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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	
Implementation of 911 Act	WT Docket No. 00-110
The Use of N11 Codes and Other Abbreviated Dialing Arrangements	CC Docket No. 92-105

BELLSOUTH COMMENTS

BELLSOUTH CORPORATION

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October 16, 2000

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BellSouth Corporation, by counsel and on behalf of itself and its affiliated companies ("BellSouth"),[1] respectfully submits these comments on the *Third Notice of Proposed Rulemaking ("Third NPRM")* and the *Notice of Proposed Rulemaking ("NPRM")* in the above-captioned proceedings.[2]

I. INTRODUCTION

In fulfilling its obligation to implement the Wireless Communications and Public Safety Act of 1999 ("911 Act"),[3] the Commission has taken a number of significant steps. Specifically,

[1] BellSouth Corporation is a publicly traded Georgia corporation that holds the stock of companies that offer local telephone service, provide advertising and publishing services, market and maintain stand-alone and fully integrated communications systems, and provide mobile communications and other network services world-wide.

[2] *Implementation of 911 Act,* WT Docket No. 00-110, *Notice of Proposed Rulemaking; The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket No. 92-105, *Fourth Report and Order and Third Notice of Proposed Rulemaking*, FCC 00-327 (rel. August 29, 2000) ("*NPRM,*" "*Fourth Report and Order,*" and "*Third NPRM*").

[3] Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, enacted Oct. 26, 1999, 113 Stat. 1286, amending the Communications Act of 1934, 47 U.S.C. §§ 222, 251 ("911 Act").

in its *Fourth Report and Order* in CC Docket No. 92-105, the Commission designated 911 as the universal emergency telephone number within the United States for both wireline and wireless telecommunications services. The Commission also initiated the instant rulemaking to seek comment on, among other things: (1) the appropriate transition periods for areas in which 911 is not currently in use as the emergency number and (2) ways to facilitate states' efforts to deploy comprehensive emergency communications systems.[4]

BellSouth is firmly committed to doing its part to meet the nation's public safety and emergency communications needs. Moreover, BellSouth will continue to work closely with government officials and the public safety community to facilitate the deployment of 911 in an efficient and cost-effective manner. BellSouth believes that the Commission has properly followed Congress's mandate and has focused its attention on "encourag[ing] and support[ing]"[5] states in developing and implementing end-to-end emergency communications systems rather than micromanaging the nationwide deployment of 911. The use of guidelines, clearinghouses, forums, and other information-sharing measures as proposed by the Commission are an effective means by which to assist state and local authorities in their implementation efforts. Although BellSouth supports many of the Commission's proposals, it urges the agency to leave the critical decisionmaking to the key stakeholders (state and local officials, the public safety community, and the carriers).

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[4] *Fourth Report and Order*, ¶ 2.

[5] 911 Act, Section 3(b).

II. THE COMMISSION SHOULD ALLOW CARRIERS AND STATE OR LOCAL AUTHORITIES TO DEFINE REASONABLE TRANSITION PERIODS FOR THOSE AREAS IN WHICH 911 IS NOT CURRENTLY THE EMERGENCY NUMBER.

The Commission seeks comment on the factors that should be taken into account in adopting transition periods to allow carriers sufficient time to transition to the use of 911 as the universal emergency telephone number.[6] Rather than establish fixed transition periods, the Commission should allow state and local authorities to work together with carriers and the public safety community to define reasonable transition periods for their respective communities. These entities are in the best position to establish transition periods that meet the particular needs of their areas.

Moreover, the 911 Act plainly acknowledges that there is no one-size-fits-all approach for 911 implementation. As Congress explicitly stated, "transition periods should be determined by *service area-specific circumstances and capabilities, rather than a single period applied to all regions.*"[7] A single, fixed implementation schedule therefore is both inappropriate and unauthorized. The Commission itself acknowledges this fact when it states that "[i]mplementation of the 911 abbreviated dialing code should recognize the varying conditions that exist in communities throughout this country"[8] and "that communities throughout the United States are at differing points relative to implementation of 911."[9]

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[6] *Third NPRM*, ¶ 19.

[7] H.R. Report No. 106-25, at 13-14 (1999) ("House Report") (emphasis added).

[8] *Third NPRM*, ¶ 17.

[9] *Id.*

BellSouth urges the Commission to take this thought process to the next level. Since communities are at different implementation points throughout the U.S., it would be arbitrary to impose fixed transition periods on these communities. Implementation schedules should be determined on a local basis where the stakeholders can take into account factors such as current technical capabilities, infrastructure plans, availability of funds, the readiness of a Public Safety Answering Point ("PSAP"), demographics, etc. This approach is fully consistent with Congress's objectives. As the legislature appropriately recognizes, "most of the key decisions in this area will not be made by the Federal government; they will be made in the private sector, and by State and local governments."[10] Accordingly, the Commission should refrain from imposing mandatory implementation deadlines and allow the affected parties to define reasonable transition periods.

What the Commission can and should do is focus its attention on assisting state and local officials in areas where 911 is not the emergency assistance number. The provision of 911 has steadily been on the rise in the U.S. According to the National Emergency Number Association ("NENA"), "[a]t the end of the 20th century, nearly 93% of the population of the United States was covered by some type of 9-1-1 service. Ninety-five percent of that coverage was Enhanced 9-1-1. Approximately 96% of the geographic US is covered by some type of 9-1-1."[11] These statistics clearly demonstrate that states, carriers, and public safety administrators have been working together to bring 911 service to the public. Moreover, the Commission's rules requiring

[10] House Report at 7 (emphasis added).

[11] The Development of 9-1-1, National Emergency Number Association, http://www.nena9-1-1.org/PressRoom_Publications/9-1-1_facts.htm. In 1996, the Commission pointed out that 89% of wireline phones in the United States were served by 911, and about 85% of 911 services included some form of E911. *Revision of the Commission's Rules To Ensure Compatibility with*

wireless carriers to provide basic and E911 service have further enhanced the deployment of 911 service across the country. Accordingly, the Commission need not establish complex rules and mechanisms to meet Congress's goal of ubiquitous 911 service. The nation is already close to achieving that goal.

The Commission should instead direct its efforts toward supporting those localities where 911 service is unavailable or 911 is not the emergency assistance number. The Commission's first step should be to identify the areas at issue and target those areas for assistance. Another step might be for the Commission to work with NENA, carriers, and states that have already deployed 911 to identify the various stages of 911 implementation as well as typical timeframes required for each stage. Once this information is compiled, it can be used by various entities as a valuable resource for planning and budgeting purposes. States, PSAPs, and carriers alike could tailor the information to fit their respective needs.

In its efforts to promote 911 deployment, the Commission is also encouraged to rely on work already completed by 911 participants. For example, NENA has compiled a checklist (attached hereto) detailing the numerous steps involved in the implementation of wireless 911.[12] As NENA appropriately points out, "there are no national seminars or reference models that address all the subtleties and nuances of [a] particular PSAP or system."[13] Thus, no two implementation plans and schedules will be alike.

Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Report and Order and Further Notice of Proposed Rulemaking*, 11 FCC Rcd 18676, 18679, ¶ 5 (1996).

[12] Wireless 9-1-1 Checklist, National Emergency Number Association, located at http://www.nena9-1-1.org/Wireless911Webpage/Wireless911Checklist.htm (attached hereto as Attachment A) ("NENA Wireless 9-1-1 Checklist").

[13] NENA Wireless 9-1-1 Checklist at 1.

Rather than establishing fixed transition periods for the deployment of 911, the Commission should allow the needs and resources of the various communities to drive their respective implementation schedules. The Commission has explicitly stated that it is "not requiring States and localities to implement 911 as the emergency assistance number where they do not have 911 service."[14] Given the Commission's narrow authority, the Commission's primary role should be to champion the nationwide deployment of 911 by fostering information sharing and coordination among the stakeholders, not to mandate artificial deadlines. This role is fully consistent with the 911 Act and achieves the appropriate balance between federal and state responsibilities.

Further, allowing affected parties to work together to define reasonable 911 implementation schedules on a community-by-community basis will avoid imposing undue burdens and costs on the stakeholders as mandated by Congress.[15] The implementation of 911 service requires state or local authorities and public safety administrators to invest in facility and equipment upgrades in order to transmit and receive 911 information. Thus, the transition to 911 is not without its costs, and forcing an arbitrary schedule on the stakeholders will only increase these costs.

As demonstrated above, 911 implementation issues must be addressed at the local level, not the federal level. The Commission clearly has an important role, but it should not be to micromanage. Accordingly, BellSouth urges the Commission to refrain from adopting fixed

[14] *Fourth Report and Order*, ¶ 11.

[15] 911 Act, Section (3)(b) ("Nothing in this subsection shall be construed to authorize or require the Commission to impose obligations or costs on any person.").

transition periods for the deployment of 911 and instead allow state or local officials, the public safety community, and carriers to establish reasonable schedules based on their needs.

III. THE COMMISSION SHOULD NOT REQUIRE CARRIERS TO ROUTE 911 CALLS TO A PARTICULAR AGENCY OR DESTINATION IN AREAS WHERE THE STATE OR LOCAL AUTHORITIES HAVE NOT ESTABLISHED A PSAP OR OTHER ANSWERING POINT.

BellSouth strongly supports the Commission's tentative conclusion not to impose an obligation on carriers to transmit 911 calls to a particular local agency or similar destination in areas where state or local authorities have not established a PSAP or other answering point.[16] This obligation would not only impose an unnecessary burden on carriers but also seriously jeopardize public safety.

Carriers are not in the position to make the choices inherent in determining the appropriate destination of a 911 call. Therefore, state or local authorities charged with protecting the public safety must determine where 911 calls are delivered because they are most familiar with the needs of their communities. They are in the best position to weigh factors such as demographics, personnel needs, and the availability of funds when determining where to route emergency calls. For example, in Area A, the local authorities may elect to route 911 calls to the police department because that department has sufficient staff to handle the volume of calls. However, in Area B, it may be more appropriate, based on local needs, to route 911 calls to the fire station. Designating answering points for 911 calls should be left to the discretion of local officials and public safety organizations based on the particular circumstances and needs of the

[16] *See Third NPRM*, ¶ 21.

locality. Carriers are not equipped to make these decisions and therefore should not be required to do so.

In addition, all stakeholders should be aware that the possible destinations for a 911 call will be determined by the type of 911 service provided. If "Basic" 911 service is offered, there is only one possible destination for each 911 call because the carrier's end office (also referred to as a "central office") is programmed to point all 911 calls to a single destination. Under an Enhanced 911 (E-911) service arrangement, however, multiple destinations are possible. Nevertheless, under either arrangement, it is imperative that the state or local authority select the appropriate answering point for 911 calls. If the government fails to select a destination, the 911 caller will likely get a recorded announcement indicating that he/she has reached a non-working number. The obvious and serious result will be the lack of access to emergency communications services. Clearly, such access is absolutely essential to save and protect lives. Accordingly, BellSouth urges the Commission to require government officials to coordinate with public safety communities to determine the destination for all 911 calls.

IV. THE COMMISSION SHOULD NOT REQUIRE CARRIERS TO FILE 911 PROGRESS REPORTS.

The Commission asks whether it should require carriers to file reports in order to monitor carrier progress in transitioning to the universal use of 911.[17] The Commission also seeks comment on "whether carriers are the best source of information on the status of deployment of statewide 911 services."[18]

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[17] *Third NPRM*, ¶ 22.

[18] *NPRM*, ¶ 25.

BellSouth objects to mandating that carriers submit 911 progress reports. State and local officials are in the best position to report on the status of their 911 implementation efforts. They have the requisite knowledge regarding infrastructure plans, financial constraints, current technical capabilities, and PSAP readiness. For example, PSAPs often negotiate their equipment needs with vendors directly. As such, the carrier is unaware of the status of the project or the implementation schedule. The only information that the carrier typically has access to is the status of its own network implementation efforts, and such information is only a small piece of the puzzle regarding 911 deployment. Thus, the Commission should not require carriers to submit progress reports since such reports would provide very limited information.

V. A NATIONAL CLEARINGHOUSE WILL SUPPORT STATE AND LOCAL EFFORTS TO IMPLEMENT 911.

BellSouth supports the Commission's proposal to create a clearinghouse that will gather information on the status of implementation of 911 across the country.[19] A clearinghouse will increase the availability and flow of information among interested parties. BellSouth further recommends that NENA serve as the national clearinghouse. NENA is intimately familiar with issues involving emergency communications and already serves as a valuable information resource for PSAPs, the public safety community, and government officials. Moreover, NENA's involvement would avoid imposing unnecessary administrative burdens on the Commission.

BellSouth also supports the development of state-level clearinghouses to complement the efforts of a national clearinghouse. These state-level entities, like their national counterpart, could serve as resource centers and provide access to state-specific information that may not be

[19] *See NPRM*, ¶ 26.

available at the national level. For example, one of their primary responsibilities should be to establish and maintain a centralized database listing the telephone numbers and addresses for the local police, fire, and other emergency service providers in a particular state.[20] Carriers, particularly new entrants, often have no way of accurately identifying and locating the relevant PSAP or other central answering point in a region. This arrangement will help facilitate coordination among the stakeholders and minimize the delay in implementing 911.

Finally, BellSouth supports the development of a "model" state plan as proposed by the Commission.[21] The creation of a "model" plan will eliminate some of the guesswork for states and allow them to tailor the "model" plan to fit their needs. BellSouth believes that proposed measures such as the sharing of information through a clearinghouse and the creation of a "model" implementation plan will assist states in their efforts to promote ubiquitous 911 service.

VI. CONCLUSION

BellSouth recognizes the value of designating 911 as the universal emergency number for wireline and wireless telecommunications services and generally supports the Commission's efforts to support states in their deployment efforts. Nonetheless, BellSouth cautions the Commission against establishing rules, such as fixed transition periods, that will impose unnecessary burdens and costs on state and local authorities, public safety communities, and carriers. Rather, the Commission should focus its efforts on assisting those areas in which 911

[20] The contact data should not include the unlisted/unpublished "routing" numbers that carriers use within their networks to route E911 calls. Use of these special "routing" numbers will result in unidentified (anonymous) calls arriving at the PSAP.

[21] *See NPRM*, ¶ 27.

service is unavailable, fostering information sharing at both the federal and state level, and allowing the stakeholders at the local level to determine what best suits their needs.

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October 16, 2000

ATTACHMENT A

(9-1-1 EMERGENCY NENA National Emergency Number Association

Recommended Steps for Implementation—

A Wireless 9-1-1 Checklist for PSAPs

Wireless 9-1-1 Checklist v.2
(47 kb; Adobe PDF; Instructions)

Implementation of wireless 9-1-1 services is one of the most significant challenges facing public safety agencies today. The FCC has mandated that wireless carriers implement wireless 9-1-1 for public safety agencies that request the service. Even with the FCC mandate, actual implementations of wireless 9-1-1 are few and far between, falling below the expectations of regulators, carriers, and public safety.

In an attempt to assist PSAPs with the challenge of implementing wireless 9-1-1, NENA hosted two Critical Issues Forums in April 2000. Industry experts shared current status of regulatory and political challenges, defined the operational issues facing wireless 9-1-1, and provided guidance for PSAPs on how to pursue implementation of wireless 9-1-1 for their jurisdictions.

In preparation for these forums, the NENA CIF planning committee developed the attached "Wireless 9-1-1 Checklist." This checklist represents the combined experience and acquired knowledge of numerous parties involved in live implementations of wireless 9-1-1 across the nation. The team's objective in developing this checklist was to create a simple, yet comprehensive set of action steps that any PSAP could use to guide their implementation efforts.

This checklist will be modified as new knowledge is uncovered, and new versions will be released. As you pursue your wireless 9-1-1 implementations, please share your key learning/knowledge with NENA, so that your fellow public safety professionals can benefit from your experiences.

Wireless 9-1-1 Checklist

This checklist is provided as a tool to assist 9-1-1 authorities in the implementation of Phase I Wireless 9-1-1 service. NENA makes no claim that this is an all-encompassing list, nor that the steps are listed in the order that applies to every PSAP. The expectation is that each PSAP authority that undertakes the implementation of Wireless 9-1-1 service will customize the list as their circumstances dictate. Over time, we would hope that members add steps that may have been omitted.

STEP 1 Initial Decision

Determine that you want to implement Phase 1 Wireless 9-1-1 Service. In making this decision consider the following:

a) For this step you are not making a final decision. You should be looking at the operational side of the house such as equipment, staffing, and the idiosyncrasies of wireless calls, etc.

b) This initial decision may be based more on political considerations than on facts and figures.

c) Keep in mind that wireless emergency calls tend to take longer than wireline calls, due largely to the inability of the caller to give an exact location.

d) You will typically receive far more calls per incident on wireless than on wireline.

e) If you are the dispatching agency for emergency services in your area, you are already receiving at least some of these calls. They may be coming to you through some other agency (e.g. State or County Police) and may be filtered, but they are coming into your center.

f) If you are not taking any wireless calls right now, your PSAP will probably get bigger. You may only need a couple more trunks, or you may need additional answering positions and personnel to staff them, but you will grow.

g) Some money now will save a lot of money later. The implementation of wireless 9-1-1 technology will reduce the average handling time per call, freeing your call takers to answer more calls. Wireless 9-1-1 calls are growing each year as the number of wireless phones continues to increase. If you do not implement Wireless 9-1-1, the cost of additional call takers and answering positions will soon surpass the costs associated with Phases I and II.

h) All 9-1-1 systems differ slightly, due to the differences in demographics, political climate, funding mechanisms, configurations, PSAP CPE technology, GIS capability and 9-1-1 service provider technology from one county to the next and from state to state. Because of this, there are no national seminars or reference models that address all the subtleties and nuances of your particular PSAP or system. You will be using what are, essentially, off-the-shelf items to implement Wireless 9-1-1, but finding a model exactly like yours to follow will be extremely difficult. You will have to address all the issues.

i) If you are fairly sure that your system or PSAP will choose to proceed, go to the next step.

STEP 2 Initial 9-1-1 Service Provider (LEC) Contacts

Contact the technical representative from your 9-1-1 service provider. You need to determine that company's ability to provide Wireless 9-1-1 services and their preferred technology.

a) From this conversation, you should look to determine the impact, if any, on your CPE, trunk configuration, ALI display format and/or computer aided dispatch system, as well as any options that might be available to you.

b) If your 9-1-1 provider will meet with you before you send the letters requesting Phase I service, (most will) then you might include this meeting as part of the first step.

c) Remember that there is no provision, in any legislation, that requires you to blindly accept the service in the manner they (the carriers and/or the 9-1-1 service provider) prefer to provide it. You do have choices and there are provisions for settling disputes, which, hopefully, will not be needed.

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STEP 3 Notifications

Determine who the wireless providers in your area are and:

a) Send the wireless carriers certified letters, indicating that you want to begin negotiations to accept wireless Phase I 9-1-1 calls. (Note that nowhere is the term contract used.)

b) Include a date for the first planning meeting. Generally speaking, it is a good idea to allow 30 days notice.

c) Copy these letters to your 9-1-1 service provider (typically, the LEC).

This step begins the process of developing the cost estimates, workload estimates, and technology choices available to you on an individual case basis.

STEP 4 Planning Meeting

Conduct a get-to-know-one-another meeting with all of the participants that will be involved in your implementation process. Indicate to them that you will not discuss proprietary issues.

a) This meeting should include:
   - all of the wireless carriers (may include any subcontractors they utilize)
   - your 9-1-1-service provider
   - your CPE provider
   - your CAD vendor
   - your mapping vendor.

Attempt to resolve the following issues at this meeting:

b) The method of Wireless 9-1-1 call delivery to be employed, agreed to by all participants. It will be CAS, NCAS, or a Hybrid CAS solution.

c) Establish how the number of trunks from each wireless carrier to the selective routing tandem(s) will be determined. NENA will be issuing an official recommendation later this year:
   - The 9-1-1 authority and the wireless carrier should establish geographic areas to be served by 9-1-1 trunk groups. These geographic areas may be as small as a single city or as large as an entire state. It is expected that many will serve a county or small group of counties.
   - The wireless carrier is responsible for determining how many trunks are required to provide a P.01 grade of service to the designated geographic area and communicating that information to the 9-1-1 authority.
   - Establishing trunk groups for specific defined geographic areas provides congestion control (management of the volume of calls from any one geographic area) and facilitates default routing assignments.

d) Determine if you will establish a separate set of wireless 9-1-1 trunks from the selective routing tandem to your PSAP(s). Note the cost for these would probably be borne by the PSAP authority.

e) Separate wireless trunk groups are not necessary but they do provide a guard against the blocking of wireline 9-1-1 calls in the event of a major incident in public view. This does not necessarily mean a total duplication of the wireline trunk group to the PSAP. You need to discuss this thoroughly with your 9-1-1-service provider.

f) As mentioned in Step 1, your PSAP is, almost certainly, going to have to grow to accept wireless calls. Once the total offered load from all the wireless carriers has been computed, your 9-1-1 service provider will assist you in determining how many additional trunks, if any, are required to the PSAP.

g) Select default and alternate PSAPs. Make sure everyone involved understands the difference.

h) Identify if any of the players are utilizing subcontractors. You should understand the role and responsibilities of the subcontractors, as well as who is accountable for their performance.

i) Ask all of the players how they will implement Network Reliability Council and NENA recommendations regarding diversity and redundancy. Ask for explanations of how calls will flow (or not flow) if individual components or communications links fail.

j) Talk about pANIs (pseudo Automatic Number Identification), ESRDs (Emergency Services Routing Digits) and ESRKs (Emergency Services Routing Keys) so that you understand what they are. You will be involved in making a choice concerning which of these methods of identifying cell sites and or cell faces will be employed in your system. Ask about the effects each will have on your ALI information, the ability to identify your response agencies, the support of Selective Transfer, and the flexibility for PSAP reassignment.

k) Discuss cell sector naming conventions. Establish what information will go in the Subscriber Name field versus the Street Address field. NCAS requires the creation of default records in the ALI database that may require special attention.

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l) Determine if any of the issues described above create any special demands on, or problems for, your CPE.

m) Determine how your mapping system, if you have one, will interface with the wireless calls and be used to identify the responders assigned to the area covered by the cell/sector. It might also be used to facilitate transfers to neighboring PSAPs. If it can do any of these things, it may give you more flexibility and more choices. Computerized mapping is not mandatory, but is absolutely recommended, especially in Phase II.

n) Attempt to determine, in general terms, what costs the wireless carriers, 9-1-1 service provider and PSAP CPE supplier intend to bill to the PSAP authority, if any. Ask specific questions about circuit costs, database interface costs and engineering fees. Details should be obtained in writing in private meetings.

o) Note: In 1999, the FCC removed the requirement that a cost recovery mechanism (for the wireless carrier's costs) be in place for Phase I implementation to begin. Your state, however, may already have established a mechanism for carrier cost recovery. The FCC ruling does not preempt any state or local mechanisms.

p) Provide a mechanism for your wireless carriers to interface with your 9-1-1 service provider, so that each understands the other's role. They will need to communicate regarding the ordering of trunks (from the MSC to the selective router) and database access, among other things. Your goal is to help establish this working relationship and make sure it continues until implementation is completed. Do not allow them to stop talking to each other or to start talking to each other only through you. Be vigilant and stay involved, but don't do their job for them.

q) Do not assume that the carrier representatives understand how wireless 9-1-1 works or how it relates to your current 9-1-1 system. Some will and some will not.

r) Identify the primary contact for your system or PSAP, so that everyone knows who to keep in the loop.

s) Identify the specific individuals in each company that will be managing their portion of the implementation. Ask for telephone numbers, pager numbers and e-mail addresses.

t) Identify the NENA company ID and 24X7 contact number for each carrier.

u) Develop a test plan that describes, in detail, all the aspects of the testing phase. Ask each carrier to submit a test plan. You have the option of allowing each carrier to use their own plan, or developing a master test plan from those you receive. Do not let any carrier connect without providing a test plan.

v) Arrange for individual meetings to discuss anticipated workload, cell routing, subscriber base in your coverage area and any other proprietary issues.

w) Discuss any applicable state or local legislation or regulations. Keep in mind that 9-1-1 service providers, specifically the LECs, are regulated at the state and federal level, but wireless carriers are only regulated at the federal level.

x) Set time lines to move forward if you feel comfortable with the information you have received. If you need to obtain more information before a final decision is made, make that known.

y) Establish trouble reporting procedures and expectations.

z) Establish notification procedures for major outages.

Once this meeting has ended and a decision has been made, you will need to stay active with all the parties involved as you proceed through the implementation process. Each company will probably assign a Project Manager to coordinate their internal activities, but you will be (or provide) the overall Project Manager.

STEP 5 Identify Cell Coverage—Treatment of Proprietary Information

a) The wireless carriers can provide you with RF coverage maps for all the cells in your service area. This usually requires execution of a non-disclosure agreement or other proprietary information release form. This is a fairly standard procedure for the provision of RF coverage maps, and will typically require the assistance of legal counsel.

b) From these maps, you will be able to associate individual cells and sectors with individual PSAPs. The goal is to identify the cells/sectors in each PSAP's service area, in order to establish call routing assignments. Wireless calls may not necessarily route to the same PSAP as wireline calls from the same area. The 9-1-1 authority may choose to route all wireless calls to a single PSAP or subset of PSAPs.

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c) Cells along the border should be reviewed to determine if the majority of the serving area of one or more sectors is in the jurisdiction of a neighboring agency. This will determine routing for those sectors to your system versus someone else's.

d) This review should be done during face-to-face meetings and you should consider having representatives from the PSAPs/systems immediately surrounding yours present. This will assist in determining which PSAP will accept calls from cell sites along the borders and eliminate any contention down the road.

e) Keep in mind that you will have to perform this step with each carrier individually. They will share their RF coverage information with the PSAP authority on a one-on-one basis, but will absolutely not share it with their competitors in the room. If your area is served by two 800 MHz cellular carriers, three 1.9GHz PCS carriers and an ESMR carrier, plan on having six separate meetings.

f) 9-1-1 systems are very often deployed on a county or state level. Wireless telecommunication systems are deployed according to FCC-franchised trading areas, which may cover an entire state or parts of several states. To get optimum cooperation and results from the carriers, try to address Wireless 9-1-1 at the scale of the trading area or as close to it as possible. This may require a cooperative effort among several PSAP authorities.

STEP6 Implementation

Develop an implementation plan based on the output from the planning meeting. 9-1-1 service providers and some wireless carriers often provide project management assistance.

a) Issue Purchase Orders and/or Letters of Intent, as appropriate. You will need to issue some type of written order to each wireless carrier, your 9-1-1 service provider, your CPE provider and any other vendors involved in the project.
   - Even if no money will change hands, a written document is required to constitute an official order for service. The six-month implementation clock starts only after a valid order has been received.

b) Hold regularly scheduled project meetings. Have each player provide a status report. Proprietary details should be discussed privately. Track the progress of each player. Try to identify potential problems sooner rather than later.

c) Try to hold to a firm but flexible schedule. Deadlines will be missed, but should be immediately rescheduled. Activities for which there is no target date may never be completed.

d) Stagger the cutover schedule. Don't attempt to activate Phase I service from six carriers on the same day. Spread them out, especially the first two or three. You may want to schedule one carrier on Monday and another on Wednesday of the first week. If all goes well, you can accelerate the schedule for the remaining carriers. If you have problems, you will have time to address them before the next carrier compounds the problem.

   - Do not schedule cutovers on Friday or the day before a holiday. You want the carriers and your 9-1-1 service provider to be fully staffed the first 2-3 days of operation.

e) Post-implementation items that should be included in a Service Agreement:
   - Determine method for obtaining new and revised cell information from the carriers.
   - Determine method of notification for new carriers entering your serving area.
   - Track call volumes to determine ongoing trunking requirements.
   - Obtain usage data from carriers for MSC-to-9-1-1 tandem trunks.
   - Obtain usage data from 9-1-1 service provider for tandem-to-PSAP trunks.

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CERTIFICATE OF SERVICE

I do hereby certify that I have this 16th day of October, 2000 served the following parties to this action with a copy of the foregoing *BELLSOUTH COMMENTS*, WT Docket No. 00-110, CC Docket No. 92-105, by hand delivery, or by placing a copy of same in the United States Mail, addressed to the parties listed below.

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Rachelle L. Thomas

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**Via Hand Delivery*