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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Amendment of Part 22 of the Commission's	)	
Rules to enable a cellular telephone user	)	CC Docket No.
effective and reliable access to 911 service	)	94-102

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REPLY COMMENTS OF THE
AD HOC ALLIANCE FOR PUBLIC ACCESS TO 911
CONCERNING THE "CONSENSUS AGREEMENT"

The Ad Hoc Alliance for Public Access to 911 ("Alliance")[1], by under signed counsel, hereby replies to the comments submitted[2] in response to the Commission's request for additional comments concerning the "Consensus Agreement".[3] In its comments, the

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[1] The members of the Alliance are: Alliance for Technology Access, Arizona Consumer League, National Consumers League, World Institute on Disability, National Emergency Number Association - California Chapter, Crime Victims United, Justice for Murder Victims, California Cellular Phone Owners Association, Florida Consumer Fraud Watch, Center for Public Interest Law, Consumer Action, Consumer Coalition of California, Consumers First, California Alliance for Consumer Protection, Californians Against Regulatory Excess, The Office of Communication of the United Church of Christ, Utility Consumer Action Network, Children's Advocacy Institute and Honorable Donald Vial (past president of the California Public Utilities Commission).

[2] Comments were submitted by 5 cellular carriers, 2 cellular trade associations, 1 private carrier trade association, 2 law firms representing private and commercial system operators, 3 manufacturers, one consumer group, the Alliance, and several other interested persons.

[3] The word "consensus" is a presumptuous misnomer. See comments from: Rural Cellular Association, p. 1 ("Contrary to the implication of its name, this

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Alliance urged the Commission to reject that part of the agreement which allows cellular carriers to restrict access to 911 service. (Page 5, "9-1-1 availability (Par. 41)). We pointed out that the it is in the public interest to require that every 911 call from every cell phone be completed promptly. We pointed out that the participation of public safety agencies in the so called "Consensus Agreement," appeared to be the result of either misinformation from the industry, or undue pressure from the industry based on such misinformation. The Alliance also pointed out the urgent need for a rule requiring that the strongest available signal carry any 911 call made from a cell phone.

There is no credible information contained in any of the comments submitted on the proposed "Consensus Agreement" that would justify allowing any carrier to limit access to 911 emergency service only to "service initialized mobile radio

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`Consensus Agreement' does not represent an all-inclusive industry position".); Nextel, p. 2, fn 2; BellSouth, p. 3; PCIA, p.1, ("the *Agreement* was drafted by only a small portion of the parties responsible for its implementation"); and, Ad Hoc Rural Cellular Coalition, p. 2. ("While CTIA represents a segment of the wireless industry, it does not represent the industry as a whole.")

handsets in a home service area or a subscribed-to roamed service area... ."

There is no dispute concerning the critical importance of 911 access from cellular systems. The public interest unquestionably requires cell carriers to provide prompt, unrestricted access to the nation's emergency 911 system.

The fundamental purpose of the Federal Communications Commission is to make radio service available to all of the people of the United States, at reasonable charges, "for the purpose of . . . promotion of safety of life and property. The importance of 911 and enhanced 911 service to the health and safety of the American public cannot be overstated."[4]

In earlier comments we had the exemplary standard of public service set by GTE Mobilnet who processes all emergency calls "from any handset, even if not service initialized."[5] Now we

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[4] AMTA Comments, p. 4. AMTA went on to state: "It is also apparent that 911 access from cellular systems is highly valuable. The Commission has noted the increasing number of 911 calls initiated by users of cellular telephones, as well as the rapidly growing number of those subscribers. The practice of using cellular units for that purpose has been encouraged by both local government entities and cellular operators and has worked effectively, in large part because cellular users view their phones as personal communications devices that are wireless extensions of their own phone systems."

[5] GTE comments of December 15, 1995, p. 2.

have another, Vanguard, who "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."[6] However, an unfortunate example of a carrier that feels no such commitment is BellSouth,[7] which is one of those cell carriers who block emergency 911 calls from "unauthorized" users. Its rationalization for this iniquitous conduct is that "processing of 911 calls, regardless of the status of the cellular telephone used to place the call, would create the potential for fraudulent and prank 911 calls."[8] BellSouth contends that this potential exists "[d]ue to the interconnection and hand-off problems associated with a unsubscribed/uninitialized handset."[9] In this context it appears that BellSouth defines a "unsubscribed/uninitialized" handset as one that has no Mobile

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[6] Vanguard Comments, p. 2. In footnote 2, Vanguard goes on to state that it "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.

[7] BellSouth acknowledges that **"wireless users roam not only between neighboring wireless markets but also throughout the nation."** (emphasis added). p. 8.

[8] BellSouth comments, p. 10.

[9] BellSouth comments, p. 11.

Identification Number ("MIN") The Alliance believes that this argument is a pretense for denying emergency access to the nation's 911 system from users who are not paying BellSouth a subscription fee for full cellular service. However, in order to obviate this "problem" the Alliance suggests that the Commission require all cell carriers to connect promptly and unconditionally any 911 call from any mobile radio handset with a unique MIN. Such provision would **replace** the requirement set forth under the heading 9-1-1 availability" on page 5 of the "Consensus Agreement."

What is a reasonable cost for access to the nation's 911 emergency system?[10]

US WEST suggested that "Phase I cost recovery issue may be resolved by the simple expedient of applying to wireless customers the same E911 surcharge imposed on many landline customers."[11] The Alliance suggested that the same measure ($.75 per month) be

[10] The cell carriers typically pay the LEC $.10 - . 15 per month for a cell phone telephone number.

[11] US WEST Comments, p. 6.

used.[12] An alternate gauge would be the $12 per year that is charged for roadside call boxes, which amount includes a telephone number. The Alliance also proposed that the Commission take into account the facts that the cell carriers have received the use of billions of dollars worth of spectrum for free and that they are likely to receive other revenues from the deployment of E911 technology (ALI) in determining a reasonable amount of public funds to be given to construct and operate E911 services. In any event, it is obvious that the total amount of public and/or user funds paid over to cell carriers and PSAPs, on a per subscriber basis, should be something less than $.75 to $1 per month.

Various suggestions were made concerning the method of collection of these costs. The Alliance suggested that the full amount of the surcharge be collected at the time of the sale of each cell phone. This approach will give the PSAP some up front capital necessary to construct the facilities they need to handle the increasing 911 cell phone traffic. There were other suggestions as well. The Alliance believes, however, that which

[12] Alliance comments, p. 10.

ever alternative, or combination of alternatives, are selected, they should be federally mandated.[13]

The last vestiges of the tactics of stall and delay have been discredited by the contradictions in the comments filed by wireless carriers.

US WEST states that "[t]here is now little question that [pseudo-ANI and ANI] can be made available in relatively short order."[14] GTE[15] and NEXTEL[16] agree. As the Alliance pointed out in its comments, ANI information is already being provided to PSAPs in Rochester, New York and Seattle, Washington.[17]

KSI states that "location technologies exist today that are capable of meeting the accuracy standards proposed by the NPRM and the Consensus Agreement."[18] NEXTEL believes that five years is "a reasonable time frame for implementation, given the fact that the

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[13] RCA comments, p. 6.

[14] US WEST Comments, p. 4.

[15] GTE comments, p. 3.

[16] Nextel comments, p. 8.

[17] The Alliance comments, p. 16.

[18] KSI comments, p. 2.

technology to achieve such location reliability remains to be defined."[19]

In contrast is BellSouth who contends that "it is still premature to adopt specific requirements and timetables for the provision of E911 services."[20] BellSouth wants more study, more consultation, more delay. US WEST also wants these issues to be "addressed by local or regional negotiations between impacted public safety organizations and impacted carriers."[21] More delay. Furthermore, the US WEST proposal plays into the problem described by Vanguard which "now faces the prospect of different sets of 911 requirements for each state."[22] As the Alliance pointed out in its comments these issues have been pending since late 1992![23] It is very, very clear that more stalling, and more delay is not the in the public interest. If the Commission does

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[19] Nextel comments, p. 5 - 6.

[20] BellSouth comments, p. 1.

[21] US WEST comments, p. 2.

[22] Vanguard comments, p. 4.

[23] The Alliance comments, p. 14.

not now set the E911 goals the deployment of that technology will not occur within a reasonable time.

There appear to be some instances where the deployment of E911 technologies will not be feasible or effective today, especially in rural areas.[24] However, five years is a long time in terms of the rapid development of technology and it is reasonable to believe that more and different solutions will become available, especially if the Commission mandates a time frame and parameters of performance.[25] The Alliance suggests that the Commission handle those situations where E911 cannot be deployed on a timely basis through a temporary waiver process.

It is not appropriate to limit the liability of the wireless carriers.

US WEST states that "it would be most inequitable to hold carriers (or their vendors) liable for mere negligence or unintentional errors in providing a public service requested by the government" ... "any deployment obligation on carriers should be imposed only after the requesting public safety organization

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[24] See: RCA Comments, p. 3.

[25] See for example the news article concerning GPS developments which is attached as "Attachment A".

either agrees to indemnify carriers and their vendors for negligence and unintended errors or obtains immunity for carriers and vendors."[26]

Three vendors filed comments. None asked for immunity! The US WEST proposal is incredible. They want to be paid for providing E911 service but not to be held liable if they fail to do the job properly! There is no reason whatsoever to insulate cell carriers from their own misconduct. The Alliance does agree however, with the comment that users should not be given a "false sense of security" by the deployment of technology that is not always effective.[27] GTE asks the Commission to "include explicit language stating that wireless providers are not required to meet the required location accuracy 100 percent of the time".[28] This is a reasonable suggestion and the Alliance proposes that such

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[26] US WEST, Comments, p. 10. US WEST proposes that the Commission adopt the following language: "A wireless carrier shall not be liable for any form of damages resulting directly or indirectly from the total or partial failure of any transmission or information to an emergency telephone service". Despite the statement to the contrary in footnote 23, on page 10, such broad language would include intentional or wanton or malicious conduct.

[27] Concepts to Operations, Inc. comments, p. 3.

[28] GTE comments, p. 6.

information should be included in an education program for consumers.

The Alliance proposal represents a substantial improvement in public safety and can be accomplished with a trivial software change.

A comment made by Motorola bears repeating:

"Motorola has consistently supported wireless access to enhanced 911 (E911) services for both **ethical** and economic reasons. As a responsible member of the communications industry, Motorola wants to see the most **advanced life saving communications equipment deployed whenever technologically and economically feasible**. In addition, Motorola is well aware that many individuals purchase CMRS equipment in order to better ensure their personal safety."[29]

The Alliance has proposed that the Commission require all future cell phones be equipped to select the strongest signal from either the A side or B side carrier when 911 is dialed. This small change will give the calling party the best chance to complete an emergency call. The Alliance objective can be accomplished with a trivial software change in the handset.[30] The attachments to the Alliance comments demonstrated how critical this small change can be, especially in the instance of portable

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[29] Motorola Comments, p. 2.

[30] Cell phones are already equipped to first scan for the strongest signal on both the A and B side when powered up and the check to see what limits have been imposed on usage for the cell carrier. e.g. "A side only."

cell phones! It is respectfully suggested that "ethical" and "responsible" members of the communications industry should not be blocking access to the 911 system and not finding reasons to refuse to deploy life saving technology which benefits the public unless and until the cell carrier can extract a bottom line profit. In our opinion, companies that engage in these tactics should no longer be stewards of the public air waves.[31]

CONCLUSION

The Commission should adopt rules that provide the public with prompt and unrestricted access to the nation's 911 emergency system at a reasonable cost. The adoption of a mandated time frame and specifications of accuracy for E911 enhancements as set forth in the "Consensus Agreement" should be approved. The Alliance favors short time periods and believes that a temporary waiver process will be the best way of handling instances where

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[31] The Alliance realizes that the appropriate time to raise this issue may be at license renew. However, it seems proper for the Commission to take the opportunity in this proceeding to warn the Wireless Industry that such factors may be considered at the time of license renewal.

the cell carrier should be excused from meeting the set time for deployment of E911 technology.

That portion of the "Consensus Agreement" on page 5, entitled "9-1-1 availability" is the antithesis of availability of access to the nation's 911 emergency system at a reasonable cost. This portion of the "Consensus Agreement" should be rejected. In its stead, the Commission should substitute the following:

> **"9-1-1 availability cell carriers shall promptly and unconditionally connect any 911 call from any mobile radio handset with a unique MIN."**

The Commission will thus have accomplished the ANI/call back objective without permitting cell carriers to block emergency calls.[32]

Respectfully Submitted

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March 11, 1996

[32] The PSAP will be able to contact all cell phones with a MIN through the local roamer port in the same manner as the cell carriers propose to connect so-called "authorized" roamers.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Reply Comments of the Ad Hoc Alliance for Public Access to 911 Opposing Certain Provisions of the Consensus Agreement" were served this 11th day of March, 1996, by first class mail, postage prepaid, on the parties of the attached list.

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