



# Illinois Department of Transportation

Office of the Secretary  
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July 12, 1999

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File No. NSD-L-99-24, CC Docket No. 92-105

Mr. Magalie Roman Salas  
Commission Secretary  
Portals II  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

Dear Mr. Salas:

The Illinois Department of Transportation (IDOT) submits the following comments in response to the Federal Communications Commission's (FCC) request for comments concerning an abbreviated dialing code (N11) to access intelligent transportation system services nationwide.

IDOT is responsible for planning, building and maintaining state and federal highways in the state of Illinois. We believe N11 systems could provide the travelling public with information that would make their travel safer and more effectively use the existing infrastructure. However, we have the following concerns.

Implementing a nationwide N11 system would require time to properly coordinate so the travelling public would receive consistent service in all areas and understand what services are available. Providing a service that meets the diverse needs of the travelling public would be a considerable task, particularly in rural areas.

The information included in the current proposal suggests the services expected would include items such as detailed road conditions and bus schedules. IDOT uses an 800 number and a local Chicago area number to provide road condition information to the travelling public. Both are accessible from anywhere in the country. Providing access to the information desired by the travelling public may be difficult near county and state borders. The N11 service that mobile callers would receive through wireless systems near borders is also a concern.

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The Summary Petition to the FCC on N11 states that most state and local governments are prepared to implement this service. Given the multi-jurisdictional nature of this problem, we think the presumption that state and local governments are prepared to implement N11 service may be an overstatement. Even if N11 were to be only a menu system that switched callers to existing services, determining which services qualify and in what order they would be placed on the system would be a significant task.

The increased volume of calls could exceed the capacity of existing systems. Systems to handle the volume of calls a N11 number would generate would be costly to build and operate. There would also be a cost associated with providing links between various systems if wide area or nationwide access was allowed. A source of funding for this operation has not been identified.

In addition, in Illinois, providing updated road and traffic condition reports for state routes as well as Interstate routes would be beyond the capability of existing staff. The quality and level of service proposed - on the spot transportation and traveler information, such as road conditions and bus schedules - would be difficult and costly to achieve. Live operators who can respond to callers' requests staff 911 and 311 operations. The cost of staffing these operations is significant. If the type of service the public expects from 911 and 311 services are any indication of the level of service expected from a N11, it would require very significant resources.

Illinois does not have the systems in place required to handle N11 so it would be necessary to design, fund and procure such a system. Illinois is not ready for immediate implementation. We believe a migration period of several years would be necessary to allow development of a N11 system.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Kirk Brown  
Secretary

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