

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

SEP 21 1998

In the Matter of)
)
Joint Petition to Ensure) RM - 9343
Interoperability of E 9-1-1 Emergency)
Calling Systems)

MOTION OF AMERITECH TO ACCEPT LATE-FILED COMMENTS

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, Ameritech Corporation ("Ameritech") respectfully requests that the Commission accept one working day late Ameritech's comments, filed concurrently with this motion, in the above-captioned docket. Due to technical problems Ameritech's Washington, D.C. office was not able to file its comments on time.

Ameritech certifies that it has not received, nor has it reviewed, any of the other comments filed in this proceeding. Accordingly, no other party to this proceeding will be prejudiced in any way by granting Ameritech this brief extension of time in which to file its comments.

For the foregoing reasons, Ameritech respectfully requests that the Commission grant this Motion to Accept Late-Filed Comments.

Respectfully submitted,

Larry A. Peck

Larry A. Peck
Counsel for Ameritech
2000 W. Ameritech Center Drive
4H86
Hoffman Estates, IL 60196-1025
847-248-6074

Dated: September 21, 1998
[LAP0208.doc]

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COMMENTS OF AMERITECH

Ameritech files its Comments in response to the Commission's Public Notice released on August 18, 1998, concerning a possible inquiry into E9-1-1 interoperability. The Public Notice was issued as a result of the Joint Original Petition ("Joint Petition") filed by various 9-1-1 agencies in Texas ("Joint Petitioners"). The Joint Petitioners state that an inquiry will document interoperability issues and problems for the Commission's evaluation. However, Ameritech is unaware of any 9-1-1 interoperability issues (either between carriers or between carriers and local public safety agencies) that warrant a national inquiry. Rather, in Ameritech experience, interoperability is being successfully addressed at the local level, and any need for national standards facilitating interoperability is best addressed through the informal industry forum process.

Ameritech has for many years offered 9-1-1 emergency service to the numerous public safety agencies within its region. Over the years, Ameritech has developed and implemented improved versions of emergency services ranging from Enhanced 9-1-1 to Sophisticated 9-1-1 designed to meet the changing needs of the local public safety agencies. Recently, Ameritech has successfully provided access to various 9-1-1 service platforms to competitive local

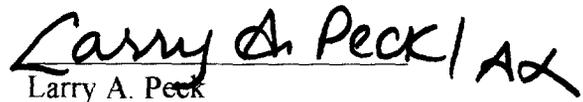
exchange carriers ("CLECs") through interconnection agreements negotiated at the state level under Section 252 of the Telecommunications Act of 1996

Ameritech agrees that access to 9-1-1 emergency service is an integral part of any local telecommunication system, and that interoperability is a critical ingredient to successful 9-1-1 service. Although the Joint Petitioners have accurately identified several technical challenges associated with some local 9-1-1 emergency service platforms, Ameritech still questions the need for a national inquiry. 9-1-1 emergency service is a local service, which is provided under state statutes by local governmental agencies. Throughout the years, Ameritech has successfully resolved interoperability issues at the local level on a case-by-case basis through negotiations with the public safety agencies or carriers involved.

If technical interoperability issues arise in the future which require national attention, Ameritech suggests that these issues be addressed through the appropriate national industry forum or standards body. These bodies have the capability to promptly resolve technical issues by bringing together the required technical expertise from all segments of the industry in an informal, consensus environment.

For the reasons stated above, Ameritech is unaware of any circumstances that warrants a national inquiry into 9-1-1 interoperability.

Respectfully submitted,

A handwritten signature in black ink that reads "Larry A. Peck" followed by a stylized flourish or initials.

Larry A. Peck
Counsel for Ameritech
2000 W. Ameritech Center Drive
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Hoffman Estates, IL 60196-1025
847-248-6074

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