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Robert R. Cohen

EX PARTE OR LATE FILED

May 7, 1998

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20541

Re: *Ex Parte* Presentation
CC Docket No. 94-102

Dear Ms. Salas:

On May 7, 1998, George Heinrichs of SCC Communications Corporation and the undersigned met with Paul Misener, Senior Legal Advisor, Office of Commissioner Furchtgott-Roth, regarding issues in the above-referenced proceeding. A copy of the position paper that was distributed at the meeting is attached.

During the meeting we discussed SCC's opposition to the strongest signal proposal advocated by the Ad Hoc Alliance and support for liability protection for wireless carriers and 9-1-1 service providers. Additionally, we discussed the costs and legal issues associated with providing 9-1-1 services to non-subscribers.

An original and one copy of this filing are being submitted for inclusion in the record of this proceeding. A copy of this filing is also being sent to Mr. Misener.

Respectfully submitted,



Robert R. Cohen
Counsel for SCC Communications Corp.

cc: Paul Misener, Esq.

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May 1998
CC Docket No. 94-102

- SCC is the largest 9-1-1 services and technology company in North America.
- We have expanded from a two-person start-up to a company that employs over 270 people.
- While enhanced 9-1-1 is commonplace on the wireline side, it is currently in its infancy on the wireless side.
- However, wireless E9-1-1 will not “just happen” because the FCC has ordered it.

We can identify a number of challenges to implementation:

- Public Safety Answering Points (PSAPs) will need to make technological upgrades so they can take maximum advantage of these new services;
- government and industry need to work together to develop cost recovery mechanisms for wireless carriers;
- wireless carriers and E9-1-1 service providers must be allowed to operate under the same 9-1-1 liability standards that apply to wireline carriers and their 9-1-1 service providers; and
- wireless carriers need to be able to build out their networks so they can provide seamless coverage.