

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

In the Matter of

Information Sought On Methods For)	ET Docket No. 99-300
Verifying Compliance With E911)	DA 99-2130
Accuracy Standards)	

COMMENTS OF GTE

GTE Wireless Incorporated and its affiliated cellular and PCS licensees (collectively "GTE"), respectfully submits these comments in response to the *Verification Public Notice* released by the Wireless Telecommunications Bureau on October 8, 1999.¹ For the reasons set forth herein, GTE urges the Commission to reaffirm that any wireless E911 location accuracy guidelines are strictly recommendations and are not mandatory requirements. Additionally, GTE suggests that the Commission study the CDMA Development Group ("CDG") Test Plan for helpful guidance in promulgating Commission guidelines concerning E911 location technology.

BACKGROUND

In response to industry comments and requests, the Commission recently adopted a *Third Report and Order* in CC Docket 94-102² that specifically permitted the

¹ See Public Notice, Information Sought on Methods For Verifying Compliance With E911 Accuracy Standards, ET Docket No. 99-300, released October 8, 1999, DA 99-2130 ("*Verification Public Notice*").

² See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Third Report and Order*, FCC 99-245, released October 6, 1999. ("*Third Report and Order*")

use of handset-based as well as network-based location solutions for wireless E911. The *Third Report and Order* required two levels of accuracy for each Automatic Location Identification (“ALI”) technology that is to be used in conjunction with wireless E911 calls to locate mobile units.³ Additionally, as a key component of this decision, the Commission tasked the Office of Engineering and Technology (“OET”) and the Wireless Telecommunications Bureau (“WTB”) to expeditiously develop and publish methods that could be used for verifying compliance with ALI accuracy requirements.⁴ OET and WTB were directed to work along with all interested parties, including equipment manufacturers, system operators, public safety organizations, standards groups, and organizations with relevant expertise in performing such measurements.⁵ The Commission also expected OET and WTB to take into account the practical and technical realities of the provision of ALI service, including the fact that not all calls can be completed, nor can ALI always be provided.⁶

In response to the Commission’s direction, OET and WTB released a public notice requesting technical information on measuring the accuracy of ALI systems.⁷ The *Verification Public Notice* presented a myriad of questions concerning measurement requirements and techniques for verifying ALI system compliance and

³ See *Third Report and Order* at ¶¶ 72, 74. Specifically, network-based systems were required to achieve an accuracy of 100 meters for 67 percent of all calls and 300 meters for 95 percent of all calls. Handset-based solutions were required to meet an accuracy of 50 meters for 67 percent of all calls and 150 meters for 95 percent of all calls.

⁴ See *Third Report and Order* at ¶ 85.

⁵ See *Third Report and Order* at ¶ 85.

⁶ *Id.*

⁷ See *Verification Public Notice* at page 1.

additionally requested information on the elements that should be taken into account or incorporated into a test procedure for E911 compliance.⁸

I. The Commission Should Adopt ALI Location Guidelines And Not Mandatory Procedures.

In providing for the development of a compliance verification procedure, the Commission in the *Third Report and Order* suggested that the establishment of a methodology that “[m]ay be used for verifying compliance with our rules governing Phase II” would be in the public interest.⁹ GTE urges the Commission to reaffirm this commitment to only provide guidance to affected parties on location accuracy compliance. Any Commission mandates to follow exacting technical requirements or details could be counterproductive. As the Commission has recognized, the industry continues to work collaboratively to resolve the multitude of technical issues surrounding Phase II location solutions.¹⁰ These efforts are nearing completion and any effort by the Commission to attempt to codify location accuracy compliance methodology could potentially have a deleterious effect on these discussions and agreements. Furthermore, the Commission’s aggressive schedule for implementing its proposed guidelines is an additional deterrent to attempting to require compliance methods. The *Verification Public Notice* has only provided affected parties three short weeks to discuss, agree upon and provide meaningful technical data and information to the Commission about this most critical issue.

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Id.

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See *Third Report and Order* at ¶ 85.

¹⁰

See *Third Report and Order* at ¶ 84.

GTE urges the Commission to carefully consider and receive input from all affected parties in establishing any such guidelines. Through this cooperative effort, GTE feels that the Commission will be in position to release a recommendation for parties to follow in demonstrating compliance with ALI requirements.

II. The Commission Should Study the CDG Test Plan For Insight On Location Accuracy Compliance.

GTE requests that the Commission consult the extensive work that the CDG has accomplished in attempting to provide location technology evaluation for the CDMA wireless industry. The CDG Test Plan has been developed through the efforts of CDMA wireless carriers, equipment manufacturers and third party location solution vendors in an attempt to evaluate the accuracy, reliability, sensitivity, speed, complexity, location reporting capability and capacity of CDMA location technology.¹¹

While this test plan may be more expansive and contains more detail than necessary for any Commission guidelines, GTE recommends that the Commission review this document in order to aid its process of providing guidance to the wireless industry on location accuracy compliance, especially for CDMA systems. Additionally, some or several of the test methods discussed in the CDG test plan may apply to other air interfaces or can be modified to do so. GTE also supports any Commission efforts to augment the CDG test plan with measurement aspects that may not be covered in the current version. Any Commission recommendations can be carefully studied by the

¹¹ See *CDG Test Plan Document For Location Determination Technologies Evaluation (Rev 0.6)* at 2.

CDG and similar test forums for the other air interface technologies to determine the need for additional steps to ensure accuracy compliance.

CONCLUSION

For the reasons set forth above, GTE encourages the Commission to not adopt any mandatory requirements concerning location accuracy compliance. Instead, GTE urges the Commission to study the CDG Test Plan and develop guidelines that all affected parties may choose to follow in order to ensure compliance with the Commission's ALI requirements.

By: _____/s/_____
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