Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket No. 94-102
To Ensure Compatibility with	)	RM-8143
Enhanced 911 Emergency	)	
Calling Systems	)	
	)	
Request for Waiver of	)	DA 98-2323
Section 20.18(c) of the	)	
Commission's Rules	)	

ERRATUM

Omnipoint Corporation files this erratum to correct certain minor errors contained in its "Request for Rule Waiver" filed on December 4, 1998 in the above-captioned proceeding. Specifically, Omnipoint includes herein Attachments 1 and 2 to its Request for Rule Waiver, as well as a signed declaration and certificate of service, which were inadvertently left of the original filing.

Respectfully submitted,

OMNIPOINT CORPORATION

By: Teresa S. Werner
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Its Attorney

Date: December 7, 1998

EXHIBIT 1 – LIST OF OMNIPOINT LICENSES

Market Number	License Description	Frequency Block	Call Sign	Holding Company
M1	New York, NY	A	KNLF202	Omnipoint Communications, Inc.
B025	Atlantic City, NJ	C	KNLF710	Omnipoint Atlantic City License, LLC
B116	Dover, DE	C	KNLF712	Omnipoint Dover License, LLC
B346	Philadelphia, PA-Wilmington, DE-Trenton, NJ	C	KNLF715	Omnipoint Philadelphia License, LLC
B370	Reading, PA	C	KNLF719	Omnipoint Reading License, LLC
B164	Glen Falls, NY	E	KNLG266	Omnipoint Albany-Schenectady-Glen Falls E License, LLC
B007	Albany-Schenectady, NY	E	KNLF880	Omnipoint Albany-Schenectady-Glen Falls E License, LLC
B006	Albany-Tifton, GA	F	KNLF945	Omnipoint Atlanta-Albany F License, LLC
B026	Augusta, GA	F	KNLF946	Omnipiont Atlanta-Augusta F License, LLC
B271	Macon-Warner Robins, GA	F	KNLF947	Omnipoint Atlanta-Macon F License, LLC
B410	Savannah, GA	F	KNLF948	Omnipoint Atlanta-Savannah F License, LLC
B044	Birmingham, AL	F	KNLF949	Omnipoint Birmingham F License, LLC
B158	Gadsden, AL	F	KNLF951	Omnipoint Birmingham Gadsden F License, LLC
B108	Decatur, AL	F	KNLF950	Omnipoint Birmingham-Decatur F License, LLC

Market Number	License Description	Frequency Block	Call Sign	Holding Company
B198	Huntsville, AL	F	KNLF952	Omnipoint Birmingham-Huntsville F License, LLC
B274	Manchester-Nashua-Concord, NH	D	KNLH314	Omnipoint Boston Area DE License, LLC
B363	Presque Isle, ME	D	KNLH316	Omnipoint Boston Area DE License, LLC
B201	Hyannis, MA	D	KNLH311	Omnipoint Boston Area DE License, LLC
B357	Portland-Brunswick, ME	D	KNLH315	Omnipoint Boston Area DE License, LLC
B480	Worcester-Fitchburg-Leominster, MA	D	KNLH319	Omnipoint Boston Area DE License, LLC
B051	Boston, MA	E	KNLH310	Omnipoint Boston Area DE License, LLC
B030	Bangor, ME	E	KNLF953	Omnipoint Boston Area DE License, LLC
B251	Lewiston-Auburn, ME	E	KNLH313	Omnipoint Boston Area DE License, LLC
B465	Waterville-Augusta, ME	E	KNLH318	Omnipoint Boston Area DE License, LLC
B227	Keene, NH	E	KNLH312	Omnipoint Boston Area DE License, LLC
B363	Presque Isle, ME	E	KNLH317	Omnipoint Boston Area DE License, LLC
B051	Boston, MA	D	KNLF954	Omnipoint Boston D License, LLC
B227	Keene, NH	D	KNLF955	Omnipoint Boston-Keene D License, LLC
B363	Presque Isle, ME	F	KNLF956	Omnipoint Boston-Providence-Presque Isle F License, LLC
B364	Providence-Pawtucket, RI-New Bedford, Fall River, MA	F	KNLH320	Omnipoint Boston-Providence-Presque Isle F License, LLC
B379	Rochester, NY	D	KNLH322	Omnipoint Buffalo Area DE License, LLC
B215	Jamestown-Dunkirk, NY	E	KNLF957	Omnipoint Buffalo Area DE License, LLC
B330	Olean, NY-Bradford, PA	E	KNLH321	Omnipoint Buffalo Area DE License, LLC
B330	Olean, NY-Bradford, PA	D	KNLF958	Omnipoint Buffalo-Olean D License, LLC

Market Number	License Description	Frequency Block	Call Sign	Holding Company
B165	Goldsboro-Kinston, NC	F	KNLF959	Omnipoint Charlotte-Goldsboro F License, LLC
B474	Williamson, WV-Pikeville, KY	F	KNLF960	Omnipoint Cincinnati-Williamson F License, LLC
B089	Colorado Springs, CO	F	KNLF961	Omnipoint Colorado Springs F License, LLC
B459	Waco, TX	F	KNLF966	Omnipoint Dallas-Waco F License, LLC
B075	Charlottesville, VA	E	KNLF962	Omnipoint DC Area DE License, LLC
B100	Cumberland, MD	E	KNLF323	Omnipoint DC Area DE License, LLC
B156	Fredericksburg, VA	D	KNLH324	Omnipoint DC Area DE License, LLC
B179	Hagerstown, MD-Chambersburg, PA-Martinsburg, WV	D	KNLH325	Omnipoint DC Area DE License, LLC
B398	Salisbury, MD	E	KNLH326	Omnipoint DC Area DE License, LLC
B461	Washington, DC	E	KNLH327	Omnipoint DC Area DE License, LLC
B029	Baltimore, MD	F	KNLF963	Omnipoint DC-Baltimore F License, LLC
B324	Norfolk-Virginia Beach-Newport News-Hampton, VA	F	KNLF964	Omnipoint DC-Norfolk F License, LLC
B398	Salisbury, MD	D	KNLF965	Omnipoint DC-Salisbury D License, LLC
B111	Des Moines, IA	F	KNLF967	Omnipoint Des Moines F License, LLC
B125	El Dorado-Magnolia-Camden, AR	E	KNLF968	Omnipoint Little Rock-El Dorado E License, LLC
B444	Toledo, OH	D	KNLH305	Omnipoint MI-Indiana Area DE License, LLC
B233	Kokomo-Logansport, IN	D	KNLH296	Omnipoint MI-Indiana Area DE License, LLC
B005	Adrian, MI	E	KNLF943	Omnipoint MI-Indiana Area DE License, LLC

Market Number	License Description	Frequency Block	Call Sign	Holding Company
B047	Bloomington-Bedford, IN	E	KNLH287	Omnipoint MI-Indiana Area DE License, LLC
B093	Columbus, IN	E	KNLH288	Omnipoint MI-Indiana Area DE License, LLC
B112	Detroit, MI	E	KNLH289	Omnipoint MI-Indiana Area DE License, LLC
B126	Elkhart, IN	E	KNLH290	Omnipoint MI-Indiana Area DE License, LLC
B143	Findlay-Tiffin, OH	E	KNLH291	Omnipoint MI-Indiana Area DE License, LLC
B145	Flint, MI	E	KNLH292	Omnipoint MI-Indiana Area DE License, LLC
B169	Grand Rapids, MI	E	KNLH293	Omnipoint MI-Indiana Area DE License, LLC
B204	Indianapolis, IN	E	KNLH294	Omnipoint MI-Indiana Area DE License, LLC
B209	Jackson, MI	E	KNLH295	Omnipoint MI-Indiana Area DE License, LLC
B235	Lafayette, IN	E	KNLH297	Omnipoint MI-Indiana Area DE License, LLC
B241	Lansing, MI	E	KNLH298	Omnipoint MI-Indiana Area DE License, LLC
B255	Lima, OH	E	KNLH299	Omnipoint MI-Indiana Area DE License, LLC
B280	Marion, IN	E	KNLH300	Omnipoint MI-Indiana Area DE License, LLC
B307	Mt. Pleasant, MI	E	KNLH301	Omnipoint MI-Indiana Area DE License, LLC
B310	Muskegon, MI	E	KNLH302	Omnipoint MI-Indiana Area DE License, LLC

Market Number	License Description	Frequency Block	Call Sign	Holding Company
B390	Saginaw-Bay City, MI	E	KNLH303	Omnipoint MI-Indiana Area DE License, LLC
B442	Terre Haute, IN	E	KNLH304	Omnipoint MI-Indiana Area DE License, LLC
B457	Vincennes-Washington, IN	E	KNLH306	Omnipoint MI-Indiana Area DE License, LLC
B033	Battle Creek, MI	F	KNLH329	Omnipoint MI-Indiana Area F License, LLC
B209	Jackson, MI	F	KNLH333	Omnipoint MI-Indiana Area F License, LLC
B005	Adrian, MI	F	KNLF969	Omnipoint MI-Indiana Area F License, LLC
B442	Terre Haute, IN	F	KNLH336	Omnipoint MI-Indiana Area F License, LLC
B309	Muncie, IN	F	KNLH334	Omnipoint MI-Indiana Area F License, LLC
B015	Anderson, IN	F	KNLH328	Omnipoint MI-Indiana Area F License, LLC
B093	Columbus, IN	F	KNLH331	Omnipoint MI-Indiana Area F License, LLC
B373	Richmond, IN	F	KNLH335	Omnipoint MI-Indiana Area F License, LLC
B457	Vincennes-Washington, IN	F	KNLH337	Omnipoint MI-Indiana Area F License, LLC
B039	Benton Harbor, MI	F	KNLH330	Omnipoint MI-Indiana Area F License, LLC
B103	Danville, IL	F	KNLH332	Omipoint MI-Indiana Area F License, LLC
B112	Detroit, MI	F	KNLF970	Omnipoint MI-Indiana-Detroit F License, LLC

Market Number	License Description	Frequency Block	Call Sign	Holding Company
B143	Findlay-Tiffin, OH	D	KNLF971	Omnipoint MI-Indiana-Findlay D License, LLC
B155	Ft. Wayne, IN	F	KNLF972	Omnipoint MI-Indiana-Ft. Wayne F License, LLC
B169	Grand Rapids, MI	F	KNLF973	Omnipoint MI-Indiana-Grand Rapids F License, LLC
B145	Flint, MI	F	KNLF974	Omnipoint MI-Indiana-Lansing F License, LLC
B241	Lansing, MI	F	KNLH338	Omnipoint MI-Indiana-Lansing F License, LLC
B255	Lima, OH	D	KNLF975	Omnipoint MI-Indiana-Lima D License, LLC
B424	South Bend-Mishawaka, IN	F	KNLF976	Omnipoint MI-Indiana-South Bend F License, LLC
B444	Toledo, OH	F	KNLF977	Omnipoint MI-Indiana-Toledo F License, LLC
B293	Miami-Ft. Lauderdale, FL	E	KNLF978	Omnipoint Miami E License, LLC
B293	Miami-Ft. Lauderdale, FL	F	KNLF979	Omnipoint Miami F License, LLC
B469	West Palm Beach-Boca Raton, FL	F	KNLF980	Omnipoint Miami-W. Palm Beach F License, LLC
B314	Nashville, TN	F	KNLF981	Omnipoint Nashville F License, LLC
B480	Worcester-Fitchburg-Leominster, MA	E	KNLG273	Omnipoint New England DE License, LLC
B465	Waterville-Augusta, ME	D	KNLG272	Omnipoint New England DE License, LLC
B427	Springfield-Holyoke, MA	D	KNLG271	Omnipoint New England DE License, LLC
B364	Providence-Pawtucket, RI-New Bedford-Fall River, MA	D	KNLG270	Omnipoint New England DE License, LLC

Market Number	License Description	Frequency Block	Call Sign	Holding Company
B351	Pittsfield, MA	E	KNLG269	Omnipoint New England DE License, LLC
B274	Manchester-Nashua-Concord, NH	E	KNLG267	Omnipoint New England DE License, LLC
B321	New York, NY	D	KNLF982	Omnipoint New York D License, LLC.
B345	Petoskey, MI	D	KNLG268	Omnipoint Petoskey D License, LLC
B240	Lancaster, PA	E	KNLF983	Omnipoint Philadelphia-E. Lancaster E License, LLC
B097	Coos Bay-North Bend, OR	F	KNLF984	Omnipoint Portland-Coos Bay F License, LLC
B401	San Antonio, TX	F	KNLF985	Omnipoint San Antonio F License, LLC
B488	San Juan, PR	F	KNLF986	Omnipoint San Juan F License, LLC
B066	Cape Girardeau-Sikesto, MO	F	KNLF987	Omnipoint St Louis Area F License, LLC
B067	Carbondale-Marion, IL	F	KNLH339	Omnipoint St. Louis Area F License, LLC
B217	Jefferson City, MO	F	KNLH340	Omnipoint St. Louis Area F License, LLC
B355	Poplar Bluff, MO	F	KNLH341	Omnipoint St. Louis Area F License, LLC
B383	Rolla, MO	F	KNLH342	Omnipoint St. Louis Area F License, LLC
B470	West Plains, MO	F	KNLH343	Omnipoint St. Louis Area F License, LLC
B090	Columbia, MO	D	KNLF988	Omnipoint St. Louis DE License, LLC
B161	Galesburg, IL	E	KNLH344	Omnipoint St. Louis DE License, LLC
B230	Kirksville, MO	D	KNLH345	Omnipoint St. Louis DE License, LLC
B308	Mt. Vernon-Centralia, IL	E	KNLH346	Omnipoint St. Louis DE License, LLC
B367	Quincy, IL-Hannibal, MO	E	KNLH347	Omnipoint St. Louis DE License, LLC
B394	St. Louis, MO	D	KNLH348	Omnipoint St. Louis DE License, LLC
B344	Peoria, IL	F	KNLF989	Omnipoint St. Louis-Peoria F License, LLC
B428	Springfield, MO	F	KNLF990	Omnipoint St. Louis-Springfield F License, LLC

Market Number	License Description	Frequency Block	Call Sign	Holding Company
B396	Salina, KS	E	KNLH349	Omnipoint Wichita-E. Hutchinson E License, LLC
B200	Hutchinson, KS	E	KNLF992	Omnipoint Wichita-E. Hutchinson E License, LLC
B472	Wichita, KS	F	KNLF991	Omnipoint Wichita F License, LLC

Before the
Federal Communications Commission
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In the Matter of	)	
	)	
	)	
Revision of the Commission's Rules	)	
To Ensure Compatibility With	)	CC Docket No. 94-102
Enhanced 911 Emergency Calling Systems	)	
	)	

To: Chief, Wireless Telecommunications Bureau

COMMENTS OF OMNIPOINT COMMUNICATIONS, INC.

Omnipoint Communications, Inc. ("Omnipoint"), by its attorney, responds to questions raised in ¶ 10 of the Extension Order issued by the Wireless Telecommunications Bureau in the above-captioned docket.[1] Omnipoint is a new wireless entrant and PCS licensee that offers a range of consumer-oriented digital services to several major markets, including New York, Philadelphia, Boston, and Miami. These markets are served using the worldwide GSM standard technology. Omnipoint understands the importance of making wireless digital service available to the speech- and hearing-impaired. Toward that end, Omnipoint continues to work independently and in concert with industry groups (the TTY Forum, WEIAD, and PCIA) to

1 See *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Order, DA 98-1982 (WTB, rel. Sept. 30, 1998) ("Extension Order").

ensure that speech- and hearing-impaired individuals have access to digital wireless communications.

Before responding to the questions raised in the Extension Order, however, Omnipoint would like to remind the Commission of the ongoing technical complexities associated with transmitting analog modem signals, with a character error rate of less than 1%, through voice coders (vocoders) used in digital systems. As the Commission is aware, digital networks do not directly transmit analog voice signals, as did earlier generations of cellular technology. Instead, digital systems first convert analog voice signals into digital signals (digitization), destroy a portion of it, compress it, and then transmit the voice message between the mobile handset and wireless base station. Indeed, in wireless networks the "digitization" process is not simple, but rather consists of computing mathematical coefficients that model human speech, instead of the "brute force" digitization used in the land telephone network. Since the information being transmitted are coefficients that model human speech behavior, non-voice information is subject to distortion and other problems. (Even something as simple as music-on-hold does not reproduce as well as human voice over a digital wireless system.) Sophisticated vocoders are necessary to meet rather severe capacity, interference, and frequency reuse constraints found in high capacity mobile radio systems.

Unfortunately, optimizing vocoder design for human speech means that non-speech sounds will be reproduced poorly, if at all. Consequently, sending analog modem tones—such as those used by a Baudot TTY phone—over a digital wireless handset is fraught with difficulty. Since users increasingly need data access to the Internet, to corporate Intranets and other data networks, Omnipoint's GSM system incorporates direct data connection abilities. However, the modes supported are only those typically used in modern data networks, such as 9600 b/s ASCII

(7 or 8 bit) asynchronous. Baudot, a 5-bit code invented in the late 1800's and commercially implemented in mechanical teleprinters early in this century, has been obsolescent for two decades. Consequently, the standards bodies that established digital wireless protocols established direct digital connectivity only for currently used modes and excluded 5-bit Baudot as essentially unused in modern data networks.

Broadly speaking, there are two methods of enabling Baudot connectivity over digital wireless systems: (a) to couple an analog modem tone from a TTY phone through the vocoder of a digital handset; and (b) to make a direct data connection from the TTY phone to the handset. Of course, there are various ways of coupling to the vocoder, e.g., through an acoustic coupler, through a direct electrical connection, etc. But, these only change the details, not the two underlying transmission approaches.

Serious problems exist with respect to the first method of transmission. With the current vocoder standards, it is unlikely, at best, that satisfactory communications will be achieved under all combinations of equipment and signal levels. Indeed, in the best circumstances, it appears that only marginally acceptable results will be achieved and even those results will require near optimum radio transmission conditions.

Requiring digital networks to transmit analog modem tones through their vocoders with the same overall quality possible on the land telephone network is analogous to mandating a digital CD player to play an analog LP record; one may, at great effort and expense, be able to modify the CD player so that it could play the LP, but it will neither be small nor efficient. It is more efficient and productive to simply allow CD players to play CDs and phonographs to play LPs. Likewise, it may be more economically efficient to allow analog Baudot TTY users to choose to subscribe to an analog AMPS wireless network and allow users of digital devices

(communicators and ASCII devices) to choose to subscribe to a digital wireless network using GSM or other technologies.

With respect to the second connection methodology, direct data connection, data service is available today from Omnipoint, **where the data device uses the standard 7 or 8-bit ASCII protocol**. Computer cards (PCMCIA-style), integrated phones and organizers and phones with direct data ports (both infrared and RS-232 wire) are all available for purchase today and are fully supported by Omnipoint's GSM network. However, no GSM network (and, we believe, no other wireless digital network technology) currently supports a direct Baudot digital connection. The necessary development and standardization process to support a direct Baudot connection is years away from completion. Further, Omnipoint believes that almost no Baudot TTY phones produced over the last 20 years have a direct data port connection. Thus, supporting a direct Baudot data connection in the digital wireless network will benefit almost no owner of an existing Baudot TTY phone. Moreover, Omnipoint understands that newer TTY phones that possibly do have direct data connections also include the option to communicate in ASCII, which is exactly the mode necessary to use the presently available digital wireless data services. Consequently, there seems to be little benefit in amending the standards to mandate supporting an obsolescent direct Baudot data connection.

With that context, Omnipoint offers is specific responses to some of the questions asked at ¶ 10 of the Extension Order:

1. Specific Action Taken to Comply with the Notification Requirements. In its E911 Reconsideration Order,[2] the Commission required wireless carriers to "make every reasonable effort to notify current and potential subscribers that they will not be able to use TTYs to call 911 with digital wireless devices and services." For the October 1998 billing cycle, Omnipoint sent the following message to existing customers:

> At present, there are no TTY-compatible devices available for use with Omnipoint's network. Those who use TTY devices, therefore, will not be able to use them to make 911 or other calls. Omnipoint continues to work with handset manufacturers to ensure their rapid development of TTY-compatible devices.

Omnipoint is in the process of revising its service terms and plans to include this statement in its service terms as a way to notify potential customers of Omnipoint's TTY-compatibility status. Naturally, Omnipoint will modify this statement when a TTY-compatible device is commercially available for use with Omnipoint's network and shall take appropriate steps to notify current and potential customers of its progress.

2. Interim Measures to Accommodate TTY Users on Omnipoint's Digital GSM Wireless System. Until Omnipoint identifies and implements an appropriate data solution, Omnipoint plans to pursue the feasibility of advising the speech and hearing impaired that a digital communicator can provide access to TTY devices and the hearing community by using Telecommunications Relay Service (TRS).[3] (For those consumers who do not want to upgrade

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2 *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Memorandum Opinion and Order, 12 FCC Rcd. 22665, ¶ 60 (1997) ("E911 Reconsideration Order").

3 As required by the American with Disabilities Act, TRS centers provide voice-to-text and text-to-voice translations on a real-time basis. Communication Assistants ("CAs")located at

(footnote continued to next page)

their analog Baudot TTY devices, Omnipoint will suggest that analog Baudot TTY-users may be better off using an analog wireless provider until a viable data solution is available.) Recent tests, described below, have convinced Omnipoint that digital communicators may be the most viable long-term solution; in the interim, TRS providers may offer an immediate solution to providing the speech and hearing impaired with the ability to report emergency situations.

Earlier this month, Nokia introduced the 9000 iL handset,[4] a digital communicator that works with Omnipoint's GSM network. See attached descriptive brochure. Omnipoint demonstrated that the wireless digital communicator can transmit text messages to an ASCII TTY device located at a national TRS provider. Since the Commission requires TRS providers to be able to handle emergency 911 calls,[5] the speech- and hearing-impaired can thus use the wireless digital communicator to report emergency situations to the TRS. Trained CAs can then

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(footnote continued from previous page)
TRS centers have access to Baudot and ASCII TTY devices and are trained to speak the words typed by a TTY user and type the words spoken by a voice telephone user. CAs can thus provide translation services for TTY (or digital communicator) users, enabling the speech- and hearing-impaired to communicate with the hearing community. See Gallaudet web site at http://tap.galluadet.edu/trs.htm published 10/30/98.

4 In October, Nokia introduced the Nokia 9000 iL Communicator. The sleek, 14-ounce device offers mobile phone, fax, e-mail and Internet functionality and is compatible with Omnipoint's GSM digital network. Nokia's 1/30/98 web-site is offering the Nokia 9000 iL for sale over the Internet at $699. Omnipoint is willing to consider offering a special subsidy to bona fide speech- or hearing-impaired individuals. Omnipoint also understands the Nokia is investigating whether there may be government subsidies available to further reduce the price.

5 See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Notice of Proposed Rulemaking, CC Dkt. No. 98-67, FCC 98-90, at ¶ 40 (rel. May 20, 1998), for recent comments regarding requirements that TRS providers be able to receive and transmit ANI and location information in the same fashion that information is transmitted to PSAPs today.

(footnote continued to next page)

locate the appropriate PSAP and tell them of the caller's situation. Further, the TRS provider can automatically translate the ASCII signal to a Baudot signal, so as to provide a direct connection between a mobile customer and a fixed Baudot user.

On October 13, Omnipoint used the Nokia 9000 iL to dial AT&T's national, toll-free ASCII TTY TRS center (1-800-855-2882).[6] A trained CA answered Omnipoint's text message and continued to transmit and receive text messages from the communicator. The following is a verbatim copy of the exchange:

> ca 0628 (F) nbr calling pls ga
>
> No number – this is a test from Omnipoint Communications, a wireless carrier in New Jersey.
>
> ok gaThanks [sic] for the test and good afternoon.
>
> Signing off now.,
>
> thank you bye sksk

The success of this test leads Omnipoint to believe that this combination of equipment and services may be a realistic interim solution. The regular typewriter-style keyboard and display screen are specifically designed for typing and reading text messages,[7] a significant

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6 Omnipoint used the standard "Terminal" client setting and programmed the device with the following connection settings: local echo -- "ON"; modem initialization (scripts or AT command) – "AT+CBST=2,0,1".

7 The standard font size on the Nokia 9000 iL may not be large enough for all users, so Omnipoint is working with Nokia to develop a more complete terminal emulation program that

(footnote continued to next page)

improvement over the practical concerns associated with transmitting a short message service (SMS) over a mobile handset keypad. Although a user would have to dial a ten-digit 800 number to reach a 911 operator, communicator users could program the number on a speed dial button. Dialing the 800 number may in fact make it easy for mobile users to reach PSAP centers in areas that may not yet offer "911" dialing.[8]

Omnipoint recognizes that some users may object to using an intermediary to reach a 911 center. This possible impediment is not more significant or burdensome than what landline TTY users may face presently, however, and may actually offer mobile users better access to PSAPs in those instances where PSAPs may not have installed TTY devices. Using TRS service may also overcome issues associated with the inability of analog Baudot TTY devices to communicate with digital ASCII TTY devices, as the TRS centers can automatically convert between ASCII and Baudot. Finally, users who may not want to use a TRS center can, of course, elect to use analog AMPS service until a more elegant long-term digital data solution is available.

Omnipoint believes that the availability of using a digital communicator and TRS service for immediate access to 911 emergency help offers a viable intermediate solution. Omnipoint

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will allow users to select a larger font size if they desire. Omnipoint has also asked Nokia to provide an automatic line feed carriage return to provide a cleaner, more legible text message.

8 According to NENA's web-site, approximately 15% of the population is not covered by some type of 9-1-1. See http://www.nena9-1-1.org/History%20of%20NENA%20and %2091110/30/98.htm.

plans to conduct field tests and involve representatives from the speech- and hearing-impaired communities before officially introducing this solution.

3. Timetable for Implementation of a "Data" Solution. Omnipoint has met with representatives of ITCenter, a Swedish manufacturer of a device that converts ASCII to Baudot mode. The proposed data solution does not provide alternate voice/text connectivity, but it does offer real-time access to TTY devices via a digital communicator. During its visit with Omnipoint, ITCenter established a network connection over Omnipoint's GSM network, linked back to its home Swedish GSM provider and demonstrated that the Nokia 9000 iL can send and receive text messages from a Baudot TTY device. Omnipoint is in the process of exploring whether this potential long-term data solution can be modified to function in Omnipoint's network and, if so, whether it will meet the Commission's and consumers' requirements. (Note that this still requires an ASCII phone connection.)

Since this solution involves use of a proprietary device that will have to be modified to work with Omnipoint's American network (including U.S. signaling and protocols), it is difficult to give a definitive estimate of when the solution would be available for commercial use. As a tentative estimate, Omnipoint believes it could take anywhere from 18-24 months to implement this solution in its network. Omnipoint will continue working with this vendor as well as explore other possible Inter-Working Function solutions.

4. Laboratory Location for Upcoming Testing of Digital Wireless Phones. Omnipoint is working with the TTY Forum and a representative of GSM NA to coordinate TTY testing of Ericsson and Nokia handsets. Details of the test plan can be found in the PCIA/CTIA filing. (Realistically, Omnipoint does expect that test results will be available before January 1, 1999.)

5. Omnipoint's Plans for Providing Equipment and Service to Facilitate Future Field Tests. Omnipoint has not been asked to provide equipment or services for testing purposes but will entertain requests from members of the TTY Forum.

For these reasons, Omnipoint urges the Commission to consider the information contained herein when evaluating any further requests for an extension of the November 15, 1998, compliance deadline.

Respectfully submitted,

OMNIPOINT COMMUNICATIONS, INC.

By: /s/

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Its Attorney

Date: October 30, 1998

DECLARATION

I, Tony Costa, declare under penalty of perjury of the laws of the United States that the following statements are true to the best of my knowledge and belief:

1. I am employed by Omnipoint Communications Services, LLC as a Product Director, Network Services, with responsibility for TTY implementation at Omnipoint.

2. I have reviewed the attached "REQUEST FOR RULE WAIVER" and the factual statements made therein are true to the best of my knowledge and belief.

Tony Costa

Date: December 4, 1998

WASH01A:129398:1:06/04/98
21278-15

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing Request for Rule Waiver have been sent via hand delivery on this 7th day of December, 1998, to the following:

Mr. Jerry Vaughn
Acting Chief
Wireless Telecommunications Bureau
Federal Communications Commission
Room 5002-B
2025 M Street, NW
Washington, DC 20554

Ms. Won Kim
Wireless Telecommunications Bureau
Federal Communications Commission
Room 7112-B
2025 M Street, NW
Washington, DC 20554

Ms. Elizabeth Lyle
Wireless Telecommunications Bureau
Federal Communications Commission
Room 5002-H
2025 M Street, NW
Washington, DC 20554

Mr. Martin Liebman
Wireless Telecommunications Bureau
Federal Communications Commission
Room 7002-E
2025 M Street, NW
Washington, DC 20554

Mr. Steven Weingarten
Wireless Telecommunications Bureau
Federal Communications Commission
Room 7023
2100 M Street, NW
Washington, DC 20554

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

Teresa S. Werner

Teresa S. Werner