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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

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Re: WT Docket No. 99-328  
911 Digital Multimode Call Processing Method Proposed By Nokia Inc.

Dear Ms. Salas:

On January 18, 2000, Leo Fitzsimon and Sharad Huilgol of Nokia Inc. and the undersigned participated in a Conference call with Dan Grosh, Blaise Scinto, and Patrick Forrester, staff of the Wireless Telecommunications Bureau. The purpose of the call was to address issues related to Nokia's request in the above-captioned docket.

During the conference call issues were addressed that relate to the time under Nokia's proposal that would be required for checking analog and digital channels when an emergency call is initiated by multimode handsets. The following information was provided:

- Time to validate a channel
  - For multi-mode multi-band handsets, the maximum possible total elapsed time to go from preferred analog to non-preferred analog after looking for digital on all digital channels (42 PCS and 4 800 MHz cellular) is 46 x 30 msecs, or 1.38. For multimode cellular units the max. total elapsed time is 120 msecs. (.12 second).
  - If a digital channel is found (a decision made based on RSSI), it typically take 800 msecs for the mobile to validate the channel and initiate the call.

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- The handset will look for RSSI on those channels that are specified in the standards for each digital system, and will not recognize digital signals other than one compliant with that of the handset.
- Lock-in problem
  - Voice and data on digital systems are identical and indistinguishable. Therefore, unlike analog systems, the chances of lock-in are negligible. Nevertheless, Nokia has proposed a recovery mechanism to remove any doubt.
  - During emergency mode, if a digital or analog voice channel assignment is received but the call is dropped, the next new emergency call is initiated on the next available system. This further assures that there is no potential for a lock-in problem to occur.
- We are not proposing to eliminate any of the Commission's requirements, but rather, propose to expand the scope to include digital systems. For example, for multimode phones, digital systems are capable of assigning analog voice channels to continue the communication when moving outside the digital coverage area, but the opposite is not true. Therefore, one using digital their call will be continued on the analog system, but if the communications is initiated using analog and the signal is lost, there is no automatic handoff to digital.

Pursuant to § 1.1206 of the Commission's rules, an original and one copy of this letter are being filed in the above-referenced proceeding and a copy is being delivered to Ms. Scinto and Messrs. Grosh and Forrester. Please direct any questions regarding this matter to the undersigned.

Sincerely,



David R. Siddall  
Counsel to Nokia, Inc.

DRS/smb

cc: Blaise Scinto  
Dan Grosh  
Patrick Forrester  
Carl Hilliard