

# Ad Hoc Alliance for Public Access to 911

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Alliance for Technology Access•Arizona Consumers 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

June 3, 1996

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

RECEIVED  
JUN 4 1996  
Federal Communications Commission  
Office of Secretary

Re: CC Docket No. 94-102  
Ex Parte Communication

Dear Mr. Caton:

Attached is a letter that was delivered today to Mr. John Cimko of the FCC's Wireless Bureau regarding the above referenced docket. This is in follow-up to a meeting that was held on May 30, 1996 in the office of Mr. Cimko where these issues were discussed.

Sincerely,



Jim Conran  
President  
Consumers First

Enclosure

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June 3, 1996

Mr. John Cimko, Jr.  
Chief, Policy Division  
Wireless Telecommunications Bureau  
Room 5202  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Re: CC Docket No. 94-102

Dear Mr. Cimko:

Following up on our meeting last week I wanted to provide you with our thoughts on the forthcoming FCC ruling regarding public access to 911 emergency services via cellular telephones.

We commend the efforts of the FCC staff in carefully reviewing the issue regarding cellular phone users accessing 911 services. **A Commission decision to require cellular companies to provide immediate, non-validated access to 911 services for anyone using a cellular phone with a unique min would be an important step to meeting our concerns.** Allowing individual PSAPs to determine whether they will accept non-min calls also appears to be a reasonable alternative as long as the cellular companies maintain the ability to accept and pass on all 911 calls without blocking (except on the specific instructions from the PSAP for non-min calls). I suggest that the Commission address how the individual PSAP's decision on accepting or declining non-min calls will be provided to the local cellular companies. This can be handled in a quick survey of the existing PSAPs that would also be made available to the public. In addition, I hope that the Commission consider how to make enhanced 911 services available to non-min phones at some point in the near future as well as consider ways to provide additional funding mechanisms supporting 911 services from cellular callers.

**I also suggest that the Commission address the Alliance's concerns about ensuring that 911 cellular callers have access to the strongest available signal.** As you know, we brought this issue before the Commission in our original petition for rulemaking last year. This was incorporated in the FCC docket over the past year and, despite few comments on the issue,

we feel there has been adequate public notice. We hope that the Commission will take action on this issue in this rulemaking.

We recognize that the strongest signal issue is one that resides in the software of the cell phones rather than the cellular transmission sites. We also recognize that going back to require all existing cell phones to conform to this rule would be a massive, and expensive proposition. Therefore, **we suggest the Commission require all cellular phones manufactured after January 1, 1997 have the ability to connect to the strongest available compatible signal when first placing 911 calls.** Adopting such a policy would result in a relatively simple software change for new cell phones and has three advantages:

- First, this is a *forward-only* policy and does not affect cell phones currently in use or being marketed.
- Second, this policy only affects *compatible* signals and would not require cell phones to connect with other types of signals.
- Finally, the connection to the strongest signal would only be required at the point of *call origination* and, once connected, the call would be handled like all other calls on the system and would not have to be handed off to different carriers once placed.

I thank you for the time and attention you have provided regarding this critical issue and look forward to the Commission's final decision.

Sincerely,



Jim Conran  
President,  
Consumers First

cc: Members of the Federal Communications Commission  
The Honorable Anna Eshoo  
Mr. William F. Caton, Secretary to the Commission