

CC94-107

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APR 29 1997

Federal Communications Commission  
Office of Secretary

**NORTEL**  
NORTHERN TELECOM

April 16, 1997

Ms. Anne Bisese  
Engineer  
Federal Communications Commission  
Common Carrier Bureau  
Network Services Division  
2000 M Street, NW  
Washington, D.C. 20554

Dear Anne:

Attached, per your request, are responses to the questions you forwarded on April 10 regarding Enhanced 911 Emergency Calling Systems and the issue of attendant notification. Please feel free to contact us should you have any questions or need any additional information.

Sincerely,

*Raymond Strassburger* (MTA)

Raymond L. Strassburger  
Director, Government Relations - Telecommunications Policy

cc: Erik Hansson, Nortel  
Donna Logan, Nortel  
Maria Tilves-Aguilera, Nortel

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DATE

Following are responses to the questions posed by the FCC to the Nortel Meridian product team regarding the issue of "Attendant Notification".

- 1) Does existing PBX equipment have an "Attendant Notification" capability? If so, please describe this capability.**

Nortel and a number of third-party vendors offer products which have the ability to provide on-site notification for the Meridian 1. The focus of our responses pertains only to the capabilities which Nortel specifically offers to Meridian 1 authorized distributors. The FCC should solicit information regarding other third-party vendors equipment if they so desire.

With Meridian Private-switch Emergency Notification PC Software (ENS), Meridian 1 has the capability of providing on-site notification of an in-progress 9-1-1 call to on-site personnel. That personnel may be an attendant, on-premise security guard, or other designated party. On-site notification is provided via software on a personal computer at the desktop of the designated party. If the designated party cannot physically monitor the PC, notification can be provided via a pager.

- 2) What is required to support this capability? Software/Hardware?**

ENS is PC software. It is supported on a Microsoft Windows 95-compatible PC. It requires an RS-232 connection to a Meridian Private-switch Emergency Response Unit (ERU). The ERU is a free-standing or wall-mountable unit connected to the Meridian 1 via a digital telephone line.

- 3) Are there different types of "Attendant Notification" systems? Please describe.**

Meridian Private-switch Emergency Notification PC software is the only private 9-1-1 on-site notification solution offered for Nortel's Meridian 1 system at this time.

- 4) Can older PBX systems be back-fitted to include "Attendant Notification"? How costly?**

Meridian Private-switch Emergency Notification PC Software requires the ERU which is supported on Meridian 1 X11 Release 14 or later software. The cost to add the ERU and ENS on installed systems is the same as to add it on new systems (please see question #6).

- 5) **Do the newly manufactured PBX systems have the option of having this capability?**

Yes.

- 6) **What is the cost to include this capability in new systems?**

Nortel offers the ERU and ENS hardware and software to Meridian 1 authorized distributors. List prices to these distributors for the ENS and ERU totals approximately \$20,000. Installation and maintenance charges are not made by Nortel, as these are services provided by Meridian 1 distributors.

- 7) **Is there a size limitation, i.e., the number of stations, regarding whether "Attendant Notification" is incorporated into a system?**

No, there is not a limit to the number of stations on a Meridian 1 system that can take advantage of ENS' capability for on-site notification of in progress 9-1-1 calls. Additionally, multiple PCs can be configured to provide on-site notification.



**NEC**

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NEC America, Inc.  
Corporate Networks Group  
1655 W. Walnut Hill Lane  
Irving, Texas 75038-3796  
Tel. 214-751-7000

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APR 29 1997

April 21, 1997

Federal Communications Commission  
Office of Technical Services

Anne Bisese  
Engineer  
Federal Communications Commission  
2000 M Street, N.W., Room 210J  
Washington, D. C. 20554

Subject: Response to the Issue of "Attendant Notification"  
CC Docket No. 94-102  
Revision of the Commission's Rules to ensure  
Compatibility with Enhanced 911 Emergency Calling Systems

Dear Anne:

The following is a list of each of the questions accompanied by our answers which applies to our equipment as you requested in your fax dated April 16, 1997.

1. *Does the existing MLTS equipment have an "Attendant Notification" capability? If so, how do you define "Attendant Notification"?*

ANS. We can provide the Emergency Call Monitor {E-21} feature for Hotel/Healthcare configured systems. There is also E911-OAI for NEAX2400 and other systems.

2. *What is required to have this capability? Software/Hardware?*

ANS. The Emergency Call monitor {E-21} for Hotel Systems only require external relays and bells for audible notification. E911-OAI for other systems require both hardware and software. As the E911-OAI is an OAI application, the systems must be completely equipped with the OAI UAP (User Application Processor, VT100 terminal, and the necessary software). Some older software, that did not support OAI, would require an upgrade to a software platform that does support OAI.

The NEAX2400 ICS does support E911 without "Attendant Notification." In this manner, no extra hardware or software is necessary.

3. *Are there different types of "Attendant Notification" systems? Please describe.*

ANS. Emergency Call Monitor for hotels triggers an external bell/alarm whenever a CAMA trunk is seized. The Attendant then dials a special access code and enters the conversation. At the same time, the Console displays the Guest Name and Room (for guests) or station number and name (for Administration stations).

E911-OAI - The NEAX2400 can be equipped with an emergency software package called "OAI Emergency 911 (E911)". The "Emergency 911" application provides the system operator with real-time emergency support. A telephone caller (resident, patient, employee) confronted with an emergency, has only to dial a short, easy-to-remember number. E911-OAI monitors an emergency number, connects an

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# NEC

NEC America, Inc.

incoming call to your line, and displays critical information about the call location and the caller, including but not limited to station number. Then, with one or two key strokes, a system operator can transfer the call to an emergency agency. E911-OAI can also be set up to record conversations with callers.

4. *Can older MLTS systems be back fitted to include "Attendant Notification?" If so, is hardware or software or both required? How costly?*

ANS. The NEAX2400 systems require 4200V6 or 5200 Release II and higher software to support the E911-OAI capability. Cost varies with system configuration and desired software platform to be implemented. Emergency Call Monitor is available on all Hotel software back to 2000 Series (1986 introduction).

5. *Do the newly manufactured MLTS systems have the option of having this capability?*

ANS. Yes

6. *What is the cost to include this capability in new systems?*

ANS. E911-OAI - Cost is a direct relation to the configuration of the new system. As such, it varies with the system to be provided with this capability.

Emergency Call Monitor - Only requires the cost of the external relay(s) (one per CAMA trunk) and external bell.

7. *Is there a size limitation, i.e. number of stations, regarding whether "Attendant Notification" is incorporated into a system? What do you consider a "small" MLTS? Please express in terms of lines and station capability.*

ANS. The NEAX2400 ICS can be provided with either Emergency Call Monitor (on Hotel configured systems) or E911-OAI on the smallest 384 port IMGx to the largest 24,576 UMG.

8. *What is the smallest system that you manufactured that has internal "Attendant Notification" capability?*

ANS. Neither Emergency Call Monitor (requiring external bell and relays) or E911-OAI (requiring external UAP and VT100 terminals(s)) could actually be considered "internal attendant notification."

9. *What is the smallest system that you manufactured that does not have internal "Attendant Notification" capability but can support an external device that will give "Attendant Notification" capability?*

**NEC**  
NEC America, Inc.

ANS. Answered in question 7.

10. *What percentage of your small MLTS customers request "Attendant Notification" capability?*

ANS. Have not had many requests for "Attendant Notification", only the support of E911 to the PSAP.

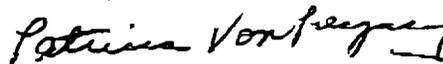
11. *Do your owner/operator instructions include information on E-911? Do you think this would be helpful to your customers?*

ANS. *Only on how to enable/provide/program the capability within the PBX.*

*I think a detailed "white paper" would be very helpful to our customers to enable them to understand exactly what E911 is, what is required of them, and various options available to comply with providing E911.*

*If you should require additional information, please feel free to contact me.*

Very truly yours,

  
Patricia Von Preysing  
Regulatory Assistant



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Federal Communications Commission  
Office of Secretary

William S. Katon  
Secretary of the FCC  
1919 M Street, Room 222, NW  
Washington, DC 20554  
Fax: 202/418-0294

RE: CC Docket No. 94-102  
COMMON CARRIER BUREAU SEEKS COMMENT ON ENHANCED 911 WIRELINE  
CONSENSUS AGREEMENT

Dear Mr. Katon:

I am responding to the recent public notice of the Enhanced 911 Wireline Consensus Agreement. I am the product manager for SCC Communications. SCC Communications is the largest and fastest growing provider of services and information technology systems for the public safety market in North America. We are the leading provider of 9-1-1 database management infrastructure in North America. One of our products we offer plays an integral part in managing ANI/ALI data for Multi-line Telephone System (MLTS) users. Private Switch ALI (PS/ALI) provides access to the 9-1-1 database and data management functions to owners of MLTS. Currently, Ameritech, U S West, and Bell South distribute PS/ALI within their regions to their business customers. We also have several ALEC customers that have the option to deploy the tool at their business customer's site.

I have reviewed the Enhanced 911 Wireline Consensus Agreement and would like to provide a few comments. The comments that I present, ironically, are not derived from any business or product concerns, but are based purely in what I intuitively know as an employee or what I have experienced while employed in the public safety industry.

1.) Square Footage Requirement - Intuitively speaking, I think 40,000 square feet is too large of an area to search in the precious few minutes a responding unit has to revive a seriously ill or injured caller. Take SCC as a case in point: If I dialed 9-1-1 from my office, I would not be comfortable that responders would be able to find me in time if I had a serious heart attack. SCC is an 80,000 square feet, single address facility, thus making it a "Level Two Business Location". I am assuming that for minimum compliance and for logical reasons, we would divide our building into two floors, with my office being on the first floor. Searching the first floor with its 40,000 square feet maze of cubicles, offices and conference rooms would take too long! I am certain that my situation is not uncommon in the "Level Two Business Locations" category.

I feel that a 20,000 square feet minimum requirement would be more palatable, however I am not nor never have been, an emergency responder. Certain justifications about the 40,000 square feet requirement from the public safety community would be prudent.

2.) I propose that a specific definition of what an "adequate signaling and response system" consists of is necessary. At a minimum, the public safety community should define what minimum information is required for adequate response instead of leaving this matter with the "workplace safety authorities" who may or may not be in touch with their local PSAP's response needs.

3.) Business Locations MLTS that are exempt because they have an "adequate signaling and response system", should also have an attendant available at all times, i.e. 24 hours. Attendant availability was not clear in the Business Locations MLTS as it was under the Permanent Resident and Large Hotel/Motel MLTS.

4.) The maximum compliance time of 7 years for most of the Business Locations MLTS seems a bit too lenient. Although, completely unpredictable, a case can be made that the new rules probably will save several *more* lives if a 5 year timeframe is required instead (as in the Wireless Phase Two requirement).

I appreciate the opportunity to submit my concerns. I do hope that this reaches you in time as I had trouble getting a copy of the consensus agreement (ITS is very unreliable). If you have any questions, you may reach me at 303/581-5751.

Sincerely,



Victoria Mills

# IWATSU AMERICA, Inc.

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430 Commerce Boulevard, Carlstadt, New Jersey 07072  
Phone: (201) 935-8580 Fax: (201) 935-6711

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FEDERAL COMMUNICATIONS COMMISSION  
CC DOCKET No.94-102

Federal Communications Commission  
Office of the Secretary

Revision of the Commission's Rules to Ensure  
Compatibility with Enhanced 911 Emergency Calling Systems

Request for Information from Concerned Parties Surrounding April 16, 1997  
the Issue of "Attendant Notification"

The following constitutes the response of Iwatsu America, Inc. to your request for information concerning "Attendant Notification".

**PREFACE:** Iwatsu America's products consist of the ADIX Business Communication System and the ZT-S Small Business Key Telephone System. The two systems vary in characteristics.

**ADIX**

The ADIX system is a digital system that may be configured from system sizes representing 52 to 448 digital ports. Ports are utilized for all combinations of trunk, station, and miscellaneous equipment. ADIX equipment and software is compatible, from the smallest to the largest configuration. Therefore, software controlled operating features operate identically for the most part on all system configurations. The ADIX system is registered under Part 68 of the rules as a Key Telephone System, Multi-function (Hybrid), and PBX. Programming the system for trunk access and the type of trunks utilized determines the configuration. The ADIX-S, with its 52 port configuration may be used for small business MLTS, while larger sizes are normally configured for Hybrid and PBX operation.

**ZT-S**

The ZT-S is software controlled analog Key Telephone system for small MLTS applications providing for a fixed maximum capacity of six (6) CO lines and sixteen (16) extensions in a key system configuration.

1. Does existing MLTS equipment have an "Attendant Notification" capability? If so, how do you define "Attendant Notification"?

ANS: Both the ADIX and ZT-S system do not have "Attendant Notification" capability.

2) What is required to have this capability? Software/Hardware?

ANS: A future software release for the ADIX system would be required. The ZT-S would be unsuitable for adding the feature.

3) Are there different types of "Attendant Notification" systems? Please describe. N/A

4) Can older MLTS Systems be back fitted to include "Attendant Notifications"? If so, is hardware or software or both required? How costly?

ANS: In the event that Iwatsu developed the software to provide the "Attendant Notification" capability on the ADIX system, older versions of the system that utilize the same system processor hardware as the current model would be able to upgrade the software at a charge. ADIX systems not utilizing the current versions of system processor hardware would require both hardware and software changes. As regards any product lines manufactured

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discontinued, the cost and difficulties to upgrade these products would not be practical for either the manufacturer and the end user.

5) Do the newly manufactured MLTS systems have the option of having this capability?

ANS: In order to have "Attendant Notification" capability on the ADIX system, new software would have to be developed. The ZT-S would not be suitable for including this capability in the future.

6) What is the cost to include this capability in new systems?

ANS: Software development for all variations of systems (Key System, Hybrid, and PBX) would cost Iwatsu approximately \$80--100K in development costs. This would be subject as well to any other requirements for support of E-911 that the FCC order may entail. Upgrade costs to the user is difficult to define since it would entail mark-up by distribution, possible hardware as well as installation cost.

7) Is there a size limitation, i.e. number of stations, regarding whether "Attendant Notification" is incorporated into a system? What do you consider a "small" MLTS? Please express in terms of lines and station capability.

ANS: In the event "Attendant Notification" capability was added to the ADIX system, all sizes of systems, including small MLTS in all probability could support "Attendant Notification". Since all hardware and software is compatible for all port configurations, no restrictions may exist. For marketing purposes, the ADIX-S providing a maximum 52 port configuration may be considered as "small" MLTS.

8) What is the smallest system that you manufacture that does have internal "Attendant Notification" capability?

ANS: None.

9) What is the smallest system that you manufacture that does not have internal "Attendant Notification" capability but can support an external device that will give "Attendant Notification" capability?

ANS: None.

10) What percentage of your small MLTS customers request "Attendant Notification" capability?

ANS: None to our knowledge.

11) Do your owner/operator instructions include information on E-911? Do you think this would be helpful to your customers?

ANS: Presently, the ADIX system is compatible with E-911 using third party equipment. Iwatsu sells its equipment through authorized distributors who the sell and install the product at the end user. Iwatsu provides information on its products both to the distributor/installer as well as the end user. As a manufacturer and as a matter of course, we would support providing information on E-911 for both our distributors and the end users of our products.

  
Robert E. Chrostowski  
Senior Vice-president

April 21, 1997

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In the matter of

APR 29 1997

FEDERAL COMMUNICATIONS COMMISSION  
 CC Docket No. 94-102  
 Revision of the Commission's Rules to Ensure  
 Compatibility with Enhanced 911 Emergency Calling Systems

Federal  
 Communications  
 Commission

In response to the Request for Information Surrounding the Issue of "Attendant Notification" of April 10, 1997, Lucent Technologies, Inc. Business Communications Division submits the following, which is to be included in the Public Record in CC Docket No. 94-102.

**For DEFINITY®**

- 1) Does existing PBX equipment have an "Attendant Notification" capability? If so, please describe this capability.

The DEFINITY® product line has this capability in the GuestWorks® system and Release 5 or later system. When a station user calls the specified Emergency number, Attendant consoles and multifunction telephones programmed to be notified receive an audible and visual (blinking button led) notification of this call. The user can identify the calling extension on the terminal display.

- 2) What is required to have this capability? Hardware/Software?

DEFINITY® GuestWorks® or Release 5 or later software is required.

- 3) Are there different types of "Attendant Notification" systems? Please describe.

Attendant Notification may be provided through adjunct systems. These systems have optional features for a variety of notifications depending on the system selected.

- 4) Can older PBX systems be back fitted to include "Attendant Notification"? How Costly?

In many cases, older systems could not be retrofitted to support this functionality due to memory and/or processor capacity constraints. As for the earlier releases where it would be possible to retrofit through Custom Development, it would be less expensive in most cases to upgrade to current releases.

- 5) Do the newly manufactured PBX systems have the option of having this capability?

Current DEFINITY® Release 5 and GuestWorks® systems have this capability and may be implemented at the customer's option at no charge.

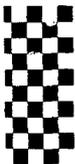
- 6) What is the cost to include this capability in new systems?

Lucent does not charge for this functionality where it is available.

- 7) Is there a size limitation, i.e. number of stations, regarding whether "Attendant Notification" is incorporated into the system?

No limitation exists in the specified DEFINITY® releases.

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**For Merlin Legend® as a PBX**

- 1) Does existing PBX equipment have an "Attendant Notification" capability? If so, please describe this capability.  
The Merlin Legend® does not have this capability.
- 2) What is required to have this capability? Hardware/Software?  
Not Applicable
- 3) Are there different types of "Attendant Notification" systems? Please describe.  
Not Applicable
- 4) Can older PBX systems be back fitted to include "Attendant Notification"? How Costly?  
In many cases, older systems could not be retrofitted to support this functionality due to memory and/or processor capacity constraints.
- 5) Do the newly manufactured PBX systems have the option of having this capability?  
Not at this time.
- 6) What is the cost to include this capability in new systems?  
Not Applicable
- 7) Is there a size limitation, i.e. number of stations, regarding whether "Attendant Notification" is incorporated into the system?  
Not Applicable

Post-it™ Fax Note	7671	Date	# of pages ▶ 2
To	Ariale Bisesse	From	A. Bertagnolle
Co./Dept.	FCC CCB	Co.	Lucent Tech
Phone #	202 4182344	Phone #	908 953 7836
Fax #	202 4182345	Fax #	908 953 4906

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In the matter of

FEDERAL COMMUNICATIONS COMMISSION  
 CC Docket No. 94-102  
 Revision of the Commission's Rules to Ensure  
 Compatibility with Enhanced 911 Emergency Calling Systems

Federal Communications Commission  
 Washington, D.C. 20541

In response to the Request for Information Surrounding the Issue of "Attendant Notification" of April 10, 1997, Lucent Technologies, Inc. Business Communications Division submits the following, which is to be included in the Public Record in CC Docket No. 94-102.

**For DEFINITY®**

- 1) Does existing PBX equipment have an "Attendant Notification" capability? If so, please describe this capability.

The DEFINITY® product line has this capability in the GuestWorks® system and Release 5 or later system. When a station user calls the specified Emergency number, Attendant consoles and multifunction telephones programmed to be notified receive an audible and visual (blinking button led) notification of this call. The user can identify the calling extension on the terminal display.

- 2) What is required to have this capability? Hardware/Software?

DEFINITY® GuestWorks® or Release 5 or later software is required.

- 3) Are there different types of "Attendant Notification" systems? Please describe.

Attendant Notification may be provided through adjunct systems. These systems have optional features for a variety of notifications depending on the system selected.

- 4) Can older PBX systems be back fitted to include "Attendant Notification"? How Costly?

In many cases, older systems could not be retrofitted to support this functionality due to memory and/or processor capacity constraints. As for the earlier releases where it would be possible to retrofit through Custom Development, it would be less expensive in most cases to upgrade to current releases.

- 5) Do the newly manufactured PBX systems have the option of having this capability?

Current DEFINITY® Release 5 and GuestWorks® systems have this capability and may be implemented at the customer's option at no charge.

- 6) What is the cost to include this capability in new systems?

Lucent does not charge for this functionality where it is available.

- 7) Is there a size limitation, i.e. number of stations, regarding whether "Attendant Notification" is incorporated into the system?

No limitation exists in the specified DEFINITY® releases.

System size ranges from 8 trunks/8 stations to 4,000 trunks/25,000 stations

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**For Merlin Legend®**

- 1) Does existing PBX equipment have an "Attendant Notification" capability? If so, please describe this capability.

.The Merlin Legend® does not have this capability.

- 2) What is required to have this capability? Hardware/Software?

Not Applicable

- 3) Are there different types of "Attendant Notification" systems? Please describe.

Not Applicable

- 4) Can older MLTS systems be back fitted to include "Attendant Notification"? How Costly?

In many cases, older systems could not be retrofitted to support this functionality due to memory and/or processor capacity constraints.

- 5) Do the newly manufactured MLTS systems have the option of having this capability?

Not at this time.

- 6) What is the cost to include this capability in new systems?

Not Applicable

- 7) Is there a size limitation, i.e. number of stations, regarding whether "Attendant Notification" is incorporated into the system?

Not Applicable

System sizes range from 4 lines or trunks/ 8 stations to 80 lines or trunks/200 stations

Attendant notification of a call to 911 is a planned enhancement.  
It is expected that the Legend will work with an adjunct in the future.

**For the Partner® MLTS**

- 1) Does existing PBX equipment have an "Attendant Notification" capability? If so, please describe this capability.  
 .The Partner System® does not have this capability.
- 2) What is required to have this capability? Hardware/Software?  
 Not Applicable
- 3) Are there different types of "Attendant Notification" systems? Please describe.  
 Not Applicable
- 4) Can older PBX systems be back fitted to include "Attendant Notification"? How Costly?  
 No.
- 5) Do the newly manufactured MLTS systems have the option of having this capability?  
 Not at this time.
- 6) What is the cost to include this capability in new systems?  
 Not Applicable
- 7) Is there a size limitation, i.e. number of stations, regarding whether "Attendant Notification" is incorporated into the system?  
 Not Applicable

System sizes range from 4 lines or trunks/ 8 stations to 80 lines or trunks/200 stations

Attendant notification of a call to 911 is a planned enhancement.  
It is expected that the Legend will work with an adjunct in the future.

Post-It™ Fax Note	7671	Date	# of pages ▶ 2
To	A/ALC BISES	From	A BERTAGALOUS
Co./Dept	FCC CCB	Co.	LUCENT TECH
Phone #	202 4182344	Phone #	908 953 7836
Fax #	202 4182345	Fax #	908 953 4906

## FEDERAL COMMUNICATIONS COMMISSION

APR 29 1997

CC Docket No. 94-102

Revision of the Commission's Rules to Ensure  
Compatibility with Enhanced 911 Emergency Calling SystemsRequest for Information from Concerned Parties Surrounding  
the Issue of "Attendant Notification"

April 16, 1997

Please note that the information we seek is intended to be relied upon for inclusion in the public record in CC Docket No. 94-102. We will ensure that your reply is included in the docket. You may fax your response to Anne Bisese at (202) 418-2345. Thank you for your cooperation. If you have any questions, you may call Anne Bisese at (202) 418-2344.

- 1) Does existing MLTS equipment have an "Attendant Notification" capability? If so, how do you define "Attendant Notification"? *Yes - Alarm indication on display, but not ext. #*
- 2) What is required to have this capability? *Software/Hardware?*
- 3) Are there different types of "Attendant Notification" systems? Please describe. *NO*
- 4) Can older MLTS systems be back fitted to include "Attendant Notification"? If so, is hardware or software or both required? How costly? *Yes, software required. Very costly to write, test, + retrofit the field.*
- 5) Do the newly manufactured MLTS systems have the option of having this capability? *Yes.*
- 6) What is the cost to include this capability in new systems? *Standard feature - no additional cost.*
- 7) Is there a size limitation, i.e. number of stations, regarding whether "Attendant Notification" is incorporated into a system? What do you consider a "small" MLTS? Please express in terms of lines and station capability. *NO - 4 x 8 is small.*
- 8) What is the smallest system that you manufacture that has internal "Attendant Notification" capability? *4x8*
- 9) What is the smallest system that you manufacture that does not have internal "Attendant Notification" capability but can support an external device that will give "Attendant Notification" capability? *?*
- 10) What percentage of your small MLTS customers request "Attendant Notification" capability? *?*
- 11) Do your owner/operator instructions include information on E-911? Do you think this would be helpful to your customers? *Yes; Yes.*

Please respond by fax by Monday morning, 21 April 1997 --- Thank you.

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