

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

CC Docket No. 94-102

RM-8143

DOCKET FILE COPY ORIGINAL

To: The Commission

COMMENTS OF VANGUARD CELLULAR SYSTEMS, INC.

Vanguard Cellular Systems, Inc. ("Vanguard"), by its attorneys, hereby submits its comments in response to the Commission's Public Notice in the above-referenced proceeding.^{1/} Vanguard continues to support the Commission's objective of ensuring broad availability of 911 and enhanced 911 services to users of wired and wireless telephone networks. The Consensus Agreement described in the Public Notice is a substantial step toward achieving that objective. Vanguard concurs in the underlying objectives of the Consensus Agreement, but, as shown below, some refinements should be made, particularly to the time table for implementation, before the Commission adopts final rules.

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^{1/} Public Notice, "Commission Seeks Additional Comment in Wireless Enhanced 911 Rulemaking Proceeding Concerning 'Consensus Agreement' Between Wireless Industry Representatives and Public Safety Groups," DA 96-198, rel. Feb. 16, 1996 (the "Public Notice"). The Public Notice requests additional comments in the Commission's pending wireless 911 rulemaking. See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Notice of Proposed Rulemaking*, CC Docket No. 94-102, rel. October 19, 1994 (the "NPRM").

I. INTRODUCTION

Vanguard is a long term provider of cellular service and is one of the major carriers operating today. Vanguard entered the cellular marketplace in 1984 and now is one of the 20 largest cellular carriers in the country. Vanguard's cellular systems serve 26 markets in the eastern half of the United States; cover a geographic area containing more than 7.5 million people; and have approximately 400,000 subscribers. Taken together, Vanguard cellular networks today deploy approximately 300 cell sites. Consequently, Vanguard and its customers have a direct interest in the outcome of this proceeding. For that reason, Vanguard participated actively in the comment period following the issuance of the *NPRM*, filing comments and reply comments.

Vanguard's position, then and now, is that implementation of advanced 911 capabilities is important and should be achieved as soon as reasonably possible. Vanguard has demonstrated its own commitment to emergency services by permitting any caller with an activated cellular telephone in Vanguard territory to reach emergency services by dialing 911.^{2/} Any Commission rules must recognize, however, that implementation of advanced wireless 911 services cannot be achieved overnight. Indeed, the nation still is far from achieving ubiquitous landline 911 access, after well over two decades of effort.

The Public Notice seeks comment on a Consensus Agreement reached between the Cellular Telecommunications Industry Association and representatives of the public safety community. The Consensus Agreement modifies the proposals in the *NPRM* by eliminating

^{2/} Vanguard transmits 911 calls even when it has terminated a customer for non-payment or when a roaming customer's underlying carrier is delinquent in its account. See Vanguard Initial Comments at 10. (All comments and reply comments filed in response to the *NPRM* will be referred to in this filing as "Initial Comments" and "Initial Reply Comments," respectively.)

some requirements and simplifying the implementation path. In addition, the Consensus Agreement requests Commission assurance that wireless providers will have access to existing 911 funding mechanisms and that providing advanced 911 information will not violate federal privacy requirements.

The Consensus Agreement represents a significant step forward in this proceeding. Nevertheless, certain modifications should be made. First, funding from 911 support mechanisms should be available for any costs of compliance with the Commission's 911 requirements, just as wired carriers are reimbursed for their 911 expenses. Second, the Commission should recognize that the implementation time frames suggested in the Consensus Agreement may be unrealistic, especially in a changing technological environment.

II. The Basic Principles of the Consensus Agreement Are Sound.

The Consensus Agreement reflects a serious effort by affected parties to find common ground on implementation of advanced 911 services. That common ground is reflected in a series of basic principles that the Commission should adopt as a result of this proceeding.

First, the Consensus Agreement adopts a phased approach to implementation of advanced 911 services. As Vanguard demonstrated in its Initial Comments and Initial Reply Comments in this proceeding, phased implementation is a realistic approach that will accomplish all of the objectives of this proceeding over a reasonable period of time. *See* Vanguard Initial Comments at 12; Vanguard Initial Reply Comments at 3. A phased approach permits more immediate deployment of readily-available technologies, thereby bringing the benefits of certain advanced features to consumers immediately. At the same time, staged implementation will allow additional time for development of the technologies

needed to permit more accurate location of wireless callers and also will allow wireless providers to spread the costs of deployment over time.

A Commission mandate for uniform deployment of advanced 911 technologies is an important element of the phased implementation plan. Otherwise many wireless carriers may be forced to implement a hodgepodge of inconsistent technologies across their service areas. This already is a problem for carriers with service areas in several states, including Vanguard. For instance, Vanguard's Huntington MSA system provides service in Kentucky, Ohio and West Virginia and Vanguard now faces the prospect of different sets of 911 requirements for each state. Implementing multiple 911 technologies within a single wireless system not only would be expensive, but also is likely to be technically difficult, especially if the technologies were not designed to be mutually compatible. In fact, public safety could be adversely affected by the implementation of mutually incompatible 911 technologies. Thus, uniform Commission requirements for implementation of advanced 911 service, through a phased approach like that proposed in the Consensus Agreement, are vital.

Second, the Consensus Agreement adopts realistic operational goals for the wireless environment. It recognizes the practical limitations on location technologies and acknowledges that there are some areas where implementation may be difficult. Again, this is a principle that Vanguard recommended to the Commission in the initial phase of this proceeding. *See* Vanguard Initial Comments at 19-20, 22.

Third, access to existing funding sources for advanced 911 services will speed implementation of the capabilities described in the Consensus Agreement. Guaranteed funding for enhanced 911 has been one of the key factors in the growth of those services for wired telephony customers. It is likely that applying the same principle to wireless services

will have the same result. Moreover, extending current funding mechanisms to wireless carriers is consistent with the philosophy that led to adoption of those mechanisms in the first place.^{3/} Indeed, given the significant growth in wireless use of 911 services, it may be appropriate for state funding mechanisms to focus their attention on wireless, rather than wired, services.

Finally, the Commission should accept the request of the parties to the Consensus Agreement and clarify wireless carriers' privacy obligations under current federal law. Vanguard agrees that Section 103(a)(2)(B) of the Communications Assistance for Law Enforcement Act, codified at 18 U.S.C. § 1000 *et seq.*, is not intended to prevent the provision of location information in connection with 911 or other emergency calls. By its terms, the prohibition on providing location information is limited to "information acquired solely pursuant to the authority for pen registers and trap and trace devices[.]" 18 U.S.C. § 1002(a)(2)(B). Because this limitation applies only in the specific situations described in the statute, *i.e.*, to pen registers and trap and trace devices, it does not apply in other circumstances, including 911 calls.^{4/} The Commission should confirm that this interpretation is correct and that provision of location information in the context of emergency calls is permissible.

^{3/} Today, some states impose their 911 tax on wireless customers even though the state does not provide funding to wireless 911. In effect, wireless customers are taxed twice — once for their wired phones and once for their wireless phones — but only their wired phone service is eligible for payments to offset 911 costs. This taxation of wireless customers without a corresponding benefit is unfair.

^{4/} The terms "pen register" and "trap and trace device" are defined elsewhere in Title 18. Both are intended to apply to situations when a device is used solely for the purpose of recording information about calls made or received, respectively, on a specific line. 18 U.S.C. § 3127(3), (4).

III. The Commission Should Modify Certain Elements of the Consensus Agreement.

While, as described above, the basic principles adopted in the Consensus Agreement are sound, there are certain elements of the agreement that should be modified before the Commission adopts an order in this proceeding. Principally, the Commission should find that funding should be available for all activities undertaken to comply with 911 requirements and the Commission should recognize that the proposed implementation time lines may be unrealistic.

It is significant that the Consensus Agreement supports funding compliance with 911 requirements through existing funding mechanisms. *See supra* Part II. The Consensus Agreement does not go far enough, however, because it would limit the availability of funding to Phase II capabilities. That approach is not consistent with funding for wired telephone access to 911 services and is not consistent with the public interest. Rather, the Commission should find that funding should be available for any activities, whether in Phase I or Phase II, that are necessary to comply with its 911 requirements.

For instance, and as Vanguard described in its initial comments, even compliance with the proposed Phase I requirements may require substantial changes because of existing limitations on signaling information. Vanguard Initial Comments at 23-24. The provision of both pseudo-ANI (for call location) and caller ANI (to identify the calling party) — involving a total of 14 to 20 digits — simply is not supported in typical networks today. Moreover, the necessary changes may have to be made not only in the wireless network, but in the local exchange carrier network or at the Public Safety Answering Point. There is no reason to require wireless carriers to bear the costs of such an upgrade, especially because public safety authorities and LECs will have access to 911 funding to pay their costs for the same

upgrade. If nothing else, denying wireless carriers access to these funds would be extremely unfair.

The same principles apply to any changes or upgrades that are necessary to comply with the Commission's 911 rules for wireless carriers. There is simply no reason to distinguish between costs associated with Phase I and Phase II and the Commission should not do so. Rather, it should find that funding should be available to wireless carriers for any changes or upgrades required to provide enhanced 911 services.

The issue of the timetable for compliance is, in many ways, related to funding questions. While five years may seem sufficient for compliance with the proposed Phase II obligations, there may be considerable difficulties in meeting that deadline. In the first phase of this proceeding, for instance, Vanguard's principal equipment supplier identified a series of complex tasks that would have to be completed before the Commission's objectives could be achieved. These tasks simply could not have been completed in the five year time frame proposed in the *NPRM*. See Northern Telecom Initial Comments at 45-51; see also Vanguard Initial Reply Comments at 9-11. The Consensus Agreement eliminates some of the more problematic technical issues raised by the *NPRM*, such as the proposed requirement for three-dimensional location information, but nevertheless significant concerns remain. Consequently, the time frames described in the Public Notice should be viewed as minimums, not as hard and fast deadlines. The Commission also should bear in mind the experience in implementation of 911 service by local exchange carriers, a task that now is well into its third decade and has not yet been completed. By comparison to the

implementation of wired 911, the proposed deadlines for wireless compliance are quite short.^{5/}

The Commission may be able to ameliorate some of these concerns by tying implementation requirements to the availability of funding for wireless 911 activities. This would allow states and communities to set their own priorities for wireless 911. Some areas may deem advanced wireless 911 capabilities sufficiently important to fund them before the technologies are mature, when implementation is difficult and costs are high. Others may choose to limit deployment of advanced technologies until implementation is relatively easy and costs are lower. In any event, no wireless carrier should be required to implement advanced 911 capabilities until funding is available from state or municipal sources. Otherwise wireless carriers may be placed in the untenable position of having to implement 911 technologies that are not really ready to be deployed, without the prospect of reimbursement, in communities that are not yet equipped to use them.

IV. Conclusion

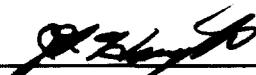
The Consensus Agreement is a significant step forward in this proceeding, and the Commission should adopt the basic principles it contains. At the same time, the Commission also should modify some of the terms of the Consensus Agreement to ensure that wireless carriers are not unfairly burdened by compliance with enhanced 911 requirements. Thus, and for all the reasons described above, Vanguard Cellular Systems, Inc. urges the Commission to adopt rules in this proceeding that will advance the public interest in the

^{5/} These are among the many reasons that, at a minimum, the Commission should adopt the 18-month implementation period for Phase I 911 services, rather than the 12-month period proposed by the public safety organizations.

availability of advanced wireless 911 services without unreasonably burdening wireless carriers who provide those services.

Respectfully submitted,

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By:  _____

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CERTIFICATE OF SERVICE

I, Tammi A. Foxwell, a secretary at the law firm of Dow, Lohnes & Albertson, do hereby certify that on this 4th day of March, 1996, I caused copies of the foregoing "Comments of Vanguard Cellular Systems, Inc." to be served, by first-class mail except where indicated as hand delivery, to the following:

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*Via hand delivery.