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**NATIONAL RETAIL FEDERATION**

January 8, 1996

**The Honorable Geraldine Matisse**  
Chief, Network Services Division  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Ms. Matisse:

The National Retail Federation (NRF) is concerned about the possible impact on retailers of the Commission's upcoming decision in Common Carrier Docket 94-102 relating to ensuring compatibility with enhanced 911 emergency calling systems.

If the FCC requires all multi-line telephone system units to be able to dial 911 without a prefix, the impact on retailers could be substantial. Most telephone lines in stores (in departments, for instance, or at cash registers) are now able to dial only "inside" numbers. For these stores, if someone in a store requires emergency help, the current method is to place a call to a call center operator and have that person phone 911. This not only effects a speedy response but ensures that store personnel are informed when there is an emergency. Call centers are staffed with multiple employees and are operational, in most cases, 24 hours per day.

If the FCC requires all callers to be able to make 911 calls themselves, we fear a decrease of emergency service in some cases. In those instances when 911 operators phone back to the originating line to provide telephone assistance, there is the possibility that there would not be a sales assistant present to take the EMS operator's direction relating to CPR or other emergency procedures. Leading retailers tell us that their staff have been able to assist associates and customers through 911 instructions.

Requiring all of these phones to be able to dial outside lines would have substantial cost and operational impacts as well. Retailers would need to install substantially more phone lines, driving up costs. Retailers would face exposure to toll fraud, since customers and store associates alike would be able to dial the "9-1" combination, which on many telephone systems signals functions instead of numbers. Retailers also fear false alarms which might pose liability problems. Coupled with the necessity of swapping out existing PBXs to achieve this functionality, this new regulation would work a hardship on all retailers, particularly smaller to mid-sized stores.

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Common Carrier Bureau  
Network Services Division  
Office of the Chief

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*The World's Largest Retail Trade Association*

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Retailers instead hope that the Commission will adopt a less extreme position and allow operations to remain as they are. We would urge that requirements to retrofit equipment be eliminated, and that consideration be given to the unique situation of retailers and others who serve the public.

The **National Retail Federation** (NRF) is the world's largest retail trade association with membership that includes the leading department, specialty, discount, mass merchandise and independent stores, as well as 32 national and 50 state associations. NRF members represent an industry that encompasses over 1.4 million U.S. retail establishments, employs more than 20 million people, 1 in 5 American workers, and registered 1995 sales of \$2.3 trillion.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cathy Hotka', written over a printed name.

Cathy Hotka  
Vice President

Information Technology