

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Petition by Joint Petitions to Ensure)
Interoperability of 911 Emergency) RM-9343
Calling Systems)
)

COMMENTS OF MCI WORLDCOM, INC.

MCI WorldCom, Inc. ("MCI WorldCom"), by its attorneys, submits these comments on the Public Notice¹ released by the Common Carrier Bureau (the "Bureau") requesting comment on the petition, filed by the Texas Advisory Commission on State Emergency Communications and other public safety providers ("Texas Petitioners"),² seeking to ensure interoperability of emergency 911 services.

INTRODUCTION

The Texas Petitioners have asked the Commission to open an investigation into the interoperability of 911 network facilities and customer premises equipment ("CPE"), indicating that the "actual implementation of solutions to 911 interoperability issues has still been slower than wanted or needed by some 911 entities, and thus does not optimally enhance public safety."³ In particular, the Texas Petitioners suggest that there is insufficient information currently available to accurately determine the scope of the 911 interoperability difficulties, and that there

¹ *Petition By Joint Petitions to Ensure Interoperability of 911 Emergency Calling Systems*, Public Notice, DA 98-1652, RM9-9343 (Comm. Carr. Bur. rel. August 18, 1998)("Notice").

² Petitioners include the Texas Advisory Commission on State Emergency Communications, the Greater Harris County 911 Emergency Network, Tarrant County 911, Denton County 911, Bexar County 911, and the National Association of State Nine-One-One Administrators.

³Petition at 2.

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is consequently no common understanding as to the actual extent and impact of nationwide interoperability issues.”⁴

MCI WorldCom concurs with the Texas Petitioners that 911 is a crucial service provided by the telecommunications industry, and that interoperability problems affecting 911 should be identified and resolved as quickly and efficiently as possible. The Commission already has an open proceeding examining 911 CPE issues. The Commission should thus commence an investigation to determine whether in fact there are potential 911 network interoperability issues, using the resources of a technical advisory committee, and if so what industry standards activities may be necessary to restore 911 to full functionality. MCI WorldCom would be pleased to participate in this important public safety effort and to serve on any technical committee formed by the Commission.

DISCUSSION

MCI WorldCom agrees with the Texas Petitioners that the Commission should choose an investigative procedure that will allow 911 interoperability issues to be sufficiently evaluated and resolved in the quickest manner. The Texas Petitioners are also correct in proposing that the Commission should “document the extent of 911 interoperability issues and any resulting problems from lack of interoperability.” Petition at 2. The proper functioning of 911 service in a competitive, multi-provider local exchange environment is of key importance in order to preserve the key public safety benefits of 911.

MCI WorldCom believes that the best way to approach these issues is for the Commission to appoint a technical advisory committee under the Federal Advisory Committee Act, modeled after the North American Numbering Council, to examine the nature, scope and potential

⁴ Petition at 1-2. Other factors that the Texas Petitioners suggest might impede 911 interoperability include switching, wireless 911 location and local NPA relief problems. Petition at 2.

solutions to 911 interoperability issues. In this way, the Commission can delegate the fact-finding functions to technical experts and retain oversight for purposes of promulgating regulations, if necessary, to resolve policy or legal arising that may be impeding 911 interoperability. To this extent, we agree with the Texas Petitioners that the Commission should choose “the investigative procedure that will allow these issues to be sufficiently evaluated in the quickest manner,” Petition at 7, such as what they term a “joint experts meeting.” Id.

The Texas Petitioners have also proposed that the Commission consider issuing amendments to Part 68 of the Rules to ensure CPE is deployed as 911 compliant.⁵ However, the Commission’s ongoing 911 proceeding (CC Docket No. 92-104) is currently examining CPE compatibility issues. Indeed, the Petition concedes that “the problems of identifying and locating callers stationed behind PBXs, key telephone systems and other equipment have been raised . . . and fully briefed” in that proceeding. Petition at 3 n.2. Thus, there is no need to initiate a new docket related to CPE 911 compatibility or to include CPE issues in any new Notice of Inquiry or other proceeding commenced in response to the Petition.

Finally, the Texas Petitioners propose that Commission should, possibly in a future NPRM, consider “what conditions and specifications should be imposed for an equipment manufacture to meet in order to label a product . . . as 9-1-1 Compliant.”⁶ Of course, technical equipment standards for 911 interoperability will require the active participation of many industry firms and standards bodies. In addition, the Telecommunications Act of 1996 includes new provisions regarding Commission standards-setting activities, which make clear that in connection with interoperability and “coordinated network planing,” the Commission has “oversight” powers and is authorized to “participate . . . in the development of by appropriate industry standards-

⁵ Joint Petition at 7-8.

⁶ Joint Petition at 8.

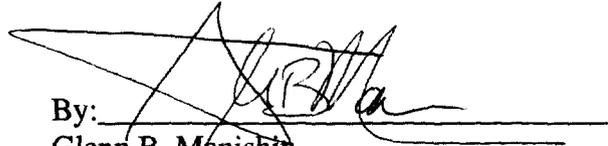
setting organizations of public telecommunications network interconnectivity standards.” 47 U.S.C. § 256(b). Thus, while the Texas Petitioners are correct that additional standards might be necessary for CPE compatibility, if network equipment or telecommunications service standards are required for ensuring 911 interoperability, the Commission should reserve the formation and enforcement of such standards to appropriate private sector industry standards bodies.

CONCLUSION

MCI WorldCom urges the Commission to grant the Texas Petitioners’ request and initiate a proceeding, supported by a technical advisory committee, to examine existing and potential interoperability issues affecting emergency 911 services.

Respectfully submitted,

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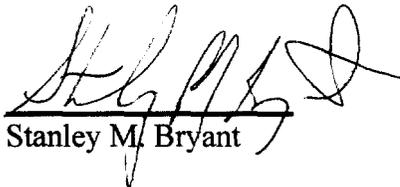
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Dated: September 18, 1998

CERTIFICATE OF SERVICE

I, Stanley M. Bryant, do hereby certify that on this 18th day of September, 1998, that I have served a copy of the foregoing document via overnight delivery and U.S. Mail, postage pre-paid, to the following:



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