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November 17, 1994

Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

RE: CC Docket No. 94-102

Dear Sir or Ma'am:

I am currently reviewing CC Docket No. 94-102 concerning the Notice of Proposed Rule Making on compatibility with enhanced 911 emergency calling systems and I have the following comments:

1. Nowhere in the proposed rulemaking is there a definition of PBX. Telecommunications Systems are changing rapidly in today's market with many capabilities being pushed into personal computers and workstations. In addition, premises switching systems other than PBXs are being marketed and created. It should be made clear whether these systems are affected.
2. The proposed rulemaking explicitly refers to the PSTN and wireless communications systems. There is no reference to PBX's connected to the ISDN. If this is to be included, then the revisions to Part 68 should require that the signaling necessary for Enhanced 911 be carried in the same manner as ISDN signaling.

Thank you for considering these issues. Clarifying these points will assist equipment vendors to determine if the proposed rulemaking applies to their equipment.

Sincerely,

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