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May 20, 1998

Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC Docket 94-102, wireless E9-1-1

Dear Madame Secretary:

Pursuant to Section 1.1206 of the Rules, this gives notice of meetings today with the persons listed as receiving copies of this letter. In the meetings as representatives of public safety communications organizations, including the National Emergency Number Association ("NENA") and the Association of Public-Safety Communications Officials-International, Inc. ("APCO") were:

Dr. Bill Munn, NENA President and Executive Director of the Tarrant County, Texas 9-1-1 District;

Jack Keating, rising President of APCO and Communications Director for West Covina, California;

John Melcher, Director, Management Information Systems, Greater Harris County (Houston), Texas 9-1-1 District;

Bob Gurss, Counsel for APCO;

and the undersigned, as Counsel for NENA.

We discussed the points mentioned on the enclosed pages under the general headings of "strongest signal;" wireless-wireline interconnection for E9-1-1 purposes; and Phase II accuracy measurements.

Please direct any questions to the undersigned.

Sincerely,

James R. Hobson

cc: Commissioner Ness, Karen Gulick, Paul Misener, Peter Tenhula; John Cimko and staff.

Public Safety Points
May 20, 1998
NENA * APCO * NASNA

Strongest Signal

1. Response to Alliance engineering firm, Trott, filed 2/23/98

    a. Offered to meet with Trott.

    b. Alliance asked Trott to call.

    c. No contact with Public Safety from Trott.

2. Three concerns in Public Safety response of 2/23/98:

    a. Automatic invocation of strongest control channel would reduce choices from two carriers to one in areas where one carrier predominates. In cases of mass calling ("good Samaritan" syndrome), the concentration of calls on one carrier would affect entire broader area served by common MTSO.

    b. What if strongest control channel carrier has inferior location capability, or none at all? This forces caller onto service where he cannot be located. *Consequence*: Disincentive to add or improve radiolocation. [In fact, contrary incentive is to "turn down" control channel strength, let stronger competitor take all 9-1-1 calls.]

    c. Public safety would rather receive a call on an adequate voice channel -- with location -- than a call that might be better than adequate but without location.

3. There is an alternative: A/B or B/A, meaning switch to alternate carrier when preferred offers poor or no signal.

4. We see strongest signal as requiring standards change to scan all control channels on A and B systems. The same standards body can decide merits of proposal.

Wireless-Wireline Interconnection

1. In 2/17/98 Petition for Reconsideration in CC Docket 94-102, CTIA asks FCC to declare that in event of negotiation impasse, carrier gets to choose transmission technology.

2. Public Safety opposed because:

   a. It is responsible for overall reliability of wireless/wireline/ PSAP system.

   b. Public money is asked in payment.

   c. Need freedom to accommodate multiple carrier needs.

3. Our request: Don't load the dice in negotiations by answering CTIA's request. Force parties to keep bargaining.

Phase II Accuracy

1. Public Safety, CTIA and PCIA have disclaimed any intent to change Phase II location accuracy target of 125 meters RMS.

2. RMS is a statistical technique that recognizes some location points will be wide "out-lyers" well beyond 125 meters.

3. In 3/20 and 4/6/98 ex parte filing, Ericsson claims FCC has changed the standard by interpretation from the July 1996 order to the December 1997 reconsideration order.

4. We disagree. The standard remains as it was. "67%" was always read (except by Ericsson) as an approximation of RMS -- fully explained in attachments to the Consensus Agreement filed 2/96.

5. Ericsson has vastly increased the out-lyer effect by plugging in large cell radiuses under the Phase I "fallback" location if Phase II data fails. That is not necessarily demanded by the Phase II rule.

6. We are working with the industry to look into Ericsson's problem. We ask for no change in the Phase II accuracy standard until the problem has been worked thoroughly.