

The comments raised by these parties reinforce GTE's concerns with regards to stage two and suggest that the Commission consider eliminating stage two entirely. In particular, the Commission should consider whether keeping stage two will help or hinder development towards the provision of more advanced location information.

c. Stage Three

In its comments, GTE noted that leading experts on wireless service, technology, and capabilities -- the "Joint Experts" -- had concluded in their most recent report that the technologies necessary to deliver wireless location information required additional development and testing, and that adopting even minimum requirements at this time may be premature.⁵⁹ With the exception of emergency service providers, and entities working to develop location information technology, parties overwhelmingly agree that the technology necessary to enable wireless carriers to provide stage three has not been developed enough to justify adoption of the stage three requirement.

For example, Motorola, one of leading developers of wireless equipment, commented, with respect to stage three, that "the provision of accurate location determination for wireless subscribers will require invention which has not yet been accomplished."⁶⁰ Motorola also stated that there is no evidence to suggest that any of the developers of technologies studied and surveyed in the C.J.

⁵⁹ GTE Comments at 22, *quoting*, the Emergency Services Joint Experts, November 2, 1994 report.

⁶⁰ Motorola Comments at 14.

Driscoll and Associates study -- a primary basis for the Commission's stage three proposal -- have carried out a feasibility study to determine if the technologies would be suitable overlays on wireless systems.⁶¹ Motorola endorsed an AT&T study which concluded that more work is needed to determine if commercial direction finding equipment works as claimed.⁶² Another equipment manufacturer, Ericsson, suggested that the stage three proposal is riddled with many technical and practical problems.⁶³

Wireless service providers, likewise, unanimously opposed adoption of the stage three requirement at this time. While these parties generally agree that the industry should work towards implementation of advanced location information capabilities, they conclude that the technologies surveyed in the Driscoll Report have serious shortcomings in different environments, are enormously expensive, and are still being developed.⁶⁴

In light of these comments, there is no basis for adopting the stage three proposal at this time. In lieu of adopting stage three, the Commission should consider the other proposals raised by parties for advancing the development and implementation of location identification capabilities.

⁶¹ *Id.* at 15.

⁶² *Id.*, citing, AT&T, "Radio Direction Finding of Mobile/Portable Wireless Devices," March 21, 1994, submission to PCIA's Emergency Access Task Force, Document Number TE/94-4-15/519.

⁶³ Ericsson Comments at 9. See also Northern Telecom Comments at 46-48.

⁶⁴ ALLTEL Comments at 3; Ameritech Comments at 8; AT&T Comments at 32-36; Bell Atlantic Comments at 9-11; BellSouth Comments at 15; NYNEX Comments at 13-14; Pacific Telesis Comments at 5-6; PCIA Comments at 15; SBC Comments at 17-19; U S West Comments at 14-20.

d. Other Proposals

GTE proposed in its comments that, rather than adopt a stage three requirement, the Commission should require wireless carriers to work with vendors towards development of a location system that will provide more accurate location information.⁶⁵ A number of other parties suggested alternative proposals.

A particularly interesting proposal was suggested by U S West. It proposed an approach whereby within four years of an order in this proceeding, a public safety organization could submit a *bone fide* request for an enhanced wireless 911 capability.⁶⁶ Carriers in the jurisdiction of the public safety organization would then negotiate the services to be offered, technical solutions necessary to provide those services, and a deployment schedule for the services. Under the plan, carriers would receive assurances prior to modifying their networks to support enhanced 911 that: (1) the local PSAP is capable of using the service; (2) appropriate funding is available; (3) other public safety organizations in the area do not oppose the plan; (4) carriers will be protected against liability for negligence or unintentional errors; and (5) there will be an opportunity for the carrier to show the service is not technically feasible.⁶⁷

⁶⁵ GTE Comments at 23-24.

⁶⁶ U S West arrived at the four year time period for *bone fide* requests based on its assessment that the industry would need 24 months to develop interface and signaling standards for enhanced 911 services. Once the standards are set, an additional 24 months would be needed to allow vendors to build or modify equipment in accordance with such standards. U S West Comments at 21.

⁶⁷ U S West Comments at 20-26. CTIA also endorses a *bone fide* request for service approach. CTIA Comments at 18-20.

PCIA suggested a four-step approach to developing advanced location technologies, consisting of: (1) development of a standards requirement document; (2) establishment of a joint emergency services coordinating body to develop standards; (3) manufacturing and field testing of prototype systems; and (4) implementation. PCIA estimates that this process would take approximately seven years for wide-scale deployment.⁶⁸

Other location information development plans proposed include Motorola's "Location Subsystem Interface," under which wireless carriers would have the alternative of providing 911 location capability either by integration into their current infrastructure or by an overlay subsystem provided by a third party equipment provider.⁶⁹ Northern Telecom advocated a negotiated rulemaking among trade associations, standard committees and public safety organization representatives as a means of resolving outstanding wireless issues.⁷⁰

GTE continues to support a cooperative effort among industry, equipment manufacturers, developers of new technologies, and emergency services personnel towards development of a reasonable, cost effective location information capability. Several of the alternative frameworks suggested by commenters could serve as the basis for such a cooperative effort.⁷¹ GTE

⁶⁸ PCIA Comments at 15-20.

⁶⁹ Motorola Comments at 16-17.

⁷⁰ Northern Telecom Comments at 53-54.

⁷¹ GTE has some concerns, however, that the U S West proposal could lead to a fragmented system that differs from region to region.

recommends that the Commission focus in this proceeding on adopting wireless enhanced 911 compatibility standards that can be implemented in the near term. The Commission should, in a future proceeding, propose a plan for developing more advanced long-term capabilities. Some of the proposals set forth in this proceeding should be considered at that time.

5. The Commission Should Leave Common Channel Signaling Implementation Issues to the Industry

In its comments, GTE asked the Commission, rather than adopting a common channel signaling implementation schedule, to allow industry standards groups to continue to address implementation issues.⁷² Parties addressing this issue in their comments, generally concurred with GTE's position.

PCIA, for example, noted that common channel signaling is a feature that will require cooperation by wireless carriers, LECs, and PSAPs to implement. Based on the need for coordination, PCIA asked the Commission to allow these parties to work towards the joint implementation of a universal common channel signaling or interworking platform.⁷³ AT&T questioned whether implementation could be completed in the three year time frame.⁷⁴ AT&T and PCIA also asked the Commission to allow the wireless industry and 911 community to agree on the scope of information that ultimately will be provided.⁷⁵

⁷² GTE Comments at 26-27. GTE also asked the Commission not to specify a particular common channel signaling method that must be deployed by wireless networks. *Id.*

⁷³ PCIA Comments at 21-23. *See also* Pacific Telesis Comments at 7-8; SBC Comments at 21-23.

⁷⁴ AT&T Comments at 37.

⁷⁵ AT&T Comments at 37-38; PCIA Comments at 23.

The comments filed in this proceeding do not justify adopting a common channel signaling requirement. The Commission should, as GTE and others have suggested, continue to allow the industry to work to resolve common channel signaling implementation issues.

II. OTHER ISSUES

Concerns Regarding Local Exchange Competition Should Not Be Used in an Attempt to Justify Major and Costly Design Changes in the Current 911 Systems

In its comments in this proceeding, MCI states that "[t]he Commission has not sought comment specifically on the implications of the proposals outlined in this docket for the emerging competitive local exchange industry."⁷⁶ While GTE believes that this area must be examined in order to ensure that the public's safety is not compromised, GTE does not believe that there is any need to issue a further notice, as proposed by MCI.⁷⁷ As the NPRM in this proceeding states,

The primary objective of this proceeding is to ensure broad availability of 911 and enhanced 911 services to users of the public switched telephone network (PSTN) whose health and safety may depend on 911 emergency services systems. Toward this end, we intend to ensure that the effective operation of 911 services is not compromised by new developments in telecommunications.⁷⁸

MCI's concerns have little to do with public safety. Rather, their focus is centered around a fear that certain existing arrangements may allow an

⁷⁶ MCI Comments at 2.

⁷⁷ *Id.* at 4.

⁷⁸ NPRM at 2.

incumbent to "exploit its role as custodian of the ALI database in an anticompetitive fashion."⁷⁹ GTE believes that these fears are unfounded and should not be used in an attempt to justify major and costly design changes in the current 911 systems.

In those cases where GTE maintains the ALI data base,⁸⁰ GTE does not charge other service providers for accepting and processing input to the ALI data base. Tariff charges are billed to the county or agency purchasing the service for such costs. Should another carrier incur costs in creating this information, standard practice would be for that carrier to recover its costs from the 911 customer. If there are legitimate concerns about competitors being charged discriminatory rates to submit ALI data base information, a specific complaint proceeding would be more appropriate than to delay this proceeding with another notice.

In addressing 911 services and competition in the local exchange, the Commission need only require that current 911 systems not be disrupted by new competitors entering the marketplace. Competitive entry into the local exchange is currently taking place -- as evidenced by MCI Metro, MFS, Teleport and others -- and will likely continue as technologies reduce the cost necessary to enter the market. Existing 911 services should not be disrupted or revised each

⁷⁹ MCI Comments at 3.

⁸⁰ Because data in the ALI contains information that is not found in the public directory listings (e.g., non-published, unlisted, etc.), this information is carefully protected and cannot be used by marketing groups within GTE.

time a new competitor enters the market with an internal operating system that differs from the current system used to support the 911 system. System changes are always costly and governmental agencies generally will not have the funds necessary to pay for major upgrades in software and equipment every time a new local exchange market entrant wishes to use a new, non-standard method of connecting to the service. This is not to say that current 911 systems and standards are or should be frozen, only that 911 services should not be caught up in the battle for local exchange market share.

CONCLUSION

GTE believes that the majority of comments filed in this proceeding support a measured approach toward adopting wireless enhanced 911 compatibility standards. Toward that end, GTE urges the Commission to develop a realistic set of enhanced 911 features in particular for wireless carriers. The Commission should adopt in this proceeding, only those compatibility standards that can be supported by technology that is designed, tested and ready to implement in the short-term. The Commission must also consider -- in appropriate proceedings -- cost issues associated with implementation of enhanced 911 features, and PSAP upgrades necessary to allow the emergency services community to take full advantage of the enhanced features that are implemented.

The Commission should not adopt at this time compatibility standards for enhanced 911 features that depend upon technologies not yet fully developed or

tested. Rather, the Commission should foster cooperative efforts among the industry, equipment manufacturers, software developers, and emergency services community to develop such capabilities. Implementation deadlines should only be adopted when enhanced features become technologically feasible and cost-effective.

Finally, concerns regarding local exchange competition should not be used in any attempt to justify major and costly design changes in the current 911 systems.

Respectfully submitted,

GTE Service Corporation and its telephone
and wireless companies

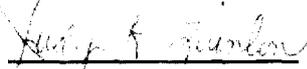
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Certificate of Service

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Reply Comments of GTE" have been mailed by first class United States mail, postage prepaid, on the 17th day of March, 1995 to all parties of record.


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