

Funding of wireless/E911 compatibility has both state and federal components. Consequently, the Commission and the states should develop a cooperative funding mechanism that recovers the costs of achieving compatibility as equitably as possible. In particular, deployment of technology needed to assure compatibility with E911 services should not be considered a cost of business for wireless service providers. Rather, such technology should be funded the same way that wireline deployment of 911 service has been funded -- through tax revenues, occasionally supplemented with subscriber surcharges. AT&T urges the Commission to initiate a further proceeding, with full opportunity for state involvement, in order to assure that funding issues are addressed comprehensively, consistently, and fairly.

III. CONCLUSION

AT&T shares in the spirit and objectives of the Notice, but believes that the specific approach proposed by the Commission can be significantly improved. With respect to MLTS/911 compatibility, the Commission should establish a new rule Part that includes precise definitions and rationally apportions responsibility for compliance among manufacturers, MLTS operators, LECs, and PSAPs. With respect to wireless/911 compatibility, the Commission should forego adopting mandatory compatibility criteria and deadlines, and instead should encourage continuation of industry processes that have made substantial progress toward identifying key requirements and

expediting development of performance standards. These recommendations, as detailed above, will allow manufacturers, carriers, and emergency response providers to implement consensus solutions that promote compatibility in the most rapid, efficient, and cost-effective manner possible.

Respectfully submitted,

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