

DOCKET FILE COPY ORIGINAL



Building The  
Wireless Future.

EX PARTE OR LATE FILED  
May 18, 1998

**CTIA**

Cellular  
Telecommunications  
Industry Association  
1250 Connecticut  
Avenue, N.W.  
Suite 200  
Washington, D.C. 20036  
202-785-0081 Telephone  
202-785-0721 Fax

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

RECEIVED

MAY 18 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation  
CC Docket # 96-115 (Telecommunications  
Carriers' Use of Customer Proprietary Network  
Information and Other Customer Information)  
CC Docket # 94-102 (E911 - Strongest Signal)

Dear Ms. Salas:

On Monday, May 18, 1998, the Cellular Telecommunications Industry Association ("CTIA"), represented by Brian Fontes, Michael Altschul, Randall Coleman and Art Prest, met with Commissioner Michael Powell and Peter Tenhula, Legal Advisor, Commissioner Powell's Office, regarding the above-referenced proceedings. The parties discussed CTIA's submission to the FCC in the matter of Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, as well as CTIA's position on the Strongest Signal proposal, in conjunction with the attached material.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and its attachment are being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Cleveland Lawrence III



## “Strongest Signal” Proposal CC Docket 94-102



Each day, nearly 83,000 wireless calls are successfully completed to 9-1-1 and other emergency numbers. Wireless users rely on wireless carriers to complete these calls, and the wireless industry is committed to the best solutions to insuring that emergency calls get through to the appropriate Public Safety Answering Point.

CTIA opposes the “Strongest Signal” proposal - *which we understand to be the strongest forward control channel (i.e., from the cell site to the mobile) which implies - but in fact is independent of -- the automatic assignment of the best voice channel from the mobile to the cell site for analog-only cellular phones when “9-1-1” calls are attempted* - because it will reduce the reliability of wireless networks and do more harm than good.

- **Does Not Ensure Best Voice Channel.** Use of the strongest forward control channel does not increase the probability of the mobile being assigned the strongest available voice channel.
- **Diminution of the Benefits of “Enhanced” 9-1-1 Service.** The serving switch must be able to validate the wireless customer to provide the PSAP with the call-back information that provides the predicate for this proceeding. Since the “Strongest Signal” proposal will route calls randomly, half of all calls from “strongest signal” units will not be handled by the customer’s wireless carrier, and therefore will not be validated by the serving switch. The Public Safety community petitioned the Commission to adopt rules that would extend enhanced 9-1-1 capabilities to all wireless users.
- **Increased Call Set-Up Time.** Handset manufacturers will have to redesign wireless phones to screen dialed digits before placing a call in order to identify 9-1-1 calls and initiate the scan of both bands seeking the strongest signal. Because the need to scan both bands, the normal call set up times will be doubled or tripled, causing users, particularly in an emergency situation, to hang up and redial, over and over again.
- **Increased Likelihood of Blockage.** The “Strongest Signal” proposal is more likely to result in fewer, not more, successfully completed calls. Think of a four lane highway -- why would the State Highway Commissioner deliberately block two of the lanes to emergency vehicles. It is much better to use both carriers’ networks to deliver 9-1-1 calls.
- **Removes Incentives for Carriers to Deploy Advanced Location Features.** The “Strongest Signal” proposal removes the incentive for wireless carriers to deploy advanced 9-1-1 location technologies as a way of differentiating themselves in the market, since customers could not be certain that any one 9-1-1 call would be handled by his/her chosen carrier.

**TIA Should Address This Issue.** The “Strongest Signal” proposal, while superficially simple, will trigger many consequences, not all intended, on wireless carriers’ ability to complete emergency calls. TIA is the most appropriate forum to resolve these issues.