

**Greg Rogers**  
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August 13, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW Room TW-A325  
Washington, DC 20554

***Re: Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules, PS Docket No. 07-114; Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196; Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102; Framework for Next Generation 911 Deployment, PS Docket No. 10-255***

Dear Ms. Dortch:

On Thursday August 9, 2012, Ray Paddock, Vice President of Emergency Voice Services, and I of Bandwidth.com met with Henning Schulzrinne, David Furth, David Siehl, Erika Olsen and Jerome Stanshine of the Public Safety and Homeland Security Bureau; and Cheryl King of the Consumer and Government Affairs Disability Rights Office.

During our meeting we discussed the Commission's and Bandwidth.com's efforts to advance emergency services in the context of: 1) Next Generation 911 networks in an Internet Protocol environment; 2) Text-to-911 services, including Bandwidth.com's proposal to serve as a clearinghouse provider to facilitate multiple Text-to-911 delivery methods; 3) efforts to support emergency calling for one-way VoIP services in an economically viable and technically effective manner; 4) and finally, issues associated with Multi-line Telephone Systems ("MLTS"). Bandwidth provided updates on its real-world experience as an integrated provider of wholesale and retail VoIP services combined with its role as an emergency services provider to carrier and VoIP provider customers, which among other things included details Bandwidth's implementation of the Alabama Next-Gen 911 network. Additionally, Bandwidth provided perspective on the possible financial considerations that may be associated with expanding the current definition of Interconnected VoIP and its proposed clearinghouse capabilities for Text-to-911 traffic in the near term and as a component of the evolution to Next Generation 911 networks. The attached materials were used to discuss the topic of MLTS services with staff during the meeting as well.

In accordance with Section 1.1206(b), this *ex parte* notification is being filed electronically for inclusion in the public record of the above proceeding. Should there be any questions or concerns regarding this filing, please direct them to the undersigned.

Sincerely,

*/s/ Greg Rogers*

Greg Rogers

cc: Henning Schulzrinne  
David Furth  
David Siehl  
Erika Olsen  
Cheryl King  
Jerome Stanshine  
Patrick Donovan

Attachment