202) 336-7922 (fax)
nneka.n.ezenwa@verizon.com

May 29, 2012

VIA ECFS

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

Re: **Notice of Oral *Ex Parte* Presentation**
Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules, GN Docket No. 11-117; Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

On May 24, 2012, Robert Morse and the undersigned of Verizon discussed matters relating to the above-referenced proceedings with Commission staff via telephone. Participating Commission staff were Deputy Bureau Chief David Furth and Patrick Donovan of the Public Safety and Homeland Security Bureau, and Chief Technologist Henning Schulzrinne of the Office of Strategic Planning and Policy Analysis.

The parties discussed Verizon Wireless' plans for incorporating automatic location information ("ALI") capability into Voice over LTE ("VoLTE") technology. As stated in its earlier comments, Verizon intends to use Assisted-GPS ("A-GPS") with mobile VoLTE for E-911 purposes, instead of customer-provided registered location.¹ Many VoLTE-capable handsets will likely be dual-mode VoLTE-CDMA, for which 911 calls will be routed via CDMA and would be subject to the existing Part 20 wireless E-911 rules.² Many handsets will eventually be LTE-only, however, or may operate in a geographic area in which neither Verizon Wireless nor its roaming partners have CDMA coverage. Use of an ALI solution such as A-GPS for VoLTE is an appropriate method of providing E-911 location capability.

¹ See Verizon Comments in GN Docket No. 11-117, PS Docket No. 07-114, and WC Docket No. 05-196, filed Oct. 3, 2011, at 7.

² See 47 C.F.R. § 20.18(a) et seq.

The Verizon representatives expressed the view that the Commission's current regulatory framework allows for Verizon Wireless' planned approach. "Registered location" is defined simply as "[t]he most recent information obtained by an interconnected VoIP service provider that identifies the physical location of an end user," which does not preclude a mobile VoIP provider from using an ALI x/y coordinate to comply with the rule.³ Moreover, in adopting the VoIP 911 rules for interconnected VoIP, the Commission recognized that a fixed customer-provided address may not be an appropriate registered location for a mobile wireless service.⁴ Finally, this interpretation is consistent with the legislative history of the NET 911 Act, which ratified the VoIP 911 rules.⁵ The House Report stated that "[a]s mobile VoIP develops into a full-fledged, widely-used service, providers should strive to use E-911 technologies that comply with the same accuracy standards *as wireless services*."⁶

Finally, the Verizon representatives expressed the view that it would be appropriate for the Commission to grant T-Mobile's Petition for Clarification in relevant part, and affirm that a mobile VoIP provider can meet any existing Part 9 obligations by employing an ALI solution like A-GPS.⁷

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

Respectfully submitted,



cc: David Furth
Patrick Donovan
Henning Schulzrinne

³ See 47 C.F.R. § 9.3.

⁴ See *IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245, ¶ 46 n.146 (2005) ("Nothing in these rules ... prevents an interconnected VoIP provider from automatically obtaining an accurate Registered Location if it is capable of doing so"); *id.* ¶ 46 n.148 (stating that registered location "in *almost all* cases" (emphasis added) will be a street address but "recogniz[ing] ... that wireless broadband technologies may increase the possibility that a user's location is not associated with a street address ...").

⁵ New and Emerging Technologies 911 Improvement Act of 2008, Pub. L. No. 110-283, 122 Stat. 2620, § 101 (2008) (codified at 47 U.S.C. § 615a-1(a)).

⁶ See H.R. Rep. No. 110-442, at 14 (emphasis added).

⁷ See T-Mobile Petition for Clarification in WC Docket No. 05-196, filed July 29, 2005, at 5, 10.