

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	CC Docket 94-102
TTY Access to Digital Wireless	)	(DA 00-1091)
Systems for 911 Calls	)	<b>CORRECTED VERSION</b>

**COMMENTS OF NENA,  
APCO AND NASNA**

The National Emergency Number Association (“NENA”), the Association of Public-Safety Communications Officials-International, Inc. (“APCO”) and the National Association of State Nine One One Agencies (“NASNA”) hereby respond to the Public Notice of May 17, 2000, DA 00-1091, in the captioned proceeding. The Commission proposes that December 31, 2001 be the new deadline for compliance with Section 20.18(c) by wireless carriers operating in digital mode. The rule requires that subject wireless licensees

be capable of transmitting 911 calls from individuals with speech or hearing disabilities through means other than mobile radio handsets, *e.g.* through the use of Text Telephone Devices (TTY).

The regulation is in force when the wireless mode of operation is analog. It has been waived, however, for digital carriers pending the resolution of technical incompatibilities between the Baudot signaling conventionally used in TTYs and wireless transmissions in digital mode.

NENA, APCO and NASNA representatives have participated actively in the TTY Forum of carriers, manufacturers, emergency and relay service providers, and consumer/user advocacy groups first convened nearly three years ago. On the basis of our understanding that the consumer and user groups are satisfied with the 18-month interval between now and December

2001, we do not object to the new deadline. We echo, however, the Commission's concern that it be taken seriously by manufacturers and carriers so that there is no need for further extension.

It seems sensible to reinstate, over these 18 remaining months, the quarterly reporting by which the Commission and the public had been kept apprised of technical and social issues discussed in the TTY Forum. Assuming prompt adoption of a Commission order in this proceeding, the first such report could be scheduled for December 2000. At a minimum, the reports should speak to the status of the standards processes on which the choice of the new deadline is predicated. The Public Notice describes in detail progress to date on the Lucent and Ericsson proposed solutions. There is little information about the status of work on the Motorola solution to be applied to its iDEN technology.

To the extent the Commission feels it needs Section 255(b) of the Communications Act to enforce its choice of deadline as to manufacturers, we agree that statute is available. However, NENA would not wish its use to introduce any doubt or debate as to whether digital/TTY compatibility is "readily achievable." We believe that already has been determined, at least for the Lucent and Ericsson solutions. We hope and trust this is true for the Motorola solution.

The comments of NENA, APCO and NASNA are animated by their primary and continuing concern for the safety and well-being of citizens with hearing or speech disabilities trying to reach 9-1-1 for emergency assistance through the digital wireless network. We urge the Commission to adopt the shortest feasible deadline and to emphasize that earlier compliance is

permitted and encouraged. We recommend serious penalties for carriers and manufacturers who fail to meet a reasonable deadline without good explanations.

Respectfully submitted,

NENA, APCO and NASNA

By \_\_\_\_\_/s/\_\_\_\_\_

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