

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility With Enhanced 911)	RM-8143
Emergency Calling Systems)	

Reply Comments of Motorola, Inc.

Motorola, Inc., ("Motorola") hereby submits its replies to comments in response to the *ALI Public Notice* released by the Wireless Telecommunications Bureau on June 1, 1999.¹

Motorola again urges the Commission to expeditiously resolve the uncertainties surrounding initiation of Phase II E911, especially in light of its recent *Location Technology Roundtable*.²

Motorola also takes this opportunity to submit additional information concerning its proposal for location accuracy methodology.

I. The Commission Should Act Expeditiously To Provide Guidance To The Wireless Industry Concerning ALI.

Motorola reiterates its request that the Commission quickly act upon comments raised in response to the *ALI Public Notice*. As was noted by several wireless carriers and equipment providers in the recent *Location Technology Roundtable*, uncertainty surrounding compliance

¹ See Public Notice, Wireless Telecommunications Bureau Requests Targeted Comment on Wireless E911 Phase II Automatic Location Identification Requirements, released June 1, 1999, DA 99-1049 ("*ALI Public Notice*").

² The Office of Engineering and Technology held a location technology roundtable at the Commission meeting room on June 28, 1999 ("*Location Technology Roundtable*"), See Technical Roundtable on Implementation of Automatic Location Identification ("ALI") for Enhanced 911 ("E911") Technologies To Be Held June 28, 1999, DA 99-1141, released June 9, 1999.

with the Commission's requirements for ALI has greatly slowed the implementation process. A Commission determination concerning measurement of location accuracy would enable wireless carriers and equipment manufacturers to make decisions concerning the best ALI solution for their particular requirements. Additionally, the Commission still must provide clarification to the wireless industry concerning handset-based solutions and how they will be accommodated within the Phase II requirements. Without expeditious action by the Commission, the wireless industry will be unable to develop a standards-based approach to ALI, with open, interoperable interfaces between all handset and network entities in a timely manner.

II. The Record Support Demonstrates That The Commission Should Modify Its Current ALI Accuracy Standard.

Almost unanimously carriers, third party ALI vendors and equipment manufacturers have urged the Commission to modify its methodology for ALI accuracy.³ A number of different proposals have been provided by individual commenters, and Motorola asks that the Commission carefully consider each proposal and modify its current location accuracy requirements in accordance with the best approach. As part of these reply comments, Motorola provides additional information concerning its proposal to use Mean Radial Error ("MRE") as the methodology for measuring location. Motorola asserts that its proposal is a compromise that fully maintains the Commission's desire to obtain the best ALI accuracy for all callers while also being more attainable for ALI systems. Motorola again notes that MRE provides a relatively better

³ See *e.g.*, Comments of Aerial Communications at 5, Comments of AirTouch at 18, Comments of ALLTEL at 3, Comments of AT&T Wireless at 3, Comments of BellSouth at 8-9, Comments of Cambridge Positioning Systems at 2-3, Comments of Ericsson at 5-6.

methodology for measuring ALI accuracy, but reiterates that there is no ideal ALI accuracy methodology for measuring all situations.

CONCLUSION

For the reasons set forth above, Motorola urges the Commission to promptly resolve the outstanding issues surrounding implementation of Phase II E911 so that the wireless industry can move towards industry-standardized ALI solutions. Motorola also asks that the Commission clarify its ALI accuracy methodology and proposes the use of MRE methodology to aid in the resolution of this issue.

Respectfully submitted,

Motorola, Inc.

By: _____/s/_____

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