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# 511 Emerging Technology Issues: VoIP and Wi-Fi



Version 3

Report to the Future 511 Technologies and Services Task Force  
December 2005

Published by the 511 Deployment Coalition



**TABLE OF CONTENTS**

**1. HOW CAN VOIP AND WI-FI VOIP WORK WITH 511 ..... 1**

**2. INTERNET PROTOCOL..... 1**

**3. VOICE OVER INTERNET PROTOCOL ..... 1**

**4. VOIP MARKET GROWTH AND INVESTMENT..... 2**

**5. LARGELY UNFETTERED BY REGULATIONS..... 3**

**6. N11 DIALING USING VOIP..... 4**

**7. VOIP PROVIDERS TRY TO MITIGATE THE 911 ISSUE ..... 5**

**8. WI-FI VOIP OPENS THIS ISSUE FURTHER ..... 6**

**9. WHAT DOES THIS MEAN TO 511?..... 6**

**10. SCENARIOS FOR SOLVING 511 VOIP CALL ROUTING..... 7**

**11. FCC PLEADINGS ON E911 AND N11 DIALING..... 8**

**12. RECOMMENDATIONS FOR 511 DEPLOYERS: ..... 9**

**APPENDIX A – SAMPLE LISTING OF VOIP RESIDENTIAL PROVIDERS IN THE US AS OF  
DECEMBER 2005 ..... 10**

**13. APPENDIX B – 511 SERVICES’ BACK-DOOR NUMBERS..... 14**

## 1. How Can VoIP and Wi-Fi VoIP Work With 511

Before answering the question of how Voice over Internet Protocol (VoIP) and Wi-Fi can work with 511, we must first understand exactly what Internet Protocol (IP), Wi-Fi and VoIP are.

## 2. Internet Protocol

IP is the method by which data is sent from one computer to another on the Internet. Each computer on the Internet has at least one unique IP address that identifies it on the Internet. When data is sent or received, the message is divided into little chunks called “packets.” Each of these packets contains both the sender's Internet address and the receiver's address. Packets are sent to a computer that serves as a gateway and knows about a small part of the Internet. The gateway reads the destination address and forwards the packet to an adjacent gateway and then to another and another and so forth until one gateway recognizes the packet as belonging to a computer within its immediate domain. That gateway then forwards the packet directly to the computer whose address is specified.

Because a message is divided into a number of packets, each packet can, if necessary, be sent via a different route across the Internet. Packets can arrive in a different order than the order they were sent in. The IP just delivers them. It is up to another protocol – the Transmission Control Protocol (TCP) to put them back in the right order.

## 3. Voice over Internet Protocol

VoIP, also called Internet telephony, is the technology that makes it possible to have a telephone conversation over the Internet or a dedicated (closed) IP network instead of dedicated voice transmission lines. This eliminates the need for circuit switching and the associated bandwidth used for signaling. Instead, a system using packet switching is used. IP packets carrying voice data are sent over the network only when data needs to be sent, such as when a caller is talking. VoIP traffic does not necessarily have to travel over the public Internet; it may also be deployed on private IP networks, such as a company's Intranet or a telecommunications carrier's IP network.

VoIP for individual users is utilized through an existing broadband connection to the Internet (such as DSL or cable modems). This requires an analog telephone adapter (ATA) to connect a telephone to the broadband Internet connection. Companies such as Vonage, AT&T CallVantage and many others<sup>1</sup> use VoIP to offer unlimited calling to the

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<sup>1</sup> The number of providers of VoIP service differs depending on the source. The website <http://www.telecom-portal.com/>, states that there are 368 VoIP companies doing business in the United States, while the site <http://www.VOIP-info.org> shows only 55 doing business on a residential level. A list

US, and sometimes to Canada or select countries in Europe and Asia, all for a flat monthly fee. This gives the caller the ability to make and receive calls from anywhere in the world, at no extra cost. Calls travel via IP and do not incur charges as they would over the Public Switched Telephone Network (PSTN). In addition, since the VoIP registered phone number travels with your telephone adapter (a virtual phone number), you can place and receive calls anywhere you have access to a broadband connection to the Internet. This also means that you may have a telephone number registered in the US and place and receive calls on that number from most anywhere in the world!

At this time, there is no VoIP industry association where one can track the number of VoIP providers or discuss common issues and solutions such as N11 dialing.

#### **4. VoIP Market Growth and Investment**

VoIP is considered one of the more promising IP applications working its way into the main stream. While not without problems, VoIP promises a more efficient and cost-effective replacement for traditional wireline telephony while allowing for the possibility of data rich enhancements to voice communication. The VoIP industry is in an active growth state, largely unfettered by regulation, with firms valued at multi-billion dollar levels and a host of technology companies vying for positions in the growing market of VoIP applications and carriers. Many consumers are attracted to VoIP for its low cost and improved data features.

The market for VoIP is growing rapidly. Skype, the world's largest VoIP provider and recently purchased by eBay for \$2.3 Billion, reports to have over 57 million users worldwide and a current growth rate of 150,000 plus users per day. The Yankee Group reports that Skype is the number one VoIP provider in North America accounting for 35.8% of all VoIP calls in 2004. Other major VoIP providers are Vonage, Primus and AT&T CallVantage. IDC research indicates that, in North America alone, more than 30 million households will use VoIP for an estimated 1.5 trillion minutes a year by 2009. Synergy Research Group Inc. reports that the market for VoIP is set to approach \$2 billion in 2005. Residential phone service is leading this strong growth trend, with rapid adoption in the U.S., Japan and Western Europe.

In addition to growing adoption in residential markets, the business sector is beginning to accept VoIP as an alternative to traditional telecom solutions. As corporations outgrow their current phone systems, or hardware has to be replaced or repaired, more and more are turning to VoIP as their voice technology of choice. A Network General Corporation survey of network IT personnel cited VoIP as the most important network initiative in the near future. However, growth in this area is more deliberate due to VoIP issues of security and reliability, but as these problems are addressed, it is expected that the business sector will willingly adopt VoIP technology. Investment in software and hardware continues to grow, Synergy Research Group Inc. reports that the market for hardware and software sold to corporations and other enterprises grew 78% to \$3.07

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of these 55 companies is attached as Appendix A – Sample Listing of VoIP Residential Providers in the US as of December 2005.

billion last year, with an expected rise of \$4.42 billion this year and an expected \$11 billion next year.

New large technology players are becoming active in VoIP markets. AOL has recently launched their "TotalTalk" VoIP service. AOL reports that this service will include the usual "menu" of features offered by other VoIP companies such as voicemail, caller ID, call waiting and voicemail integrated with Email. Microsoft recently announced that it is partnering with Qwest Communications to enhance Qwest's current VoIP service, OneFlex, by integrating VoIP with email, instant messaging, collaboration and desktop services. Meanwhile, online services have entered the fray; EBay is planning to use Skype services to enhance their buyer and seller services. Search engine giants Yahoo! and Google are expected to offer VoIP services.

According to Jupiter Research, 20.4 million US households will subscribe to a VoIP-based broadband telephony service by 2010. This is a remarkable 17-fold increase from the 1.2 million subscribers in 2004.

## **5. Largely Unfettered by Regulations**

VoIP has largely been left alone by the FCC and other government regulations. VoIP providers operate unencumbered by the taxes, franchising, and fees that traditional telecom providers are required to pay. The major regulatory hurdle has been the E911 requirement from the FCC. In June of 2005, the FCC mandated that all VoIP carriers provide E911 capabilities to their subscribers within 120 days or have their services shut down. With this mandate, the FCC has demonstrated understanding of the challenges facing VoIP carriers and has twice extended the deadline for compliance due to VoIP carriers' efforts to comply.

VoIP is not without its potential pitfalls, VoIP providers are obviously unwelcome competitors for traditional wireline telephone companies and several issues must be addressed before widespread adoption of VoIP takes place. The FCC is constantly petitioned by the telecom industry to treat VoIP as standard telephony, yet to this point it has largely resisted. In addition to the specter of future government regulations, VoIP providers face resistance from traditional telecom companies on other fronts. VoIP providers Vonage, theglobe.com and Voiceglo holdings have recently been sued in a patent infringement lawsuit by Sprint/Nextel. Security and reliability are issues seen as deterring the adoption of VoIP as a replacement for traditional telecommunications. Jim Vale of Network General Corporation of San José, California, (a firm that does consulting on networking issues), has found a niche doing VoIP feasibility studies for large corporations and characterizes his clients' approach to VoIP as "cautious" with the design and testing phases of implementation taking large amounts of time due to the mission critical nature of telecommunications. Irregardless of these factors, VoIP continues to grow at remarkable rates.

## 6. N11 Dialing Using VoIP

N11 and other non-location specific dialing is one of the larger problems for VoIP service providers. Since the VoIP telephone and its associated number do not “live” attached to a particular telephone circuit and thus a physical address, when a user dials a short-code number, such as 911, the PSTN circuitry does not know where to route the call. Since there is no telephone circuit registered to the number, the VoIP provider routing the call is not able to use the regular look-up tables that traditional telephone carriers use to send the call to the nearest PSAP, or in our case, 511 service.

Further discussion with VoIP providers reveals that a similar issue arises when a VoIP caller tries to dial a “nationally distributed” toll-free number. Nationally Distributed toll-free numbers differ from what we might think of as a National toll-free number in that the number is actually routed based on the caller’s location.

An example of one such use is the toll-free number for the Poison Control Center. Nationally, Poison Control uses 800-222-1222. Unbeknownst to the caller, when this toll-free number is dialed, the telephone service routes the call based on the user’s NPA-NXX (area code and central office exchange). There are 62 Poison Control Centers using this toll-free number across the 50 states, the District of Columbia, US Virgin Islands and Puerto Rico.

A page on the FCC website pertaining to VoIP telephony states: “On February 12, 2004, the FCC found that an entirely Internet-based VoIP service was an unregulated information service. On the same day, the FCC began a broader proceeding to examine what its role should be in this new environment of increased consumer choice and what it can best do to meet its role of safeguarding the public interest.” This discussion was brought about due to the concern that VoIP users would not be able to access emergency services, or any services, which are not dialed using a traditional 7 or 10-digit telephone number.

On May 19, 2005, the FCC released an order requiring any VoIP provider that allows calls to be placed and received over the PSTN, to provide connectivity to local authorities through the 911 dialing code. A copy of the News Release for this order can be found at: [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-258818A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-258818A1.pdf)

Specifically, the order requires:

- Interconnected VoIP providers must deliver all 911 calls to the customer’s local emergency operator. This must be a standard, rather than optional, feature of the service.
- Interconnected VoIP providers must provide emergency operators with the call back number and location information of their customers (i.e., E911) where the emergency operator is capable of receiving it. Although the customer must provide the location information, the VoIP provider must provide the customer a means of updating this information, whether he or she is at home or away from home.

## 7. VoIP Providers Try to Mitigate the 911 Issue

VoIP providers have begun to move toward solutions for their geo-location deficiency, through “registration” of the user’s physical address. Vonage, for example, asks VoIP customers to “fill out a short form that tells us your actual physical address. When you dial 911, the call is routed to the local emergency personnel location designated for the address you register on file here.” Additionally, customers are reminded, “When you move or travel, you MUST provide your new location... Be aware that it can take several days before your new settings take effect.”

AT&T’s CallVantage customers see the following warning: “Service's 911 Emergency Dialing operates differently from traditional, wireline 911 Service. To insure correct emergency call routing, the Service Address provided to us MUST correspond to the physical location of your AT&T CallVantage Service phone.” There is no mention on the website about moving the physical telephone from one location to another.

The admonitions from both of these providers are based on the fact that the ATA can be moved from place to place, as you would a laptop computer. The adapter acts as an add-on to a DSL or cable modem, simply adding a port to which a telephone is connected.

It should also be noted that not all VoIP service providers provide the option of registering for 911 call routing, though this seems to be the direction that the providers are headed. Even so, those who offer the option are apparently leaving it to the consumer to register their location.

On March 23, 2005, the Texas Attorney General filed a lawsuit against Vonage alleging that “Vonage is deceiving consumers by not revealing in its television commercials, brochures or other marketing materials that customers must proactively sign up for 9-1-1 service. When consumers purchase the plan over the phone, call center salespeople also fail to disclose this important information. Even after signing up, there are limitations to the service that Vonage customers may never know about unless they read the fine print buried on the company’s Web site.” Details on the lawsuit are available at: <http://www.oag.state.tx.us/newspubs/releases/2005/032205vonagepop.pdf>

Based on the FCC decision of May 19, 2005, requiring that VoIP providers be able to route 911 calls properly, providers are making these “requested” registrations, mandatory. A discussion with Vonage indicates that VoIP providers see this mandatory address registration as a way to comply with the intent of the FCC order. However, there are still issues with this solution as the physical address of a customer’s ATA might differ from their billing address nor does it account for registrants moving without updating their registration information. Additionally, this compliance does not always require confirmation (unless it is attached to a billing method such as a credit card for verification). Therefore, a user might enter an incorrect address, either in error or deliberately and their 911 (or other location specific calls) will be routed to the facility near the address they entered, though it may be incorrect. Still, this is a step toward better knowing the physical location of a caller dialing an N11 number.

Vonage is also working with the National Emergency Numbering Association (NENA) to develop a reverse look-up solution that would route the call based on the callers NPA-

NXX for nationally distributed toll-free numbers (as noted in section 5). While this solution is under development, additional issues continue to surface, such as users who maintain a non-local telephone number (e.g., a subscriber from Connecticut might have a Florida telephone number). All of these issues must be mitigated for these solutions to work properly.

## 8. Wi-Fi VoIP Opens This Issue Further

The term Wi-Fi is short for “wireless fidelity” and is often used generically when referring to any type of 802.11 wireless network<sup>2</sup>. Recently, VoIP providers have begun taking steps to use Wi-Fi in combination with VoIP and Wi-Fi VoIP telephones have started to come to market. Some are hardware based, looking very much like cordless or cellular telephones, and others are software based, running as an application on your laptop computer.

In October 2004, Net2Phone announced the availability of a Wi-Fi handset for its VoIP customers. The Wi-Fi Handset enables users in corporate, residential and public Wi-Fi network environments to use VoIP calling “without wires.” In corporate and residential settings, users utilize their home or company Wi-Fi networks. In free public hotspots<sup>3</sup>, callers can make and receive calls when they are away from their home or office. Vonage and a number of other VoIP providers announced similar Wi-Fi handsets that they were bringing to market in the early fall 2005.

With this capability, a Wi-Fi VoIP user can “log on” to many Wi-Fi networks and have access to their Internet calling plan. This service is applicable to Wi-Fi hotspots, where anyone using a computer or Wi-Fi phone can simply log on to the network. There they are assigned a dynamic IP address for use when online. Their location is not registered, as they do not have to register with the Internet Service Provider – as one might with a fee-based provider such as T-Mobile or Boingo.

## 9. What Does This Mean to 511?

The only current solution available to 511 deployers is to advertise the “back-door” number of their individual 511 system for use by VoIP customers. Though this does provide a method for VoIP users to access the information, these numbers are different from state to state and system to system. Thus, we are left with the marketing of numerous numbers for each system with each “back-door” number being different from the next.

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<sup>2</sup> 802.11 - Refers to a family of specifications developed by the IEEE (Institute of Electrical and Electronics Engineers) for wireless LAN (Local Area Network) technology. 802.11 specifies an over-the-air interface between a wireless client and a base station or between two wireless clients.

<sup>3</sup> Current versions of these telephones are not equipped for manual login, such as to a password protected Wi-Fi hotspot. However, VoIP providers are designing in that direction.

The VoIP providers are starting to manage the 911 issue by requiring users to register their location and, in some cases, the phone number of their PSAP. Similar requirements and capabilities are beginning to be seen with 311 dialing (Vonage already offers this option) and for other N11 codes. This means that the providers are becoming more aware of these geographically-based services and the need to be able to route these calls efficiently. The providers need to be made aware of 511 and find a solution for routing these calls as well.

## 10. Scenarios for Solving 511 VoIP Call Routing

One might assume that 511 will follow the same tack as 911. There are considerations that are made for 911 because of its emergency response nature that are not always considered for other N11 services. Therefore, the 511 Deployment Coalition and deployers should consider these options to assure proper coordination:

- Establish a dialog with the VoIP providers, either individually or through a consortium, to coordinate a solution for 511 call routing. This would include discussion of the “registration” issues for when the caller moves from one location to another on a regular basis.
- Investigate the option of a 511 VoIP clearinghouse number, where VoIP providers translate *all* 511 calls to a single nationwide toll-free number to act as a switching point for 511 VoIP calls. From this point, the caller would select to which 511 service they would like to be connected.
- Work with VoIP providers for solutions to geo-locating VoIP callers through their IP address or some other means. This could entail enabling GPS tracking for VoIP adapters and Wi-Fi VoIP phones, similar to the way new cell phones provide tracking for 911. A parallel notion would be to ask Wi-Fi Hotspot owners to provide the “physical” addresses of their routers to enable geo-locating the service address. However, it is unknown whether Hotspot providers or ISPs would be responsive to providing this information. It should be noted that there have been some discussion on consumer “bulletin boards” about the perceived and expected anonymity of an IP connection.
- Communicate with the FCC the need for this coordination of 511 and other N11 services as they continue their discussions of VoIP regulations and considerations.

Discussions with Vonage have indicated a willingness to help route 511 calls in a similar manner to the short-term solution for 911 calls – routing the calls according to the registered address of the VoIP user and correlating this with a translation table for the proper terminating (Back-Door) numbers of the 511 systems. Vonage states that this process would allow both statewide and regional 511 system callers to have their calls answered properly and offered to assist with the development of this solution.

With this suggestion of establishing a routing table for 511 services, Vonage has indicated a willingness to assist in the process of routing 511 calls to the proper service. Additional research and work is required to determine the precise requirements of

Vonage and other VoIP providers including what message might be delivered should a caller dial 511 from an area where there is no 511 service. In traditional phone services, callers receive a message that their call cannot be completed as dialed, but in VoIP the service might just sit silently waiting for the remaining digits to be dialed.

It must be noted that such as translation table must:

1. Be updated and maintained on a regular basis to insure the proper terminating numbers are available. This information may include a decision on whether to route to a toll-free number or a local number where available.
2. Be properly coordinated with local implementers according to the coverage areas for their systems (i.e. by state, county or other delineating point between one system and another).
3. Be distributed to all or as many as possible, VoIP carriers with registered customers in the United States.

With all of the above noted, Vonage has since declined to return numerous phone and email inquiries into continuing along this path. Contact has been made instead with both AT&T CallVantage and Packet8 for similar discussions. Additionally, a dialog has begun with the National Emergency Numbering Association (NENA) regarding their work with other “nationally distributed” numbering solutions (see below).

## **11. FCC Pleadings on E911 and N11 dialing**

On August 31, 2005, the FCC established a pleading cycle for petitions for reconsideration and / or clarification and / or waivers files in the IP-Enabled services and E911 requirements for IP-Enabled service providers’ proceedings<sup>4</sup>. This comment cycle was brought about by a certain number of carriers seeking reconsideration, clarification or exemption from the FCC’s requirements for IP-enabled service providers adopted in the First Report and Order in WC Docket No. 04-36.5 Within the responses, NENA commented that it is working with other single number services (those with nationally distributed toll-free numbers such the National Poison Control Center and Suicide Hotline), to inform and encourage the FCC to work on long term solutions for VoIP call routing where geographic information, such as customer entered addresses or NPA-NXX codes, are not viable for determining the location of the caller.

On September 15, 2005, the 511 Deployment Coalition added its response to the pleadings, concurring with the NENA submission and noting that the 511 assignment by the FCC might be marginalized by the growth of VoIP services, if action is not taken on

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<sup>4</sup> WC DOCKET NOS. 04-36, 05-196 - [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DA-05-2398A1.doc](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-05-2398A1.doc)

<sup>5</sup> *IP-Enabled Services*, WC Docket No. 04-36, *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking, FCC 05-116 (rel. June 3, 2005).

N11 dialing. A copy of this submission has been posted at:

<http://www.deploy511.org/docs/FCC%20%202005-196%20511%20Deployment%20Coalition%20Comments%2009-15-05.doc>

## **12. Recommendations for 511 Deployers:**

- Publicize the “back-door” number for the 511 service as an alternate method of accessing information. This solution may be used for both VoIP callers and 711 users where the 711 Relay Center is located out of state. A current listing of these numbers, derived from the 511 Service Attributes v.7 spreadsheet, is shown in Appendix B – 511 Services’ Back-Door Numbers.
- Make note of the back-door number on a 511 website or through response to comments left by callers unable to access the 511 system directly.
- Should comments come from VoIP users, make note of the carrier the caller is using and the problem that they have accessing 511. In a similar manner to call routing difficulties with wireless carriers, tracking and contacting each company directly as the problems arise is another method of mitigating the problem until a long-term solution is achieved.

The Coalition will continue to work on the issue through the Future 511 Technologies and Services Task Force led by Larry Sweeney, Tele Atlas.

## **Appendix A – Sample Listing of VoIP Residential Providers in the US as of December 2005**

Source: <http://www.voip-info.org>

- 1499phone.com
- 1iPhone.com
- 1TouchTone.com
- A2Z Global Call
- ATT CallVantage
- AxVoice
- Belkin CallEverywhere
- CANISTEC
- BinFone
- Broadband Phone Unlimited
- BroadLine
- Broadview Networks
- Broadvoice
- Broadvox
- Callcentric
- Calldaddy
- Call Packet
- CallEveryone
- Cape.Com
- Champion Communications
- Click4netphone
- Closecall
- CoreDial
- CyberiaVoip
- Diamondcard
- Douglas Telecom
- Ecuity

- EGlobalphone
- eStarNetwork
- FVDSL
- Mix Networks
- Enventis Telecom
- EXGN LLC
- FordVoice
- FreePhoNet.
- FreeDigits.com
- Gafachi
- GalaxyVoice
- GlobalTelIP
- GlobeTel MagicPhone
- hablaweb.com
- i2telecom
- Iconnecthere
- Integrated VoIP Solutions
- Intelefone
- INX
- IPN Communications
- Inphonex
- ISPhone
- Kancharla
- Internet Phone Company
- Kphonecard.com
- Lightyear Alliance
- Lingo
- Mach5Voice
- MichTel Communications, LLC
- MCONNECT.
- myPhoneCompany

- NbooM
- Net2Phone
- NetVelocite
- NetZero Voice
- NexBoom
- Nikotel
- Ntegrated Voice
- Nufone
- Our Digital Voice
- Packet8
- Phonom
- PointOne
- QuantumVoice
- R&R Telecom, Inc.
- s3Voip.com
- SIPPhone
- SkyNET Telesystems
- Sound Choice Communications
- SpectraVoice Communications
- SunRocket
- StanaPhone
- SuperNetTel VoIP
- tglo
- TalkDaddy
- TelaSIP
- TeliAx
- TelExtreme
- ThinkBright
- USADatanet
- Verizon VoiceWing
- Vertacom

- ViaTalk
- VOICCOM
- VoipGATE
- VoiceGlo
- VoicePipe
- VoicePulse
- voip.net
- Voip2Save.com
- voipamerican.com
- Voipex
- Vonage
- vonworldwide.com
- VoxFlow
- VoX Communications
- wIPphone
- WiseZard Communications
- WMUnlimited VoIP
- ZingoTel

### 13. Appendix B – 511 Services' Back-Door Numbers

| <u>511 Service</u>               | <u>Phone Number</u> |
|----------------------------------|---------------------|
| Alaska                           | (866) 282-7577      |
| Arizona                          | (888) 411-ROAD      |
| Cincinnati / Northern Kentucky   | (513) 333-3333      |
| Colorado                         | (303) 639-1111      |
| Florida Statewide                | (866) 511-3352      |
| Idaho                            | (888) 432-7623      |
| Iowa                             | (800) 288-1047      |
| Kansas                           | (866) 511-KDOT      |
| Kentucky Statewide               | (866) RDREPORT      |
| Maine                            | (866) 282-7578      |
| Minnesota                        | (800) 542-0220      |
| Montana                          | (800) 226-7623      |
| Nebraska                         | (800) 906-9069      |
| New Hampshire                    | (866) 282-7579      |
| North Carolina                   | (877) 511-INNC      |
| North Dakota                     | (866) MY ND 511     |
| Oregon                           | (503) 588-2941      |
| Orlando                          | (866) 510-1930      |
| Rhode Island                     | (888) 401-4511      |
| Sacramento / Northern California | (877) 511-TRIP      |
| San Francisco Bay Area           | (866) 736-7433      |
| South Dakota                     | (866) MY SD 511     |
| Southeast Florida                | (866) 914-3838      |
| Tampa                            | (800) 576-3886      |
| Utah                             | (866) 511-UTAH      |
| Vermont                          | (800) ICY-ROAD      |
| Virginia                         | (800) 578-4111      |
| Washington State                 | (800) 695-ROAD      |