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Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Re: CC Docket 94-102, E9-1-1 compatibility with multiline  
and wireless telephone systems

Dear Mr. Secretary:

This letter is submitted on behalf of the National Emergency Number Association (NENA), for placement on the record of the referenced proceeding, pursuant to Section 1.1206 of the Commission's rules. It is prompted by a report appearing in *Communications Daily* of May 16, 1995, "Cellular Industry Considers Separate Highway and Nonhighway Calls." A copy is attached for convenience.

According to the report, the California Highway Patrol (CHP) and the Cellular Telecommunications Industry Association (CTIA) are considering ways in which to separate highway emergency calls falling into CHP jurisdiction from other types of emergencies requiring the CHP to refer the call. The CHP spokesman explained that all cellular 9-1-1 calls in California are routed to the CHP, that these totalled 2 million in 1994, but that some 600,000 of last year's calls were "unrelated to highway problems." The report also quoted the CHP spokesman on the "Mulligan stew" of disparate dialing codes used to reach highway patrol or state police offices around the country.

The difficulties described are not confined to California but are nationwide. They are under the FCC's direct scrutiny in CC Docket 94-102, and illustrate perfectly why wireless telephone systems must operate compatibly with the enhanced 9-1-1 (E9-1-1) networks now operated by wireline telephone companies and Public Safety Answering Points (PSAPs). The answer, as NENA and other public safety commenters have pointed out, lies in improved processing of single-number dialing, not in the creation of new and confusing dialing codes.

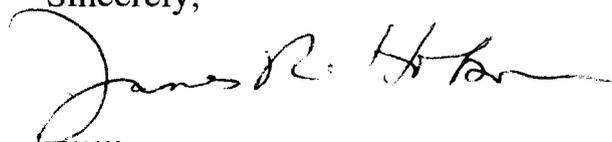


Once a wireless call is able to convey automatically the callback number of the originating unit and the location of the caller, in standard formats that can be processed quickly by wire networks and PSAPs, "selective routing" can occur so that not all requests end up with the CHP or any other single agency.

The best way to "streamline information provided by callers" is to have the basics of the caller's telephone identity and location and nearest source of help delivered automatically to responding safety agencies. The best way to achieve more national uniformity in access to emergency networks is to make 9-1-1 work better, not stir up the Mulligan stew with yet more dialing codes to separate calls.

NENA is quite aware of and sympathetic to the need for transitional solutions to the floods of calls occasionally overwhelming beleaguered offices such as the CHP.<sup>1</sup> But we should not fail to recognize them as merely second-best and temporary. The sooner the Commission's proposals are adopted for phased introduction of automatic number identification, location information, and other E9-1-1 features to wireless calling -- steps which will require modifications not only by radio providers but in wireline networks and PSAPs as well -- the shorter will be this frustrating time of transition.

Sincerely,



William E. Stanton  
Executive Director

James R. Hobson  
Counsel

cc: Reed E. Hundt, Chairman, FCC  
John Logan, Deputy Director, FCC Office of Legislative Affairs  
Alan Thomas, FCC Common Carrier Bureau

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<sup>1</sup> See e.g., J.A. Jones, Jr., "Cellular Telephones and Emergency Service," *NENA News*, February 1994, placed on the record of the predecessor rulemaking, GEN Docket 90-314, by transmittal letter of February 24, 1994.

At AEI seminar, panel of economists criticized Bliley bill for not being sufficiently deregulatory and for not dealing with spectrum reform. Attorney Peter Huber said DoJ waiver process had broken down and should be eliminated. Huber, whose firm represents RHCs, said his office uses MFS for long distance and internal calling so that "we never need Bell Atlantic." Others on panel criticized bill as not being sufficiently deregulatory, but most said they would vote for it because it could lead to greater reforms. Also on panel were George Washington U. Prof. Gerald Brock, ex-FCC Common Carrier Bureau Chief; Brookings Institution economist Robert Crandall; Thomas Hazlett of U. of Cal.-Davis; Harold Furchtgott-Roth, chief economist for House Commerce Committee. Moderator was AEI Fellow Gregory Sidak, only one of non-Hill economists who said he would vote against Bliley bill.

### Growth Floods Cal. System

#### **CELLULAR INDUSTRY CONSIDERS SEPARATE HIGHWAY AND NONHIGHWAY CALLS**

CTIA agreed Mon. to consider Cal. proposal for separate highway emergency number to control flood of 911 traffic unrelated to highway problems and public education effort to streamline information provided by callers. CTIA Pres. Thomas Wheeler met with Cal. Highway Patrol (CHP) Comr. Maurice Hannigan, whose department handled 2 million 911 calls last year, 30% (600,000) unrelated to highway problems that required referral. "It makes a lot of sense," Wheeler told us. "This is the kind of thing the industry needs to be responsive to." He said 18,000 people daily call 911 from cellular phones, reporting emergencies or seeking assistance. FCC also is considering issue, but Chmn. Hundt didn't have immediate comment on proposal.

Cal. and other states route 911 calls from cellular network to single agency, such as CHP. Since 1985, CHP has handled all 911 calls in state, starting with 29,000 first year and expanding to 2 million last year, Hannigan said. Callers should be able to dial same number nationwide, such as \*SP for state patrol, to report accidents or request assistance, he said. "Right now, there's a Mulligan stew of different types of approaches to get into the emergency system." Nonhighway calls must be sent to another agency, delaying response time, he said. Hundt referred matter to John Logan, deputy dir., FCC Office of Legislative Affairs.

Hannigan said he has raised issue repeatedly in law enforcement community, including International Assn. of Chiefs of Police, with little success, as each agency protects its territory and responsibilities. In Fla., it's \*FHP; in Nev., it's \*NEV; in other states, \*77 or #77, he said. In Chicago, 911 call originating from cellular phone in downtown Loop is delivered to Ill. Toll Road police agency, Wheeler said. Hannigan said problems increased with explosion of portable and handheld phones, which are used while walking, picnicking or witnessing crime.

Police also sought public education campaign to standardize and streamline process used when motorists call 911 to report troubles, such as disabled auto, accident or other emergency. Hannigan said that in L.A. and San Francisco, it's not unusual to get 40 to 50 calls about same incident, although each call presents information differently. With standard information, dispatchers can inform callers quickly that agency has information and "we don't have to miss another vital emergency call," Hannigan said.

Comments came as CTIA honored 7 individuals, including Rep. Sensenbrenner (R-Wis.), who called fire department after seeing smoke from house fire on Jan. tour of his district, and Joey Durrance, 5, who called police in Feb. when his mother collapsed while shopping near Daytona Beach, Fla. Each received plaque and free trip to D.C. to mark Cellular Safety Week. Other honorees included Va. woman trapped in March 1994 snowstorm while driving daughter "in severe labor" to Fairfax (Va.) Hospital, D.C. couple who twice have called police to report suspicious activities in neighborhood, Ga. trucker who summoned ambulance for couple whose car broke down en route to Atlanta hospital, Colo. pilot who used cellular phone to reach airport in Feb. when private plane's landing gear became stuck and communications failed and Cal. couple who called police after they saw accident in which Sacramento Kings basketball player Bobby Hurley broke his neck.

### Sauter Comments

#### **PARTNERSHIP WITH STRONG COMMERCIAL ALLY COULD SAVE PTV**

DANA POINT, Cal. -- Possible solution to public broadcasting system's plight could be partnership with "huge" telecommunications partner that would provide financial backing in return for access to much-coveted PBS audience, whose whole-number ratings are envy of some competitors that are seeing fractional ratings as number of channels increases. So said Van Gordon Sauter, former pres. of CBS News and CBS Sports and executive at Fox News, who recently left commercial arena to become pres.-gen. mgr. of KVIE Sacramento-Stockton. He was speaking at May 3 luncheon at Pacific Mountain Network conference here.