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January 30, 1997

Regina Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: Ex Parte Presentation
CC Docket 92-105 (Use of N11 Codes and Other Abbreviated Dialing
Arrangements; Request of the Department of Justice that 311 Be Reserved for
Non-emergency Police Telephone Calls)

Dear Ms. Keeney:

AT&T Wireless Services, Inc. ("AT&T Wireless") reiterates the support expressed in the October 10, 1996 comments of AT&T Corp. for reserving 311 (or another N11) nationwide for non-emergency police calls. As AT&T Corp. noted, however, there are a number of practical issues that the Commission must resolve before it establishes guidelines and implements N11 code non-emergency use on a nationwide basis. The purpose of this *ex parte* submission is to bring to your attention several technical and administrative concerns specific to the wireless industry that must be addressed to ensure the successful establishment of a nationwide non-emergency calling system.

First, the Commission must reject any attempts to make a 311 non-emergency calling system a duplicate of the 911 emergency calling system. The premise underlying the reservation of 311 for non-emergency dialing is that the calls lack the urgency of a 911 call. The non-emergency nature of the calls eliminates any need to require the transmission of Automatic Number Identification, cell site origination information or any other form of location information. If such information is needed, it can be supplied by the caller, who by dialing 311 clearly expects the call to be handled in a non-urgent manner. If 311 instead were to be treated as a clone of E911, the implementation of a wireless 311 plan needlessly will become ensnared in the same tangle of implementation and cost recovery issues associated with the deployment of E911. Chief among the unresolved questions for E911 is exactly who will pay for the expensive system upgrades associated with the provision of location information.

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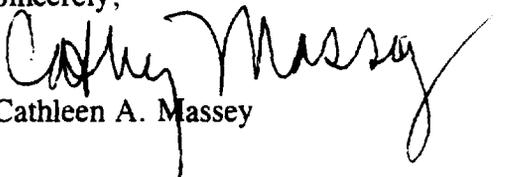


Second, if the Commission decides to develop a plan to implement a 311 nationwide, non-emergency calling plan, it should require wireless carriers to forward only those 311 calls that originate from "service initialized" handsets, i.e., (1) all of the carrier's subscribers in its home area and (2) all users authorized to roam on a carrier's network. The Commission's E911 rules mandate transmission of all wireless 911 calls, even those from non-subscribers, if the PSAP elects to receive those calls. AT&T Wireless, along with many other wireless carriers, have requested that the Commission reconsider that decision because it poses difficult technical problems for service providers and is likely to increase fraudulent and prank calls to 911.¹ Regardless of whether the Commission ultimately reverses its decision as to 911 calls, it should not impose a similar obligation upon the processing of 311 calls. The advocates for requiring carriers to transmit calls from non-service initialized phones based their request upon the urgent nature of the calls.² An extension of this controversial requirement would therefore be inappropriate in a non-emergency setting.

Finally, as AT&T Corp. mentioned in its comments, there are other numerous open questions that must be resolved before a non-emergency calling system can be established, not the least of which is cost-recovery and funding.³ AT&T Wireless urges the Commission to establish clear cost recovery standards at the federal level to avoid state-by state wrangling that could delay the roll out of the service. A fair funding mechanism for this type of program must address the compatibility of wireless and wireline services and the equitable distribution of costs among various industry segments.

In conclusion, to ensure the successful establishment of a N11 code for nationwide, non-emergency use AT&T urges the Commission to establish guidelines for and implement 311 use in a manner consistent with the character of the service.

Sincerely,



Cathleen A. Massey

cc: Rudy Baca
Michele Farquhar
Julius Genachowski
David Siddall
Suzanne Toller

¹Petition For Reconsideration of AT&T Wireless Services, Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Doc. No. 94-102 (the "E-911 Proceeding"). See also, Petition for Reconsideration and Clarification of the Cellular Telecommunications Industry Association.

²See, e.g., Comments of the Ad Hoc Alliance for Public Access to 911, E911 Proceeding.

³For example, if 311 traffic is routed to a single point, the costs of implementing the program may be dramatically less than a plan that requires routing to multiple termination points.