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FEDERAL COMMUNICATIONS COMMISSION MAR - 8 2001  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Revision of the Commission's Rules )  
To Ensure Compatibility with )  
Enhanced 911 Emergency Calling Systems )

CC Docket No. 94-102

To: The Commission

COMMENTS OF NEXTEL COMMUNICATIONS, INC.

Nextel Communications, Inc. ("Nextel") respectfully submits these Comments in support of the January 29, 2001 Petition for Reconsideration ("Petition") of the Cellular Telecommunications and Internet Association ("CTIA") in the above-referenced proceeding.<sup>1</sup> As expressed by CTIA in its Petition, the Federal Communications Commission ("Commission") should clarify that its Fourth Report and Order in this proceeding does not require the wireless industry to address proprietary TTY protocols in developing compatible wireless handset equipment.<sup>2</sup>

TTY users, TTY manufacturers and the wireless industry (including both carriers and manufacturers) agreed through the TTY Forum that wireless carriers would develop equipment that is compatible with the current Baudot standard for TTY devices. As this is the only non-proprietary technology used by TTY manufacturers and is an available industry standard, all parties agreed that wireless carriers would ensure compatibility with that standard. For several months, Nextel and its manufacturer, Motorola, Inc., have been working to develop the necessary network and handset changes that will permit the use of

<sup>1</sup> Petition for Reconsideration of the Cellular Telecommunications & Internet Association, filed January 29, 2001, CC Docket No. 94-102.

<sup>2</sup> See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Fourth Report and Order, FCC 00-436 (rel. December 14, 2000)("Fourth R&O").

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TTY devices with Nextel's handsets, pursuant to the Baudot standard agreed upon through the TTY Forum. Moreover, pursuant to the Fourth R&O, Nextel intends to have this capability integrated into its network by the Commission's June 30, 2002 deadline.<sup>3</sup>

Thus, in light of the efforts Nextel and Motorola have made to date to accommodate the Baudot standard and ensure Nextel's compatibility with that standard, Nextel is concerned by the Commission's discussion of digital TTY protocols in the Fourth R&O and its suggestion therein that wireless carriers and manufacturers may be required to make additional changes to ensure compatibility with any number of digital proprietary TTY protocols. Recognizing that TTY manufacturers are developing digital devices that no longer rely on the Baudot standard, the Commission stated that these "enhancements [to TTY devices] may interfere with the effective transmission of emergency calls" requiring "the industry to continue [to] work on this problem..."<sup>4</sup> To the extent TTY manufacturers are pursuing upgraded technologies using proprietary protocols, the Commission cannot expect wireless carriers to ensure compatibility with all of these protocols. It was for that very reason that the TTY Forum agreed that wireless telecommunications equipment and services would be developed for compatibility with the Baudot standard.

To accommodate these improved TTY technologies while continuing to ensure the transmission of emergency calls from TTY devices on wireless systems, Nextel supports the Commission's proposal to require TTY manufacturers to "ensure that, if an enhanced protocol cannot be used on a particular digital wireless system, the devices should revert to Baudot in order for the emergency call to go through."<sup>5</sup> In other words, TTY manufacturers should continue to pursue improved digital TTY technologies, thus providing TTY users an enhanced customer experience, but those advances should ensure a default to Baudot where necessary to transmit a wireless 911 call. This allows TTY users to enjoy the

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<sup>3</sup> *Id.* at ¶ 1.

<sup>4</sup> *Id.* at ¶ 22.

advances in technology while also ensuring the ability to make a 911 call from a wireless device – without requiring the industry to reopen the standards process and ultimately further delay the deployment of the Baudot standard on wireless TTY devices.

For these reasons, Nextel supports the Petition of CTIA and respectfully requests that the Commission clarify its Fourth R&O to ensure that wireless carriers are not required to continually modify their systems to accommodate changing – and proprietary – TTY protocols.

Respectfully submitted,

By, 

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<sup>5</sup> *Id.*

CERTIFICATE OF SERVICE

I, Rochelle L. Pearson, hereby certify that on this 8<sup>th</sup> day of March 2001, caused a copy of the attached Comments of Nextel Communications, Inc. to be first-class mail, postage prepaid to the following:

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