



GTE Service Corporation

1850 M Street, N.W., Suite 1200
Washington, D.C. 20036-5801
202 463-5200
Fax: 202 463-5298

June 2, 1999

Ms. Magalie R. Salas, Secretary
Federal Communications Commission
Washington, DC 20554

Re: Ex Parte Filing - CC Docket No. 94-102 (E911)

Dear Ms. Salas:

This is to advise that Gordon Maxson, Charon Harris and Chris Jones of GTE met with Jim Schlichting, Barbara Reideler, Nancy Boocker, Marty Liebman, Julie Buchanan and Ron Netro of the Wireless Telecommunications Bureau and Rebecca Dorch and Robert Bromery of the Office of Engineering and Technology of the FCC today to discuss the status of Wireless E911 Deployment. Alan Wolfe and Bhaskar Srinivasiah of GTE Wireless participated by telephone for a short period of time..

A copy of the discussion materials is attached.

GTE will seek another meeting in the near future to explore further technical questions. If you have any questions, please contact me at 463-5291, fax 463-5239, or e-mail gmaxson@dcoffice.gte.com, or May Chan at 463-5292, e-mail mchan@dcoffice.gte.com.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Gordon Maxson".

F. Gordon Maxson
Director - Regulatory Affairs

Attachment

C: All FCC Participants

Wireless E9-1-1 Deployment

1- Rollout & Implementation Status

- . Where We Are Today
 - . Year-end 1999 Projection
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2 - Examples Of GTEW Facilitation

- . Passing Legislation
 - . State Boards
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3 - Recommendations for the Future

- . Stay the Course
 - . Consider Targeted Assistance
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Rollout & Implementation Status

Phase I Status

- 1) Seventeen of GTEW's 23 states have legislation in place—at least three more (FL, HI, TN) expected to have in place by end of the summer. (IL is also possible).
 - All 17 have begun assessing the fee.
 - GTEW has remitted funds in most states.
 - 2) After legislation, the key factor is to promote the operation of the various Boards and their development of rules for cost recovery.
 - Wireless E9-1-1 legislation broke the old mold—created state boards to oversee fund collection and disbursement (including reports to State Legislature on Status on annual basis).
 - While Boards are authorized and operating in 14 states—9 of them have established rules for wireless cost recovery (another 3 states are pending and should be in place by mid July). (CA needs plan – Governor has requested; WA is unclear).
 - Our year-end projections are to have services fully implemented and operational in eight GTEW states. GTEW has received 182 requests and anticipates 22 additional requests. This will mean that GTEW will serve 38% of the PSAPs in these 8 states and 17% of those in the entire 23-state GTEW system.
 - RECENT DEVELOPMENTS:
 - Tennessee approved the first Phase II funding mechanism in the nation Thursday night (SJR 225).
 - Good signal from Gov. Bush in Florida Thursday afternoon (signed two related bills linked to the main HB 621).
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Examples of Facilitation on the Issue

GTEW Is A Leader In The Industry On E911

- 1) GTEW has “reached out” to State NENA and APCO chapter leadership to initiate legislative action.
 - Hired outside counsel in 8 states to draft mutually agreed to legislation for introduction (keeping that counsel involved until legislation finalized/passed).
 - Hired outside lobbyists (in addition to existing company lobbyists) to help in passage in some states).
 - 2) Made time available for key management to participate on Boards.
 - 3) Once legislation passed and Boards named, hosted organizational meetings of the Board. (Gave overview of legislation, suggested items that needed to be done, even assisted with first few agendas, forms, rules).
 - 4) Serve as “Clearinghouse” role.....share forms and knowledge of what various states are doing with other boards.
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Recommendations For the Future

Phase I

Stay the course!

- GTEW believes that changes to the cost recovery process at this time would have a devastating effect on the E911 deployment and set back the progress that has already been made.
- Allow more time—the processes in place are working. After initial start-up time, current progress has accelerated. (We're on the verge of some significant deployment in the second half of 1999. 2000 will bring much more.)
- Consider letters to states and professional organizations highlighting those that are moving forward, for example Indiana.

Acknowledge Progress.

- For GTEW, rollout of E911 is a top priority. While at times the Phase I process has been slower than we would have liked, the various state processes are individual and sometimes political.
- GTEW and other carriers have developed a model Phase I cost recovery "manual" to help the state boards to implement the legislation.

Hold All Parties Accountable.

- Ask NENA, APCO, and wireless carriers for an assessment of the status of rollout among their members/states.
 - Consider asking states for status on Phase I and plans for Phase II.
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Recommendations For the Future

Phase I I

Phase II Cost Recovery Must Follow Phase I.

- Legislative model put in place for Phase I will accommodate Phase II.
- Give the states time.
- Be flexible (what works for one carrier, state or local, may not work elsewhere).

Update on technology selection

- GTEW is examining all of its options for Phase II.
- Status of Snaptrack Alpha trial – results were promising.
- Looking at True Position's network-based solution.
- Timing – Up in the air based on technology providers.

Fast Facts About Implementation:

- GTE Wireless serves 23 states. Of these 23 states, 17 have legislation governing wireless E9-1-1.
- Of the 6 states that do not already have legislation, 4 are considering legislation this year. Three have passed legislation that is awaiting the Governor's signature.
- All of the 17 states that have wireless E9-1-1 legislation have begun assessing some type of wireless E9-1-1 fee.
- Of the 17 states that have E9-1-1 legislation, 9 have implemented cost recovery rules. Three more are currently considering cost recovery rules.
- GTEW's service area includes 1,191 PSAPs. Of these 1,191 PSAPs, only 375 have requested implementation of Phase I E9-1-1 Service.
- GTEW has rolled out service in PSAPs in Alabama and PSAPs in Indiana, including the Indianapolis MSA.

GTE's Involvement

- GTEW has been active in promoting legislation at the state level and helping legislators enact wireless E9-1-1 statutes.
- GTEW has been involved in the activities of 9-1-1 Boards across the U.S. GTEW has testified before numerous 9-1-1 Boards and helped formulate Board regulations. GTEW has several employees serving on 9-1-1 Boards.
- GTEW has maintained a constant awareness of activities regarding wireless E9-1-1 in all of the states it serves.
- GTEW has been proactive in working with 9-1-1 administrators. GTEW has maintained close relations with Board members and staff, submitting necessary documentation and information in an efficient manner. GTEW has dedicated numerous staff hours to making sure that E9-1-1 implementation runs smoothly.

GTE Wireless E9-1-1 Survey
June 1, 1999

| State | Wireless E-911 Legislation | Eff. Date of Charge | Fee | Board Established ¹ | Cost Recovery Rules Established | 911 Deployment | PSAPs served by GTEW | Phase I Request Letters Received ² | PSAPs Implemented | Comments |
|-------|----------------------------|--------------------------------------|-------------------------------|--------------------------------|---------------------------------|----------------|----------------------|---|-------------------|---|
| AL | Yes | 5/1/98 | \$0.70 | Yes | Yes | Yes | 38 | 30 | 2 (18 by 6/15/99) | GTE Wireless has deployed service in Shelby and Walker Counties. |
| AR | Yes | 9/1/97 | \$0.50 | Yes | Yes | No | 2 | 0 | | Arkansas deployment has been slowed because of PSAP reluctance to track wireless call volume. Legislation changed procedure to % of population in 1999. |
| CA | Yes ³ | Early 90's | 0.72% | Yes | No | No | 220 | 11 | | State must develop plan for deployment and cost recovery |
| FL | Pending (Passed) | 8/1/99 | \$0.50 | No | ----- | No | 71 | 27 | | Awaiting Governor's signature. |
| GA | Yes | 7/1/98 | \$1 max. | Multiple Boards | Yes | No | 3 | 2 | | Georgia presents a challenging state for carriers to implement in since individual counties determine whether or not to implement service. |
| HI | Pending (Passed) | Est. by Board | Initially \$0.30, \$0.50 max. | No | ----- | No | 5 | 0 | | |
| ID | No | ----- | ----- | ----- | ----- | No | 13 | 0 | | In preliminary discussions concerning legislation, Idaho has been very resistant to carrier cost recovery provisions. |
| IL | Pending (Passed) | 90 days after Board establishes rate | (up to \$0.75) | No | ----- | No | 27 | 5 | | |

¹ The entity governing E9-1-1 funds and procedures is not always a 911 Board. Some states' legislation delegates this authority to existing agencies. For purposes of this document, an affirmative answer is indicated whenever the regulatory body governing wireless E9-1-1 has been set up.

² As of May 1, 1999

³ California does not have a wireless E9-1-1 program *per se*. California added language to include wireless carriers to existing legislation.

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|-------------------------|----------------------------|---------------------|----------|--------------------------------|---------------------------------|----------------|----------------------|---|-------------------|--|
| IL-- City of Chicago | Yes | | \$1.25 | N/A | ----- | No | | | | |
| IN | Yes | 5/1/98 | \$0.65 | Yes | Yes | Yes | 114 | 86 | 20 | GTE Wireless has deployed service in 12 counties in Indiana, including the Indianapolis area. |
| IA | Yes | 1/1/99 | \$0.50 | Yes | Yes | No | 16 | 2 | | State concerns over how to implement the 911 database have delayed implementation in Iowa. |
| KY | Yes | 8/15/98 | \$0.70 | Yes | Draft to be discussed 6/3/99 | No | 43 | 7 | | Kentucky has postponed rulemaking for cost recovery until a new 911 Director is appointed by the Governor. |
| MS | Yes | 4/13/98 | \$1.00 | Yes | Pending | No | 5 | 5 | | Cost recovery rules are to be approved at June 16 meeting. |
| MO | Yes** | | No | No | No | No | TBD | 0 | | **The Missouri Legislature passed wireless E-911 legislation. Its funding provision was subject to voter referendum. Earlier this year, Missouri voters did not approve. |
| NM | No | ----- | ----- | ----- | ----- | No | 29 | 0 | | |
| NC | Yes | 10/1/98 | \$0.80 | Yes | Yes (Interim Rules) | No | 28 | 25 | | Board moving rapidly. Expect deployment to begin by 9/1/99 |
| OH | Pending | | (\$0.65) | No | ----- | No | 185 | 101 | | Legislation introduced. Hearings in June. |
| OR | Yes ⁴ | | \$0.75 | | | No | 7 | 0 | | Broad interpretation of existing statute allows cost recovery. |
| PA | No | ----- | ----- | ----- | ----- | No | 1 | 0 | | Problems exist. |

⁴ Oregon law requires all telecommunications providers to remit a \$0.75/access line charge. Wireless subscribers are specifically included.

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|---|----------------------------|---------------------|---|--------------------------------|---------------------------------|----------------|----------------------|---|------------------------|---|
| SC | Yes | 11/1/98 | \$0.55 | Yes | Yes | No | 17 | 6 | | Board is in final stages of approving GTEW's cost recovery plan. |
| TN | Yes | 7/1/99 | \$0.85, raised to \$1.00 for Phase II after one carrier rollout in four major markets | Yes | Yes | No | 124 | 21 | | Board has been established. GTEW's cost recovery plan has been approved by the Board. |
| TX | Yes | 9/1/97 | \$0.50 | Yes | Pending | No | 151 | 3 | | Texas cost recovery rules will be discussed at a July 14 meeting. |
| VA | Yes | 7/1/98 | \$0.75 | Yes | Yes | No | 93 | 8 | | Cost estimate process approved in May. |
| WA | Yes ³ | | Counties may implement a wireless basic 911 surcharge of \$.25 | Yes | No | No | 64 | 14 | | Washington Dept. of Revenue and Legislature do not believe carriers are entitled to cost recovery. They insist that carriers raise rates to offset costs. |
| Totals | | | | | | | | | | |
| | 23 | 17 | | 14 | 9 | 2 | 1,191 | 375 | 22 | |
| Totals for states that have approved cost recovery (AL, AR, GA, IN, IA, NC, SC, TN, VA) | | | | | | | | | | |
| | | | | | 9 | 2 | 419 | 178 | 22 (12.4% of requests) | |
| Totals for states that have cost recovery pending (KY, MS, TX) | | | | | | | | | | |
| | | | | | 3 | 3 | 199 | 37 | 0 | |
| Year End 1999 Projection (AL, GA, IN, IA, NC, SC, TN, VA) | | | | | | | | | | |
| | | | | | 8 | 8 | 534 | 182 | 204 | |

³ Washington law allows counties and municipalities to levy a tax of up to \$.25 on wireless subscribers.