

Ad Hoc Alliance for Public Access to 911

Alliance for Technology Access • Arizona Consumers League • National Consumers League • World Institute on Disability • National Emergency Number Association, California Chapter • Crime Victims United • Justice for Murder Victims • California Cellular Phone Owners Association • Florida Consumer Fraud Watch • Center for Public Interest Law • Consumer Action • Consumer Coalition of California • Consumers First • California Alliance for Consumer Protection • Californians Against Regulatory Excess • The Office of Communication of the United Church of Christ • Utility Consumer Action Network • Children's Advocacy Institute

RECEIVED

January 30, 1998

JAN 30 1998

EX PARTE OR LATE FILED
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

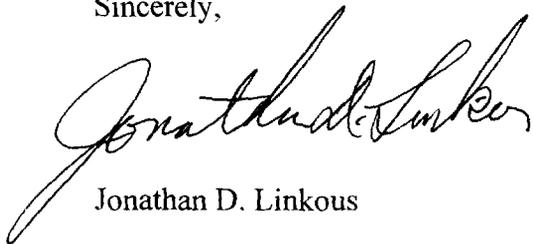
The Honorable William Kennard
Chairman
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Exparte Communication
Re: CC Docket No. 94-102
RM 8143

Dear Chairman Kennard:

Enclosed is a separate report of the Ad Hoc Alliance For Public Access to 911 prepared to accompany the report of the Wireless E-9-1-1 Implementation Ad Hoc ("WEIAD") report which was filed with the Commission today. The purpose of our separate report is communicate with the Commission our differences with the WEIAD report on two critical issues: establishing a Grade of Service requirement for wireless systems and implementing a strongest signal capability for cellular phones to help assure access to 9-1-1 emergency services.

Sincerely,



Jonathan D. Linkous

cc: The Honorable Susan Ness
The Honorable Michael Powell
The Honorable Harold Furchgott-Roth
The Honorable Gloria Tristani
Dan Phythyon, FCC Wireless Bureau
Magalie R. Salas, Secretary

No. of Copies rec'd
List ABCDE

0+1

RECEIVED

JAN 30 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with)	RM-8143
Enhanced 911 Emergency Calling)	
Systems)	

SEPARATE REPORT OF THE AD HOC ALLIANCE FOR PUBLIC ACCESS TO 911

The Commission requested that certain members of the wireless industry, public safety organizations and the Ad Hoc Alliance for Public Access to 911 ("Alliance"), representing consumer organizations, meet and discuss several issues and report the results of their discussions to the Commission. The wireless industry and public safety representatives thereafter met and formed a working group they called the Wireless E 91-1 Implementation Ad Hoc ("WEIAD") to address these issues and report to the Commission. The Alliance was invited to attend the second meeting of the WEIAD in Baltimore, Maryland on November 5 - 6, 1997. The Alliance also participated in the third meeting in Phoenix, Arizona on January 8 - 9, 1998. The results of these meetings have been reduced to a joint report submitted to the Commission.

This separate report by the Alliance is based on the premise that the Commission expected the parties to develop information and recommendations which would be of assistance to the Commission. As the joint report shows, no information or recommendations resulted from the group discussions concerning grade of service for 911 calls. The joint report also reflects a stalemate with respect to the Alliance's proposal that the strongest available channel of communication be automatically selected whenever 911 is dialed. The Alliance believes that

immediate Commission action is now required in both of these areas of concern for the following reasons:

I. GRADE OF SERVICE

The Alliance recommends that the Commission establish a P.01 grade of service standard for the analog channels of cellular systems and require cellular carriers to file annual reports showing the grade of service provided and a listing of the known failed attempts to reach 911 over their systems.

A. The refusal of the wireless industry to produce information concerning the grade of service for emergency calls justifies an inference that such information would be adverse to their position that "all is well".

The Alliance rejects the wireless industry's proposition that the Commission should focus only on the wireline telephone network side of the mobile switch in connection with the placement of 911 calls. All of the evidence presented to the parties thus far indicates that the landline telephone companies have promptly moved to upgrade their networks to provide a P.01 grade of service for 911 calls. On the other hand, no information has been presented to the WEIAD concerning the grade of service provided on the wireless side of the mobile switch. The Alliance does not accept the contention that the present grade of service on the wireless side is unknown to the wireless carriers. The Alliance is informed and believes that data showing when a cell is fully loaded and unable to handle more calls, is collected at the wireless switch for use by the cellular carriers in planning for the expansion of their systems. The Alliance repeatedly requested this information from the wireless industry during the course of our discussions but

such information was not produced.¹

B. The limited data available suggests that the grade of service for emergency calls is unacceptable.

The Alliance has come into possession of a five (5) year old drive study of the Los Angeles area cellular systems which established a grade of service of P.21 for one cellular carrier and P.47 for the other carrier.² As a very limited spot check, the Alliance recently placed 100³ calls in Los Angeles, over the analog channels of both cellular systems, at a location where there was maximum signal strength from both carriers, for a period of one hour starting at 4:55 p.m. (The area was selected because the commercial development in the area makes it apparent that there are no zoning or other governmental restrictions which would serve to limit the number of cell sites that the carriers could construct in the area. Of course, the carriers could always utilize microcells and/or other available technologies such as superconducting filters, to enhance their coverage in this area, if there were such restrictions or other limitations on the number of “full-fledged” cell sites that could be constructed in this area). This check indicated a grade of service of P.02 for one carrier and P.12 for the other carrier on their analog channels. The Alliance has been informed and believes that there are other areas in the country where the grade of service over the analog channels of cellular systems is P.30 or worse. This information is submitted, not

¹ See Attachment 1.

² See Attachment 2. It should be noted that the Commission initially gave cell carriers 5 years to build out their systems. At the time of the drive study, some 10 years had passed.

³ 50 calls were placed over the analog channels of each carrier’s cellular system from a single location near 4th and La Brea.

to prove a grade of service, but to show that there is significant cause at the present time for the Commission to require the wireless carriers to produce such grade of service information for the Commission and the public to review.

C. The Commission cannot rely on market incentives to ensure an acceptable grade of service for 911 calls.

The Alliance also rejects the proposition that market incentives are adequate to ensure an acceptable grade of service for all calls, including 911 calls. The current market incentive on the part of the cellular carriers is to migrate wireless users from the analog portion to the digital side of their cellular systems, because this migration will enable the carriers to add more subscribers to their systems and/or reduce capacity problems. Notwithstanding this strong incentive, the cellular carriers are at the same time very eager to dispose of, and have been disposing of the large number of analog cell phones which are currently in the cellular carriers inventory. (It should be emphasized that most cell phones are purchased by the cellular carriers directly from the manufacturers and then discounted to retail outlets to sell as part of a package to secure customers for a particular wireless system). In order to liquidate this large inventory of analog phones, these phone are being sold at reduced prices and/or given away “free” to new customers (and, in certain cases to existing customers as well), commonly with the proviso that these customers agree to subscribe for cellular service for a minimum period of time from the cellular carrier in question. Thus, more analog cell phones are being added to cellular systems by cellular carriers who are, at the same time, reducing the number of analog channels available to the public by redeploying those channels to digital use.

D. It is reasonable to assume that almost all calls to 911 from cell phones will be placed over the analog channels of each cellular system.

It is well documented that the majority of wireless phones are purchased by consumers for "safety and security" purposes. A recent survey shows a mere 13% of wireless phones are purchased for business purposes.⁴ It is reasonable to assume that because the dual mode (digital/analog) cell phones are more expensive, they are more likely to be purchased by business users. This same survey shows that 55% of the respondents are concerned about the availability of location technology in emergency situations. The Alliance is informed and believes that all of the present location technologies now being deployed work only on the analog, not the digital channels of cellular systems. Thus, it is reasonable to assume that 911 calls placed over dual mode phones will be shunted to the analog mode in order to be placed. Therefore, for the foreseeable future, most, if not all, 911 cellular calls can be expected to be placed over the analog channels of cellular systems only, which have become few in number in comparison with the number of available digital channels, as carriers build out their digital cellular systems.

E. Past and present blocking practices show an antipathy towards emergency calls by some cellular carriers.

As the Commission knows, market incentives previously operated to cause some cellular carriers to block calls to 9-1-1 from non-subscribers to their systems. The Commission recently moved to end this deplorable practice. However, the Alliance has recently discovered that some cellular carriers are now blocking emergency calls made to "1-911", "*-911" and "#-911".⁵

⁴ See Attachment 3.

⁵ Specifically, Bell South in Atlanta and GTE in Tampa.

These calls reflect customer confusion because they are instructed to dial "1" when roaming, or in some systems to dial "*" or "#" when making an emergency call. There is no technical reason to block these calls -- and many carriers do not block them. Since carriers regularly study the reasons for failed calls, it can be assumed that they know of this problem, but have chosen not to take corrective action. (This problem is still being studied by the Alliance).

F. Conclusion.

Analog channels of cellular systems will continue to handle almost all of the calls to 911 placed from cell phones. Market practices and incentives, past and present 911 blocking practices, and limited test data, all give rise to valid concerns about the present and future grade of service for 911 calls placed over cellular systems. It is fair to assume that the wireless carriers have refused to produce information about their grade of service for emergency calls during the WEIAD discussions because that information will be adverse to their position that "all is well". Various statements from members and/or representatives of the wireless industry given in the context of Docket 94-102 to the effect that "there is no evidence" or "it is not possible" have been shown to be false by the Alliance, at a cost to the Alliance that need not and should not have been incurred because the actual data demonstrating the true facts has been in the possession of the industry all along. There should be no presumption in favor of the wireless industry and no shifting of the burden of proof to public safety or consumer groups with respect to these matters, especially when the information required to analyze the problems associated with the placement of 911 cellular calls is readily available to the wireless carriers. "Sunshine is the best disinfectant"; thus it should be incumbent on the wireless industry to produce hard data, not mere contentions, when issues of public safety are under consideration.

Today, 911 calls are handled the same way as all calls placed over the analog channels of cellular systems. Therefore, the Alliance respectfully recommends that the Commission establish a P.01 grade of service for the analog portion of all cellular systems and require all cellular carriers to file annual reports detailing when and where a P.01 grade of service is not achieved and for how long. (The Alliance believes that all wireless carriers should be placed on notice that a P.01 grade of service standard will be imposed on all cellular systems within a reasonable period of time). The Alliance further recommends that the Commission require all wireless carriers to submit annual reports listing the number of known failed attempts to contact 911 and, if possible, the reasons for such failures.

II. THE ALLIANCE'S STRONGEST SIGNAL PROPOSAL

The joint report reflects agreement with respect to some aspects of the Alliance's strongest signal proposal but an impasse with respect to the further action required. The parties agree that the technical obstacles incident to the use of the strongest signal for various digital formats will not be quickly solved. For the reasons set forth in the above discussion concerning grade of service, the Alliance believes that most of the calls to 911 will be shunted to the cellular analog channels. Therefore, the Alliance has agreed to limited its strongest signal proposal to cellular phones operating in the analog mode. The Alliance has also agreed that the consumer should be able to disable the strongest signal feature.

The Alliance believes that the original objective of the Commission to enable a call to 911 to be placed over any wireless system from any wireless phone should be pursued. As technology develops, we expect that this objective will be achieved. That does not mean that the

Commission should wait for a “better” solution to a problem that is presently resulting in injury and loss of life. Two solutions have been proposed. Both should be adopted without delay.

A. The wireless industry proposal

There are two cellular systems operating across the country. These systems are generally called system “A” and system “B”. The wireless industry proposal is based on changing the system selection criteria in the cellular hand set to the “preferred” mode. There are five modes currently in use, i.e., “A” only, “B” only, “A” preferred, “B” preferred, and Home only. For competitive reasons, most cellular phones are programmed at the time of sale to operate only over one cellular system, i.e. “A” or “B” only. Some cellular phones are programmed to work over only a single system in a particular city, i.e. Home only.

The wireless industry has proposed that CTIA/PCIA undertake a public information campaign to educate users how to reprogram their handsets from the “only” to the “preferred” mode. CTIA/PCIA also proposes to ask manufacturers and wireless carriers to eliminate the use of the “only” mode of programming. The Alliance believes that the voluntary surrender of an ingrained competitive practice is problematic but that such effort should be encouraged. It must be emphasized that this proposal only addresses the situation where there is *no signal* from the “preferred” cellular carrier.

B. The Alliance’s proposal

It is agreed that vehicular mounted cellular phones are approximately five (5) times more powerful than hand held cellular phones. Thus, there are significant areas where the vehicular

cellular phone can communicate with the cell site but the hand held unit cannot. These areas have been called “holes” by the Alliance. Due to the inherent design of the cellular system, a hand held cellular phone will not switch from its “preferred” system to the other system as long as there is any signal from the preferred carrier *even though no communication is possible*. What the calling party hears in such a situation is “dead air,” i.e. nothing.

The Alliance first documented these low signal “holes” several years ago. The Alliance found that, in most instances, the hole in one cellular system was filled in by the strong signal from the other cellular system.⁶ The Alliance also ran tests which concluded that both Marcia Spielholtz and the Lechuga family⁷ were in such low signal holes when they tried to reach 911 over their hand held cellular phones. These same tests show that there was sufficient signal from the other cellular carrier in these holes to enable these 911 calls to have been completed. If the Alliance’s proposed strongest signal solution had been available in these instances it is safe to say that both Spielholtz and Lechuga would have reached 911!

C. Conclusion

Attachment 4 consists of a table outlining the areas of disagreement between the

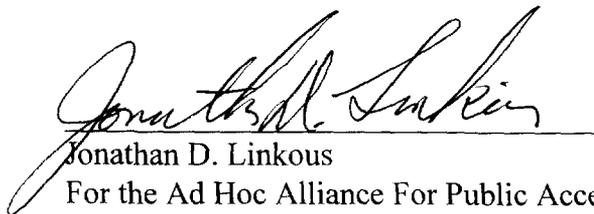
⁶The Alliance believes that the fact that cells are usually on different sites is the result of efforts by cellular companies to obtain exclusive sites and, thus, a competitive advantage.

⁷ Marcia Spielholtz was shot in the face after being chased by car jackers for approximately 10 minutes. She repeatedly dialed 911 over her hand held cellular phone but the call was not completed. The Lechuga’s vehicle hit a patch of ice and skidded off of the road. Five calls were attempted over a hand held cellular phone. None were connected. Two small children froze to death and Mrs. Lechuga either was frozen to death or was killed by wild animals.

Alliance and the wireless industry concerning the strongest signal proposal. Attachment 5 is a copy of a report from the Trott Group, an independent engineering firm retained by the Alliance, to evaluate these issues. This report concludes:

“There have been no technical issues raised surrounding the *Alliance's* "strongest signal" proposal that justify further delay. Further discussions and continuing the “what if’s” are unlikely to produce anything productive. The goal is to take advantage of the fact that where the “A” carrier has a coverage hole, the “B” carrier usually fills the hole, and likewise, where the “B” carrier has a coverage hole, the “A” carrier usually fills the hole. Taking advantage of this fact is no longer a technical issue, it is a policy issue for the FCC to decide” (emphasis added)

Over two years have past since the Alliance first made its strongest signal proposal. Some 28 million cellular phones have been sold to the public since that date. The Alliance strongly urges the Commission to adopt this life saving proposal without delay. If, as technology evolves, a better solution presents itself then it should be adopted. **Waiting a year of more to see if a better solution emerges is clearly not in the public interest and continues to put lives at risk.**


Jonathan D. Linkous
For the Ad Hoc Alliance For Public Access to 911

RECEIVED

JAN 30 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ATTACHMENT 1

Submitted: November 11, 1997

Questions for Industry:

1. What percentage of the 38,000+ cell sites now deployed in the U.S. have more than 6db difference in measured signal strength between their control and voice channels?
2. What percentage of 9-1-1 call originations using the Alliance proposed Strongest Compatible Signal (SCS) algorithm will result in being assigned a weaker voice channel than that which would be obtained using the existing EIA/TIA-553 algorithm? Why will this occur?
3. What percentage of the 38,000+ cell sites now deployed in the U.S. provide "Portable Grade Coverage" (-95dbm minimum signal level on the street) signal quality throughout their coverage area?
4. What percentage of each Metropolitan Statistical Area (MSA) and Rural Statistical Area (RSA), by carrier, fails to meet the Portable Grade Coverage (-95dbm minimum signal level on the street) signal quality?
5. What is the Busy Hour Call Blockage Ratio (i.e. PO2, PO3, etc.) for the ten busiest cells in each of the top thirty markets, by carrier? (During the business day, i.e. "Peak" and during nights and weekends, i.e. "Non-Peak")
6. What percentage of call connect time (voice channel occupancy) do phones in the top thirty markets experience Carrier to Interference ratios worse than 17db?
7. How many Temporary Directory Numbers (or equivalent) are being maintained in each Mobile Telephone Switching Office (MTSO) in each of the top one hundred markets, by carrier?

ATTACHMENT 2

LA Cellular

System Performance Test

A/B Comparison

September, 1993

Performed by:

COMARCO

A/B Comparison

SST Configuration

SST 1: LA Cellular
0.6 watt

SST 2: LA Cellular
3 watt

SST 3: B Carrier
3 watt

SST 4: B Carrier
0.6 watt

COMARCO QUALITY INDEX

Sep-93
ALL AREAS / 0.6 WATT

LA CELLULAR

B CARRIER

TOTAL CALLS ATTEMPTED

1527

1839

TOTAL TIME ONLINE

1806.10 min.

1569.17 min.

ACCESS QUALITY MEASUREMENT

MEAN ACCESS TIME	8.43 sec.		9.47 sec.	
NORMALLY TERMINATED	1207	79.0%	1054	57.3%
REORDERS	98	6.3%	171	9.3%
FAST BUSY	1	0.1%	280	15.2%
NO SERVICE	223	14.6%	334	18.2%

ONLINE QUALITY MEASUREMENT

DROPPED CALLS	81	2.69 /hr.	73	2.79 /hr.
---------------	----	-----------	----	-----------

UPLINK AUDIO NOISE

VERY GOOD (<-80 dBm)	88.89%	89.37%
GOOD (-80 to -50 dBm)	7.52%	6.83%
FAIR (-50 to -40 dBm)	1.86%	1.58%
POOR (-40 to -30 dBm)	1.22%	1.45%
VERY POOR (>-30 dBm)	0.50%	0.78%

DOWNLINK AUDIO NOISE

VERY GOOD (<-80 dBm)	81.17%	79.69%
GOOD (-80 to -50 dBm)	11.18%	14.01%
FAIR (-50 to -40 dBm)	3.82%	3.06%
POOR (-40 to -30 dBm)	2.25%	1.71%
VERY POOR (>-30 dBm)	1.59%	1.52%

WEIGHTED QUALITY SCORE:

24.60

-23.03

COMARCO QUALITY INDEX

Sep-93
ALL AREAS / 3 WATT

LA CELLULAR

B CARRIER

TOTAL CALLS ATTEMPTED
TOTAL TIME ONLINE

1527
1804.52 min.

1824
1590.50 min.

ACCESS QUALITY MEASUREMENT

	LA CELLULAR	B CARRIER
MEAN ACCESS TIME	8.39 sec.	9.40 sec.
NORMALLY TERMINATED	1209 79.2%	1075 58.9%
REORDERS	73 4.8%	126 6.9%
FAST BUSY	2 0.1%	284 15.6%
NO SERVICE	243 15.9%	339 18.6%

ONLINE QUALITY MEASUREMENT

	LA CELLULAR	B CARRIER
DROPPED CALLS	84 2.79 /hr.	39 1.47 /hr.

UPLINK AUDIO NOISE

Category	LA CELLULAR	B CARRIER
VERY GOOD (<-60 dBm)	79.96%	90.42%
GOOD (-60 to -50 dBm)	17.44%	6.65%
FAIR (-50 to -40 dBm)	1.71%	1.34%
POOR (-40 to -30 dBm)	0.59%	1.08%
VERY POOR (>-30 dBm)	0.31%	0.50%

DOWNLINK AUDIO NOISE

Category	LA CELLULAR	B CARRIER
VERY GOOD (<-60 dBm)	78.84%	75.06%
GOOD (-60 to -50 dBm)	12.73%	16.33%
FAIR (-50 to -40 dBm)	4.19%	4.12%
POOR (-40 to -30 dBm)	2.29%	2.09%
VERY POOR (>-30 dBm)	1.95%	2.40%

WEIGHTED QUALITY SCORE:

22.72

-14.54

LA STATS: OVERALL

Overall High Level Call Data

SST NUMBER:	1	2	3	4
1 Normal	1139	1140	1010	988
2 Ans Term	39	28	36	50
3 Dropped	81	84	39	73
4 Reorder	96	73	126	171
5 Fast Busy	1	2	284	280
6 No Service	223	243	339	334
7 Busy	21	19	39	35
8 Connect Timeout	48	58	177	166
9 Max Retries	0	0	0	0
10 Stimulator	68	69	65	66
11 Voice Channel	0	0	0	0
90 NVC-Incomplete	0	0	0	0
91 WVC-Incomplete	0	0	0	0
99 Invalid	0	0	0	0
TOTAL:	1716	1716	2115	2163

Overall Low Level Call Data

SST NUMBER:	1	2	3	4
Sat Flips:	5	8	7	5
Home Carrier:	A	A	B	B
Home System Attemp	1385	1355	1148	1183
Roaming System A:	108	118	506	490
Roaming System B:	0	0	122	156
No Service attempts:	223	243	339	334
Total attempts:	1716	1716	2115	2163
Access counts:	1264	1250	1112	1121
ACCESS TIMING IN SECONDS				
Lowest:	6.25	6.3	7.12	7.18
Mean:	8.43	8.39	9.4	9.47
Highest:	18.63	16.91	20.55	18.34
Std. Dev.:	1.04	1.05	1.51	1.53
Mean RSSI (CTRL):	-87.6	-85.2	-90.5	-91.5
Mean RSSI (VOICE):	-77.5	-77.6	-77	-76.7
Percent of time VOICE channel < -100.0 dBm	6.4	6.6	7.9	7.2

ADJACENT CHANNEL STATISTICS (dB)

Mean ratio (C-1):	24.1	24.1	27.5	27.9
Mean ratio (C+1):	27.9	27.9	27.3	27.4

PERCENT OF TIME ADJACENT CHANNEL RATIO < 18.0 dB

Ratio (C-1):	22.6	22.9	16.4	15.9
Ratio (C+1):	14.6	14.2	15.5	15.2

Overall Noise Measured by Mobile System

High dBm Low dBm	SST 1	SST 2	SST 3	SST 4
0.0 to -10.0:	11	11	30	8
-10.0 to -20.0:	314	651	707	400
-20.0 to -30.0:	1395	1446	1556	1025
-30.0 to -40.0:	2440	2483	1994	1611
-40.0 to -50.0:	4135	4532	3930	2881
-50.0 to -60.0:	12110	13786	15581	13193
-60.0 to -70.0:	87958	85343	71630	75030

LA STATS: OVERALL

Outside ranges:	3	19	2	2
TOTAL:	108363	108252	95428	94148
Overall Noise Measured by Answer System				
High dBm Low dBm	SST 1	SST 2	SST 3	SST 4
0.0 to -10.0:	0	0	18	14
-10.0 to -20.0:	88	50	49	91
-20.0 to -30.0:	459	282	408	609
-30.0 to -40.0:	1325	634	1028	1358
-40.0 to -50.0:	2008	1848	1273	1490
-50.0 to -60.0:	8141	18872	8314	6397
-60.0 to -70.0:	96179	86510	85791	83689
Outside ranges:	0	0	5	36
TOTAL:	108198	108194	94881	93648

ATTACHMENT 3



**PUBLIC OPINION
STRATEGIES**

The following questions were abstracted from an August 1997 survey on wireless safety issues.

Methodology

Public Opinion Strategies recently completed a national poll of 800 wireless telephone users or people who considered buying a wireless telephone in the past year. The poll was completed on July 31-August 3, 1997, and has a margin of error of $\pm 3.46\%$, in 95 out of 100 cases. This means that if this survey were replicated, the results would be within about three percentage points 95% of the time. Seventy percent of the respondents were people who are current subscribers, while 30% were individuals who over the past year have considered buying a wireless phone.

1. Now, I would like to read you some reasons people might own cellular phones, and please tell me which one is, in your own opinion, the best reason to own a cellular telephone...(RANDOMIZE)

13% TO HELP IN BUSINESS
40% IN CASE THE CAR BREAKS DOWN ON THE HIGHWAY
23% IN CASE OF A MEDICAL EMERGENCY
3% TO REPORT CRIMES, DRUNK DRIVERS, OR TRAFFIC PATTERNS TO THE POLICE
17% TO STAY IN TOUCH WITH YOUR FAMILY
3% DON'T KNOW (DO NOT READ)
2% REFUSED (DO NOT READ)

2. Nearly one-third of all calls to emergency 911 are on cellular phones. However, because there is no cellular location technology, it takes longer to find someone's location and help them. It has been estimated that 3,000 lives per year could be saved if rescue time is cut by nine minutes. However, the location technology to do that will cost cellular phone users about one dollar a month. If an elected official played an active role in getting cellular location technology installed faster, would you be more likely or less likely to vote for that candidate in the next election?

55% MORE LIKELY
9% LESS LIKELY
32% NO DIFFERENCE (DO NOT READ)
4% DON'T KNOW (DO NOT READ)
1% REFUSED (DO NOT READ)

ATTACHMENT 4

Position of the Wireless Industry v. the Alliance. The following table summarizes the current positions of the parties:

ISSUE	WIRELESS INDUSTRY	ALLIANCE
Who should decide?	The Wireless Industry Standard Setting Board	The Federal Communications Commission (FCC).
Who should have the burden of proof?	The Alliance should propose a specific technical protocol, build a prototype, and test at 100 locations.	On <i>June 12, 1996</i> the FCC concluded that the Alliance had made a prima facie case for its proposal and held that “[i]f a commenter believes that Alliance’s [strongest signal] proposal is technically infeasible, it should provide its reasons in detail, with supporting engineering analysis”. <i>No such reasons or analysis have ever been filed or provided.</i>
What is an appropriate solution under the circumstances?	The wireless industry should be encouraged to voluntarily stop its practice of “A” and “B” only restrictions and asked to program all cell phones as “A” or “B” preferred.	The voluntary surrender of an ingrained competitive practice is problematic. This solution would not have helped Spielholtz or Lechuga or others similarly situated in the future. The Alliance proposal would have made a difference to both Spielholtz and Lechuga and this solution involves a trivial software change in the hand set. The public should have access to the best available channel of communications every time 911 is dialed.

ISSUE	WIRELESS INDUSTRY	ALLIANCE
<p>What is the true issue?</p>	<p>The wireless industry does not want any mandates from the FCC and believes that these problems will be solved in the "marketplace".</p>	<p>The market place incentives lead the wireless industry to block 911 calls from non-subscribers until the FCC recently prevented this atrocious practice. Some cell companies are presently blocking calls to "1-911, *-911 and #-911 -- others are not. The wireless industry is using the fact that there are holes in 911 coverage to argue that local governmental agencies must relax zoning restrictions concerning cell sites. The strongest signal solution mitigates against their argument thus is not in the commercial interest of the wireless industry. FCC action is required by the public interest.</p>