



July 1, 2011

(Filed electronically)

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

Re: **Ex Parte Notice**
WC Docket 05-196
PS Docket 07-114

Dear Ms. Dortch:

On June 30, 2011, Glenn Richards, Executive Director of the Voice on the Net Coalition (VON), met with Louis Peraertz, Legal Advisor for Commission Clyburn, and on July 1, 2011, Mr. Richards met with Mark Stone, Chief of Staff to Commissioner Copps and James Bangasser, legal intern for Commissioner Copps, to discuss issues raised in the above-referenced dockets and which were addressed in VON's comments.

In particular, VON discussed how changing the definition of interconnected VoIP now found in Section 9.3 of the Commission's Rules in order to apply E911 requirements to IP services that can make calls to US telephone numbers was technically infeasible, would create confusion for consumers, impose substantial costs on services that are otherwise free or very inexpensive, impede innovation, and unnecessarily disrupt the established regulatory structure for interconnected VoIP that has developed during the past six years. The established definition for interconnected VoIP has not only been used in numerous FCC VoIP rulemakings, but has also been relied upon by states that have addressed the regulation of interconnected VoIP. VON also noted that one-way VoIP services and devices may not be technically capable of providing E911 since phone numbers are not always assigned to customers and position location information would not be available. Moreover, customers do not expect E911 calling capability from one-way VoIP services, which are not replacements for traditional phone services. In addition, one way VoIP service providers typically provide notice to customers on their websites disclosing the unavailability of emergency calling services. In VON's opinion, it is premature to propose a specific change to the definition of interconnected VoIP for the limited purpose of requiring E911 services. The Commission should instead seek comments without proposing a specific rule change.



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Please contact me directly if you have any questions.

Sincerely,

/s/

Glenn S. Richards
Executive Director

cc: Louis Peraertz (by email)
Mark Stone (by email)
James Bangasser (by email)