

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Adcomm Engineering Company's Petition)
for Rulemaking for Amendment of the)
Commission's Rules to Define Effective)
Means for Interworking of Customer)
Premises Equipment and Public Enhanced)
911 (E-911) Systems)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM-8143

REPLY COMMENTS OF THE NYNEX TELEPHONE COMPANIES

New England Telephone and Telegraph Company and New York Telephone Company (the NYNEX Telephone Companies or NTCs) submit these Reply Comments to comments filed January 28, 1993, in the above-captioned matter. Those comments were directed to the above-referenced petition filed October 28, 1992, by Adcomm Engineering Company (Adcomm). Adcomm has requested the FCC to establish a rulemaking proceeding to promulgate specific amendments to the Commission's Part 68 Rules to standardize interconnection of terminal equipment to public emergency access networks (E-911). Adcomm believes that a common approach to handling E-911 calls from private switching systems and the associated Customer Premises Equipment (CPE) location information is necessary to prevent a profusion of incompatible solutions.¹ Adcomm has stated

¹ Adcomm Petition 4.

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that such changes, while not solving the problem, would mitigate it and contain the costs associated with telephone equipment designed to multiple standards.²

As discussed herein, the NYNEX Telephone Companies agree that the area addressed by Adcomm requires continued industry work, but believe that initiating formal FCC action at this time would be premature.

On January 28, 1993, five parties (other than Adcomm itself) filed comments in response to Adcomm's petition.³ All of the commenting parties agreed with Adcomm's position that uniform standards are appropriate to ensure compatibility of CPE and E-911 networks. However, the commentors (other than Adcomm) indicated that there are other relevant issues, of both a technical and nontechnical nature, which Adcomm failed to address but warrant further consideration.⁴

A number of the commentors have also raised concerns regarding the specific additions and changes to the Commission's Part 68 rules as requested by Adcomm, questioning if they would be appropriate and adequate.⁵

² Adcomm Petition 1.

³ Bell Atlantic, BellSouth, GTE, South Carolina Budget and Control Board (South Carolina), Telecommunications Industry Association (TIA).

⁴ E.g., Bell Atlantic 1-2 (compatibility between PBX equipment and 911 systems; numbering matters), BellSouth 2 (network security; customer privacy; efficiency of network architecture), GTE 4-6 (trunk routing options; timing of any changes; grandfathering), So. Carolina 2 (alternative nontechnical solutions).

⁵ Bell Atlantic 1-2, So. Carolina 2, TIA 2-3.

They have indicated there could be inconsistencies which would impose unnecessary financial, technical and administrative hardships on PBX owners, state and local governments, and on telephone companies. The NTCs agree that such issues need to be viewed from different perspectives (i.e., equipment manufacturers and vendors, service providers, network operators and end user customers) in order to assess their potential impact and ensure there is an equitable and cost-efficient balance of such considerations.

The NTCs concur that there is a need for industry guidelines in this area and that any formal rulemaking proceeding would be premature.⁶ Most commentators have pointed out that a rulemaking should be deferred until the appropriate industry forums have an opportunity to develop technical standards and thoroughly investigate all relevant issues and concerns.⁷ The Commission should defer initiating action, such as a rulemaking or inquiry, pending industry investigation of all pertinent issues and the development of uniform national technical requirements.

⁶ See BellSouth 1, 3, TIA 2.

⁷ GTE was the only party to express some support for Adcomm's request for the Commission to initiate a rulemaking proceeding at this time (GTE 1, 6). However, even GTE recognized the FCC should utilize standardization material to be developed by TIA; acknowledged that FCC rules will not necessarily be ultimately required; and noted the existence of many more issues than identified by Adcomm (GTE 1, 3, 6).

Adcomm also proposed a specific rule to mandate that "[t]he telephone company will provide 8-digit numbers for use as ANI for the identified locations."⁸ This proposal raises various issues concerning feasibility and consistency with the North American Numbering Plan (NANP), which issues should be investigated by the industry. Indeed, Adcomm in supplemental comments (p. 1) indicated it has written to the NANP Administrator to enlist its aid in this numbering area.

The Commission has frequently recognized in various arenas (e.g., interconnection, numbering) the importance of industry standards bodies in providing expertise and a forum for the orderly evolution of the network and related Commission rules. We therefore recommend that the Commission give industry groups (including the TIA TR-41 Committee, National Emergency Number Association [NENA], and Exchange Carriers Standards Association [ECSA]) a reasonable period of time to address and reach consensus on relevant issues before addressing the need for a rulemaking on this matter.

In conclusion, for the reasons stated, the NYNEX Telephone Companies oppose Adcomm's petition and recommend that the Commission not initiate a rulemaking proceeding at this time. The Commission should encourage interested parties to participate in industry forums which should continue their ongoing work on the issues bearing upon this

⁸ Adcomm Petition 7.

matter. Once the industry addresses and reaches consensus on such issues, the Commission will be in a better position to determine what, if any, action may be required.

Respectfully submitted,

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and
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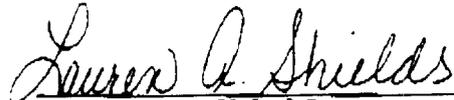
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I hereby certify that a copy of the foregoing REPORT
COMMENTS OF THE NYNEX TELEPHONE COMPANIES in RM-8143, was
served by first class United States mail, postage prepaid, on
each of the parties indicated on the attached service list,
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