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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 9-1-1 Emergency Calling Systems	)))	CC Docket 94-102

REPLY COMMENTS
OF NENA, APCO AND NASNA

The National Emergency Number Association ("NENA"), the Association of Public-Safety Communications Officials-International, Inc. ("APCO") and the National Association of State Nine One One Administrators ("NASNA"), hereafter "Joint Commenters," respond to the comments of others submitted at the FCC's invitation of October 3, 1997, in the captioned proceeding.[1] A principal subject of the Commission's request for additional comment was the Joint Letter of September 25, 1997, sent to Chairman Hundt by representatives of the Cellular Telecommunications Industry Association ("CTIA"), the Personal Communications Industry Association ("PCIA") and the Joint Commenters.

The Joint Letter made specific recommendations on three subjects: Definition of Terms, Choosing the Type of Calls to be Processed and TTY Implementation. Beyond this, the letter was not intended to express conclusions. Instead, it urged the Commission to "refrain from making any decisions" about such controverted questions as callback capability to non-service-initialized phones. Despite the explicit limits of the Joint Letter, a number of wireless carrier commenters have chosen to castigate the Alliance for Public Access to 911 ("Alliance") for its views on such callback capability and have pronounced the record closed on the subject.

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1 Public Notice, DA 97-2751, 61 Fed.Reg. 53772, October 16, 1997.

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The Joint Commenters wish to dissociate ourselves from these industry conclusions, and to repeat what we understood to be the intended message of the September 25th letter: This callback issue and the others noted for deferral remain open for discussion and attempted consensus, with the Alliance and other interested parties.

Some clarification also is in order with respect to the scope of the TTY access deadline extension. PCIA and several other commenters appear to believe that the extension is to cover analog as well as digital wireless communications. That is not our understanding of the following paragraph from the Joint Letter:

> Second, we emphasize that although access to TTY/ TDD technology is currently available over analog systems, the industry continues to work with consumer groups and the Public Safety community on a digital solution and thus requiires an 18-month extension of the compliance date for implementation of 911 TTY services over digital wireless systems. (emphasis supplied)

Instead, we agree with TruePosition (Comments, February 17, 1997, 3) that "it disserves the public interest to concomitantly delay implementation . . . for consumers using TDD/TTY in an analog environment."

Respectfully submitted,

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October 27, 1997

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Copies of the foregoing Reply Comments of NENA, APCO and NASNA have been sent today, by hand or by mail, to the following:

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