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

In the Matter of)
)
Revision of the Commission's Rules) CC Docket No. 94-102
to Ensure Compatibility with) RM-8143
Enhanced 911 Emergency Calling Systems)

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REPLY COMMENTS OF
FUJITSU BUSINESS COMMUNICATION SYSTEMS, INC.

Fujitsu Business Communication Systems, Inc. ("FBCS"), on its behalf, hereby submits its reply comments in response to the above captioned Notice of Proposed Rule Making. FBCS is a manufacturer of telecommunications systems and equipment including PBX equipment.

FBCS generally supports making PBX and similar equipment as compatible with enhanced 911 ("E911") systems as is technically and economically feasible. However, its primary concern was raised by Telident, Inc., in its reply. Telident, Inc.'s reply states, in pertinent part, "that for business and regulatory common sense reasons, it would be *inappropriate* for the Commission to dictate that any electronic solution to this problem must be 'internal' to the MLTS system." (Emphasis added.) FBCS agrees that the regulations in this respect should be outcome determinative irrespective of the mechanism implemented by the manufacturer to achieve the goals set forth in the proposed rule. The FCC's clarification of this point is necessary and should be reflected in the final rule.

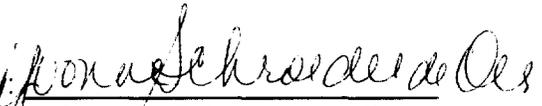
Additionally, the FCC should clearly define the parameters of proposed section 68.320(d) which states, in pertinent part: "Additional trunks shall be added to maintain an availability of P-0.01 based on the number of users served." Parameters based on

a service level of P-0.01 need clarification because such parameters are affected by other factors such as hold times, peak hour usage, etc. which affect blocking probabilities. This issue is critical to the implementation of standards that truly regard public safety concerns -- clarification of this technical issue answers the question: How many 911 calls can be processed simultaneously?

FBCS shares in the spirit and objectives of the Notice for Proposed Rule Making with respect to PBX equipment standards. Many of FBCS' concerns already have been raised by other telecommunication equipment manufacturers and suppliers in their replies to the Notice. Nevertheless, clarification of the issues set forth above will allow manufacturers to promote enhanced 911 compatibility.

Respectfully submitted,

Fujitsu Business Communication
Systems, Inc.

By: 
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Corporate Counsel

February 7, 1995

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