

Before the
FEDERAL COMMUNICATIONS COMMISSION

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Public Notice)	
)	
Additional Comment Sought)	
In Wireless Enhanced 911)	CC Docket No. 94-102
Reconsideration Proceeding)	
Regarding Rules and Schedules)	

ADDITIONAL COMMENTS OF SPRINT SPECTRUM L.P.

On September 25, 1997, the Personal Communications Industry Association ("PCIA"), the Cellular Telecommunications Industry Association ("CTIA"), the Association of Public Safety Communications Officials International, Inc. ("APCO"), the National Emergency Number Association ("NENA"), and the National Association of State Nine-One-One Administrators ("NASA") filed a joint letter addressing certain concerns raised by the Commission Order implementing enhanced 9-1-1 services (the "Joint Letter"). The Ad Hoc Alliance for Public Access to 911 (the "Alliance") filed objections to the Joint Letter which suggested that the public safety community and the wireless industry were misrepresenting the capabilities of wireless technology. Sprint Spectrum L.P., d/b/a Sprint PCS ("Sprint PCS") disagrees with the characterizations of the Alliance and submits the following comments in support of the Joint Letter.

Sprint Spectrum takes exception with the suggestion of the Alliance that it is the goal of the industry to block calls or to "thwart" the goal of providing access to emergency services to as many people as possible. The goal of the industry is to establish clear rules which are consistent with the current technologies used in wireless service.

The Joint Letter does not advocate that only successfully validated calls be processed or that carriers should not route all calls. Indeed, the recommended modification to Section 20.18(b) still permits the local 9-1-1 Authority to choose to receive all calls. The Joint Letter merely explains that without validation, the enhanced services to be provided pursuant to the Order may not be available. The 9-1-1 authority can still request the passage of all calls, however, these calls may not transmit an associated call back number. Moreover, the Joint Letter acknowledges that the architecture of certain systems will continue to route all calls. Sprint PCS is one such carrier whose system is currently structured to pass all calls and provide call back number for most of these calls. This does not mean, however, that Sprint PCS can provide enhanced services for all calls. Nor does it mean that other technologies and architectures will be able to pass all calls.

In addition, the implementation of number portability may force Sprint PCS to begin some limited validation process before a call back number can be provided. The Alliance maintains that number portability is not an issue for the industry because of the existence of a pseudo-ANI. The Alliance argument misconstrues the meaning of the term “pseudo-ANI.” Within the Sprint PCS CDMA system, a pseudo-ANI is a number assigned to a particular sector of a tower face which permits the system to identify the approximate location of the caller. Pseudo-ANI is not associated with a specific handset, it is merely a means of identifying a base station. Accordingly, the existence of a pseudo-ANI does not mean the existence of call back capability.

The Alliance is similarly incorrect in its interpretation of PSAP choice. The Commission properly noted in its Report and Order that “public safety organizations are,

in the final analysis, in the best position to determine whether acceptance of calls from handsets without code identification helps or hinders their efforts to preserve and promote health and safety in their communities.” Report and Order, ¶38. Sprint PCS agrees with this position and the Joint Letter properly leaves that decision in the hands of the 9-1-1 Authority. The public safety organizations, however, agree that such PSAP choice is not realistically possible until more accurate location technology is available.

Sprint PCS urges the Commission to adopt the recommendations of the Joint Letter. These recommendations do not promote call blocking but merely conform the Commission rules to the limitations of wireless technology. As noted in the Joint Letter, these modifications will not prevent carriers from routing all calls but merely acknowledge that certain types of validation may be required before call back capability can be achieved.

Respectfully submitted,



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