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EX PARTE OR LATE FILED

March 12, 2014

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 Lake Communications  
WC Docket Nos. 05-196, 04-36

Dear Ms. Dortch:

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

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

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

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

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

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

All 911 calls from LAKE customers are routed from the switch to dedicated 911 interconnection trunks to the appropriate selective router for delivery to the appropriate PSAP. As such, 100% of LAKE's transmission of 911 calls is delivered through the use of ANI via the dedicated wireline E911 network.

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

All 911 calls are routed 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. LAKE utilizes this process on all of its 911 calls. Accordingly, for ANI for all 911 calls and the caller's registered location is transmitted to the PSAP. All of the PSAPs 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.**

LAKE 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, LAKE will update the ALI database in a timely manner.

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

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

LAKE 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 LAKE's E911 service may not be available. Such circumstances include the moving or relocation of LAKE provided customer premises equipment, the suspension of LAKE VoIP service, a disruption of the broadband connection and a power outage. By signing the E911 Disclosure Notice LAKE's customers acknowledge and agree that they have been advised and understand LAKE's E911 service limitations. LAKE keeps a record of the affirmative acknowledgements by every customer.

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

LAKE VoIP customers are informed by LAKE that the VoIP Service provided by LAKE is a fixed, non-nomadic service that may be used only at the customer's service address (i.e., registered location). LAKE 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.**

LAKE obtains registered location information for all of its customers at the time of the customer service request. A customer cannot obtain service from LAKE 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 is required whether service is requested over the telephone, via the internet or

in person at a LAKE customer service location. In all cases an installation date for each customer will be arranged. As part of the installation service call, LAKE technicians verify the address information provided by the customer during the initial service request is correct. In sum, LAKE 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, LAKE does not offer nomadic service to its customers. If a customer desires to move to a new location the customer must notify LAKE and disclose the new service location. At the time of service installation, LAKE provides to its customers an E911 Disclosure Notice (i.e., an acknowledgement form) and stickers detailing the requirement that a customer notify LAKE in the event the customer desires to relocate service to a new address (registered location).

Customers can provide notice of their relocation to LAKE by calling a LAKE customer service representative or visiting a local LAKE retail office. When the customer notifies LAKE of the customer's intent to relocate, LAKE 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 LAKE to verify the customer's new service address (registered location).

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

LAKE's VoIP service is a fixed, non-nomadic service. LAKE has no plans to offer nomadic service in the future. LAKE's VoIP service is designed to operate only when provided over LAKE's facility based broadband access and the switching and routing facilities. Accordingly, devices used in connection with LAKE'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 LAKE.

**VI. LAKE 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,



Jeff Roiland  
CEO

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