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March 29, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

BY HAND

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Permissible Ex Parte Presentation in
CC Docket No. 94-102

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's rules, this is to inform the Commission that the attached letter regarding the above-referenced proceeding (along with a copy of this cover letter) was delivered today to the following Commission personnel:

Chairman Reed Hundt
Commissioner James Quello
Commissioner Susan Ness
Commissioner Andrew Barrett
Commissioner Rachelle Chong
Ms. Regina Keeney
Ms. Kathleen Levitz
Mr. Alan Thomas

Two copies of the letter are attached for the Commission's files.

Please contact the undersigned if you have any questions.

Respectfully submitted,

WILKES, ARTIS, HEDRICK & LANE
Chartered

By:


Robert M. Gurss

Attorneys for Telident, Inc.

cc: Martin Moody

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March 28, 1996

The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20054

RE: Ex Parte Communication in CC Docket 94-102

Dear Mr. Chairman:

Telident understands that the Commission is actively considering an order in the above-referenced docket to adopt rules regarding Enhanced 9-1-1 service and the compatibility of PBX's, KTS's, and Centrex systems. Telident, Inc., is a Minnesota corporation engaged in research, development, design, manufacture and sale of Enhanced 9-1-1 telecom communications equipment and services.

The following information is offered to address two issues which may have been raised recently with you and your staff concerning this proceeding. The term Multi-line Telephone System (MLTS) will be used to refer to Private Branch Exchange (PBX) systems, Key Telephone Systems (KTS), as well as Centrex, Central Office based telephone systems.

The first issue concerns the scope of any requirement that specifies MLTS equipment installations be compatible with Enhanced 9-1-1. Neither Telident nor any other party has suggested that every MLTS be modified or replaced. For example, MLTS operations contained within a single, clearly delineated location may already be compatible with Enhanced 9-1-1. A key factor in any Commission guideline in this regard should be whether the MLTS serves multiple locations (e.g., users located in different suites, floors, buildings or even cities served by a single (networked) MLTS regardless of the number of stations). As an example, many school districts have a single MLTS for all of their school and maintenance buildings, but typically have a very small number of phones overall. As described in the APCO/NENA survey submitted to the Commission on February 6, 1996, such multiple address MLTS sites pose a common and serious problem for public safety agencies throughout the nation. These MLTS installations must have full Enhanced 9-1-1 compatibility so that public safety responders can locate callers in times of emergency.

The second issue concerns the requirement for the MLTS owner/administrator to coordinate the Automatic Location Identification (ALI) record information with the Enhanced 9-1-1 services provider. This is the data that is used by the public safety

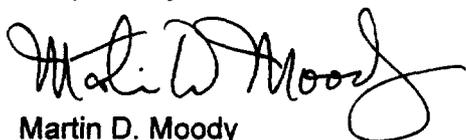
March 28, 1996
The Honorable Reed Hundt
Page Two

agency, and appears on the screen of the Enhanced 9-1-1 emergency operator. This data enhances the capabilities of the 9-1-1 call taker to accurately locate the 9-1-1 caller who may be unable to provide their exact location (for any of a variety of reasons). The Enhanced 9-1-1 service provider must define data formats and data transfer procedures to allow the MLTS owner/administrator to coordinate moves/adds/changes at the MLTS facility(ies) with the corresponding Enhanced 9-1-1 ALI database records. The enclosed map provides an overview of the available ALI database management programs that are available and tariffed today. The programs have different names based on the Enhanced 9-1-1 service provider, but accomplish the same tasks. For instance, Ameritech, Bell Atlantic, and Bell South are utilizing Premier PS/ALI. GTE, Pac Bell, SWBT and US West currently have their own systems. NYNEX is waiting for the FCC ruling before they tariff their offering. Attached are representative covers, and tables of contents, showing the level of assistance and documentation available to support the MLTS owner/administrator.

In summary, MLTS installations that are not currently compatible with Enhanced 9-1-1 can utilize available techniques and/or technology to achieve compatibility. The Enhanced 9-1-1 service providers have the capabilities to provide both network (ANSI T1.411-1995) and ALI database interfaces today for the MLTS installations (and only those installations) that are not currently compatible with Enhanced 9-1-1, and cannot achieve compatibility in any other way.

Telident hopes that this information is helpful in the Commission's deliberations on this important public safety issue. Please do not hesitate to contact us if you need additional information.

Respectfully submitted,

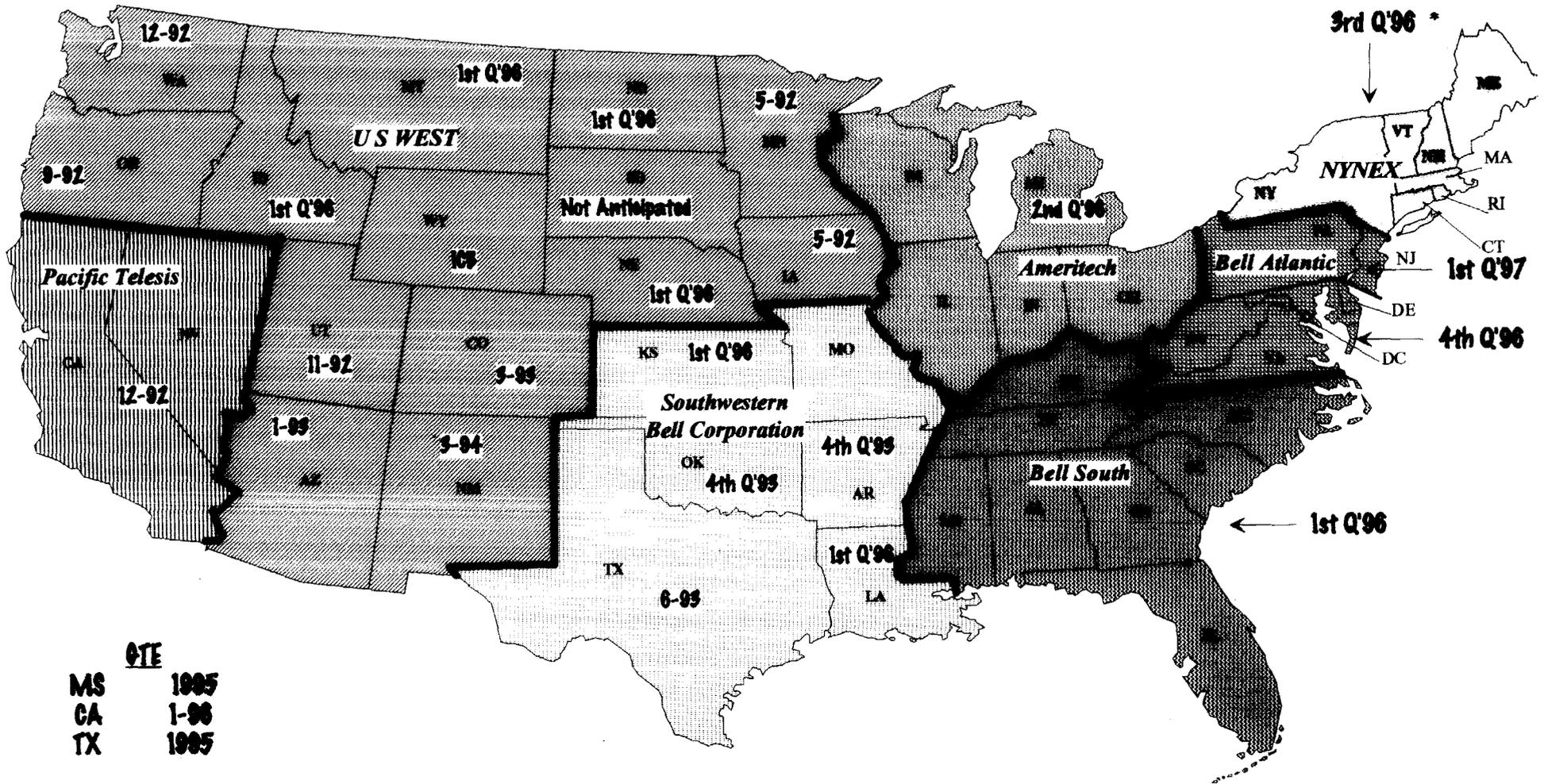


Martin D. Moody
Vice President of Advanced Engineering
TELIDENT, Inc.

MDM/sms

Attachments: Map
PS/ALI Cover sheets and indexes

PS/ALI Tariffs



QTE
 MS 1995
 CA 1-96
 TX 1995

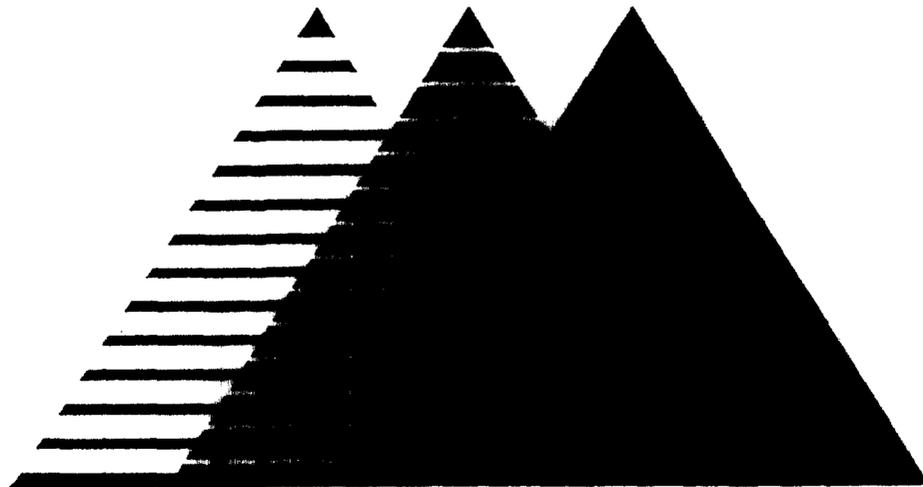
Sprint
 FA 1994

* pending FCC docket 94-102 resolution

GTE

**Private Switch
Automatic Location Identification**

PS ALI



User Guide

*Copyright GTE Corporation 1994
PSA LI Version Beta 7.0
User Guide (5/20/94)*

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Private Switch - ALI (PS/ALI)

Software Requirements Specifications

Version 1.0
June 19, 1995

James Nerney
(510) 671-5987

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PREMIER PS/ALI™

Version 1.03

**Reference
Guide**



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PS/ALI

Private Switch/Automatic Location Identification

USWEST COMMUNICATIONS 

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