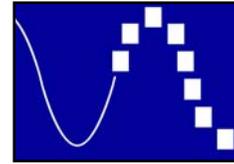


October 10, 2007



The VON Coalition

The Hon. Edward Markey  
Chairman, House Subcommittee on Telecommunications

The Hon. Fred Upton  
Ranking Member, House Subcommittee on Telecommunications

Dear Reps. Markey and Upton:

We are writing in support of H.R. 3403, the 911 Modernization and Public Safety Act.

Dialing 911 can be the most important call a person ever makes. That is why VoIP providers have made providing 911 emergency service in an Internet world a paramount priority. Interconnected VoIP providers have gone to extraordinary lengths to make astonishing progress under a very ambitious timetable. We are proud to tell you that Interconnected VoIP services now provide E911 to more than 97 percent of their subscribers -- the fastest and broadest onetime implementation of E911 in the history of public safety. And America is safer for it. As a result of this unprecedented effort, Americans who dial 911 using interconnected VoIP services can now rest assured they can reach help in an emergency. It is a particularly remarkable achievement considering that no underlying network connectivity provider can yet offer VoIP providers the ability to connect to all selective routers nationwide.

H.R. 3403, the 911 Modernization and Public Safety Act sponsored by Congressman Gordon and cosponsored by Congressmen Pickering, Shimkus and Eshoo, is important public safety legislation that has now been worked on in two Congresses. Critically, this bill:

- Gives public safety, interconnected VoIP providers and others involved in handling 911 calls the same liability protections when handling 911 calls from interconnected VoIP users as from mobile or wired telephone service users.
- Gives interconnected VoIP providers access to the same tools for implementing 911 and E911 as mobile service providers, on the same rates, terms and conditions. This ensures that 911 component suppliers receive a fair price, including a reasonable profit, but precludes profiteering on components for interconnected VoIP 911 services or use of critical 911 components as a tool to delay competition from interconnected VoIP.
- Advances the development of next generation IP-based 911 systems, so that we can have a 911 system that uses 21st century technology, not network technology from the 1960s.
- Precludes the FCC from creating a technology-specific 911 and E911 mandate.
- By utilizing the FCC's definition of interconnected VoIP services, maintains the focus of 911 and E911 obligations on those services that are telephone replacement services.

These are critical steps forward. We think the bill can be further improved, and lives saved, by adding language allowing VoIP providers to route 911 calls to the correct PSAPs using the method most likely to achieve accurate and reliable routing – rather than having to disconnect consumers if they take their service to an area where there is not selective router access.

Interconnected VoIP providers are not seeking special favors through this bill. We are already required to provide 911 and E911 service (along with meeting CALEA requirements, contributing to universal service and telecommunications relay services, meeting federal disabilities access

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requirements, CPNI requirements, and paying FCC regulatory fees). At this point, we seek only to have the same tools and protections as all other communications providers when we and public safety implement 911 and E911 service.

Thank you for your continued support of accelerating life-saving E911 solutions across the country and for enabling consumers to take advantage of transformative technologies like VoIP throughout the country. We look forward to working with the committee on this critical legislation and in seeing it's speedy passage.

Sincerely,

**The VON Coalition**

**About the VON Coalition:**

The Voice on the Net or VON Coalition consists of leading VoIP companies, on the cutting edge of developing and delivering voice innovations over Internet. The coalition, which includes BT Americas, CallSmart, Cisco, Covad, EarthLink, Google, iBasis, i3 Voice and Data, Intel, Intrado, Microsoft, New Global Telecom, PointOne, Pulver.com, Skype, T-Mobile USA, USA Datanet, and Yahoo! works to advance regulatory policies that enable Americans to take advantage of the full promise and potential of VoIP. The Coalition believes that with the right public policies, Internet based voice advances can make talking more affordable, businesses more productive, jobs more plentiful, the Internet more valuable, and Americans more safe and secure. Since its inception, the VON Coalition has promoted pragmatic policy choices for unleashing VoIP's potential. <http://www.von.org>