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BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

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MAR 17 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Revision of the Commission's Rules to Ensure)
Compatibility with Enhanced 911 Emergency)
Calling Systems)

CC Docket No. 94-102
RM-8143

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**COMMENTS OF SIEMENS
ROLM COMMUNICATIONS INC.**



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March 17, 1995

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Reply Comments of Siemens Rolm Communications Inc.

on the

Notice of Proposed Rule Making, FCC 94-237

Siemens Rolm Communications Inc. ("Siemens Rolm") submits its reply comments on the above matter now before the Federal Communications Commission ("FCC"). As a major U.S. manufacturer of private branch exchange ("PBX") systems, Siemens Rolm believes it can assist the FCC by replying to comments on the FCC's proposed rules contained in "Revision of the Commissions Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems," CC Docket No. 94-102, Notice of Proposed Rule Making, 9 FCC Rcd. 6170 (1994) ("NPRM").

Introduction

Siemens Rolm is an industry leader in the development of large private network systems. We are therefore aware of the issues faced by large corporate users of new telecommunications technology in a continually evolving regulatory environment. Access to Enhanced 911 service is greatly affected by these issues.

Two sets of comments filed by other corporations on this matter propose that the scope of inquiry be broadened. We support those proposals.

The Commission should open an inquiry into the implications of new high-capacity connections on Enhanced 911 access

According to Redcom Laboratories, Inc., "As ATM and other packet transmission protocols, and media such as direct connect fiber, SONET, and other high-capacity media are deployed, the cost to break-out a specific 911 interface such as a '4-wire E/M' circuit for specific PBX is too costly." We agree that more cost-effective approaches to providing Enhanced 911 access will be required as such high-capacity connections are deployed. We propose that the Commission open an inquiry into the future of Enhanced 911 access architectures.

This inquiry should acknowledge the newly competitive environment of the local loop

Redcom Laboratories has also pointed out that competition in the local loop changes the nature of access to 911 service, and makes customer information highly proprietary: "Some means of 'third party administration' is probably going to be required to keep confidential and separate competing companies databases of customers and their locations. The local telephone

company of today must be phased out of this database management role.” As stated by Cable Plus, “In these changing times, where the use of wired and wireless services is escalating, and the definition of dial-tone provider is being molded by new regulatory and telecommunications laws, it is highly apparent that the current closed 9-1-1 system architecture between the LEC and the Public Safety Answering Point (PSAP) is no longer adequate.” The existence of multiple local access providers will complicate the architecture of Enhanced 911 access and the corresponding relationships and responsibilities of MLTS operators, local access providers, and PSAPs. These matters should be opened up for public inquiry.

Future networks will require access to Enhanced 911 from a distance

When considering the future of Enhanced 911, it is vital that consideration of the future of Enhanced 911 include the implications of the National Information Infrastructure, including private broadband enterprise backbones. The NII is certain to support and encourage organizations and networks which span the nation. As that occurs, jurisdiction for 911 response could create a patchwork of expensive and inefficient work-arounds for gateways between the NII and today's public switched network to properly route emergency calls for the remote locations of far-flung network. If an inquiry is to address the needs of the immediate future as well as the past, it must also address the question of a nationwide backbone for Enhanced 911. Simply requiring each PSAP to have a North American Numbering Plan (NANP) number, which could be dialed from a distance, could streamline administrative, operational, and cost issues.

Conclusion

Siemens Rolm concurs in broadening the scope of inquiry for Enhanced 911 to encompass the future needs of such a system in addition to current needs.

Respectfully submitted,



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