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Christine M. Gill
Attorney at Law
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MCDERMOTT, WILL & EMERY

April 5, 2001

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APR 5 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL

VIA MESSENGER

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

**Re: Notice of *Ex Parte* Meeting; E911 Implementation/Nextel Waiver,
CC Docket No. 94-102**

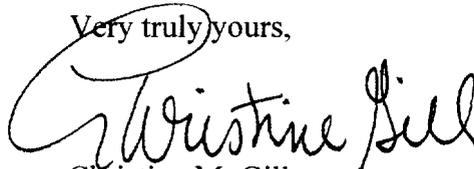
Dear Ms. Salas:

This is to notify you that Michael Rosenthal, Holly Henderson and Steven Puckett of Southern LINC and Christine Gill of McDermott, Will & Emery, met yesterday (April 4, 2001) with Kelly Quinn, Kris Monteith, Blaise Scinto, Daniel Grosh and Patrick Forster of the Wireless Telecommunications Bureau to discuss the Comments filed by Southern LINC in the above-referenced proceedings. The parties discussed the matters referenced on the attached outline and addition discussed the position set forth by Southern LINC in the filings made in the above-referenced dockets.

Attached also are copies of letters from St. Clair County Communications District E-911, Alabama Wireless 9-1-1 Board and Dothan-Houston Count Communications District to the FCC, which demonstrate the need for roaming.

In accordance with the Commission's rules, two copies of this *ex parte* notice are provided herewith for inclusion in the record of the above-referenced proceeding.

Very truly yours,


Christine M. Gill

Enclosures

cc: Kelly Quinn
Kris Monteith
Blaise Scinto
Daniel Grosh
Patrick Forster

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**Meeting with Kris Monteith (Chief, Policy Division) and
Kelly Quinn (Legal Advisor, Office of the Bureau Chief)**

Wireless Telecommunications Bureau

Wednesday, April 04, 2001

- Southern is actively pursuing E-911 solution
 - Southern iDEN network
 - Importance to customer base
 - Meetings with vendors:
 - Grayson
 - Motorola
 - U.S. Wireless
 - CellLoc
- Status of network solution
 - Grayson testing/need for end-to-end solution
 - Need for software to integrate network solution
- Need for more timely responses from vendors
- Nextel Request for Waiver
 - Impact of denial of roaming on E-911 service

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ST. CLAIR COUNTY COMMUNICATIONS DISTRICT E-911

1610 Cogswell Avenue • Suite 208
Pell City, Alabama 35125
Telephone (205) 338-9911
Fax (205) 884-0228



Sharon Hardy
911 Coordinator

January 30, 2001

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FEB 26 2001

FCC MAIL ROOM

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

ORIGINAL

**Re: In the Matter of Automatic Roaming Obligations Pertaining to
Commercial Mobile Radio Services (WT Docket No. 00-193)**

Dear Ms. Salas:

The St. Clair County Commission oversees the implementation and operation of E-911 service in St. Clair County. We wanted to take this opportunity to state our view on the above-referenced proceeding, which is pending before the Federal Communications Commission. As you know, E-911 service is necessary to enable persons to make emergency calls on their mobile phones. We support the adoption of an automatic roaming rule because such a rule appears necessary to enable many mobile phone users in our community to utilize our E-911 services.

Over the past several years, we have spent considerable time and effort implementing the E-911 system for St. Clair County and ensuring that we will be able to provide service in accordance with the FCC's goals. However, it has been brought to our attention that iDEN (a digital technology used by SMR carriers) subscribers cannot make even basic 911 calls to our E-911 system if they are outside of their home carrier's coverage area, even though another iDEN carrier may offer coverage in the area in question. This problem is due to a lack of roaming agreements between iDEN carriers, which prevents subscribers from using their phones in our jurisdiction if they are outside their home carrier's service area. Because of the lack of technological compatibility between iDEN phones and any other wireless technology, including analog cellular, iDEN subscribers who today find themselves outside of their home carrier's coverage area are truly left with no means by which to call 911 if they were to need emergency assistance.

Our understanding is that iDEN subscribers' inability to call 911 in all instances would be solved if iDEN carriers entered into automatic roaming agreements. Due to the nature of the technology used by such carriers, they can only enter roaming agreements with carriers using similar technology (not cellular or PCS carriers). For whatever reason, however, they are not doing so. Although the St. Clair County Commission is not an advocate for any individual carrier -- we view and treat all carriers equally -- our overriding concern is to facilitate E-911 service to all persons using mobile phones in St. Clair County. Therefore, to ensure that all iDEN subscribers have the ability to enhance

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ST. CLAIR COUNTY COMMUNICATIONS DISTRICT E-911

1610 Cogswell Avenue • Suite 208
Fowl City, Alabama 35125
Telephone (205) 338-9911
Fax (205) 884-0228

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FCC MAIL ROOM



Sharon Hardy-Thomas
911 Coordinator

Ms. Magalie R. Salas
January 30, 2001
Page 2

their safety through the utilization of our system, we believe that adoption of an automatic roaming rule is in the public interest.

Thank you for considering our position on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Thomas".

Sharon Thomas
911 Coordinator
St. Clair County, Alabama

cc: Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau
Paul Murray, Wireless Telecommunications Bureau

bcc: Michael D. Rosenthal, Southern LINC

DOCKET FILE COPY ORIGINAL

ALABAMA WIRELESS 9-1-1 BOARD

P.O. Drawer 2160
Clanton, Alabama 35046-2160

Lee Helms, Chairman
Max Armstrong, Sec/Treas
Sen. Ted Little

Bill Meadows
Shelly Eslava
Rep. Mike Hubbard

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January 30, 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington DC, 20554

Dear Ms. Salas:

**Re: In the Matter of Automatic Roaming Obligations Pertaining to
Commercial Mobile Radio Services (WT Docket No. 00-193),**

The Alabama Wireless 9-1-1 Board oversees the implementation of wireless 9-1-1 service in the State of Alabama. I would like to take this opportunity to state my view on the above-referenced proceeding, which is pending before the Federal Communications Commission. As you know, 9-1-1 service is necessary to enable persons to make emergency calls on their wireless phones. I support the adoption of an automatic roaming rule because such a rule appears necessary to enable many wireless phone users in our community to utilize our 9-1-1 services.

Over the past several years, the board has spent considerable time and effort implementing the wireless 9-1-1 system in the State of Alabama and ensuring that it is provided in accordance with the FCC's goals. However, it has been brought to my attention that iDEN (a digital technology used by SMR carriers) subscribers cannot make even basic 9-1-1 calls if they are outside of their home carrier's coverage area, even though another iDEN carrier may offer coverage in the area in question. This problem is due to a lack of roaming agreements between iDEN carriers, which prevents subscribers from using their phones if they are outside their home carrier's service area. Because of the lack of technological compatibility between iDEN phones and other wireless technology, including analog cellular, iDEN subscribers who today find themselves outside of their home carrier's coverage area are truly left with no means by which to call 9-1-1 if they need emergency assistance.

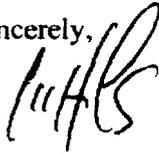
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Ms. Magalie R. Salas
January 30, 2001
Page 2

My understanding is that iDEN subscribers' inability to call 9-1-1 in all instances could be solved if iDEN carriers enter into automatic roaming agreements. Due to the nature of the technology used by such carriers, they can only enter roaming agreements with carriers using similar technology (not cellular or PCS carriers), but for whatever reason they are not doing so. Neither the Board nor I are advocates for any individual carrier, however our goal is to facilitate 9-1-1 service to all persons using wireless phones in Alabama. Therefore, to ensure that all iDEN subscribers have the ability to enhance their safety through the utilization of the 9-1-1 system, I believe that adoption of an automatic roaming rule is in the public interest.

Thank you for considering my position on this matter. If I can be of further assistance please contact me.

Sincerely,



Lee Helms
Chairman

LH: awf

cc: Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau
Paul Murray, Wireless Telecommunications Bureau

Dothan/Houston County E-9-1-1 District

Post Office Box 2128
Dothan, Alabama 36302
334/793-0356



March 19, 2001

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MAR 26 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: In the Matter of Automatic Roaming Obligations Pertaining to
Commercial Mobile Radio Services (WT Docket No. 00-193)**

Dear Ms. Salas:

The Dothan - Houston County Communications District oversees the implementation and operation of E-911 service in the City of Dothan and Houston County, Alabama. We wanted to take this opportunity to state our view on the above-referenced proceeding, which is pending before the Federal Communications Commission. As you know, E-911 service is necessary to enable persons to make emergency calls on their mobile phones. We support the adoption of an automatic roaming rule because such a rule appears necessary to enable many mobile phone users in our community to utilize our E-911 services.

Over the past several years, we have spent considerable time and effort implementing the E-911 system for the City of Dothan and Houston County, Alabama, and ensuring that we will be able to provide service in accordance with the FCC's goals. However, it has been brought to our attention that iDEN (a digital technology used by SMR carriers) subscribers cannot make even basic 911 calls to our E-911 system if they are outside of their home carrier's coverage area, even though another iDEN carrier may offer coverage in the area in question. This problem is due to a lack of roaming agreements between iDEN carriers, which prevents subscribers from using their phones in our jurisdiction if they are outside their home carrier's service area. Because of the lack of technological compatibility between iDEN phones and any other wireless technology, including analog cellular, iDEN subscribers who today find themselves outside of their home carrier's coverage area are truly left with no means by which to call 911 if they were to need emergency assistance.

Our understanding is that iDEN subscribers' inability to call 911 in all instances would be solved if iDEN carriers entered into automatic roaming agreements. Due to the nature of the technology used by such carriers, they can only enter roaming agreements with carriers using similar technology (not cellular or PCS carriers). For whatever reason, however, they are not doing so. Although the Dothan-Houston County Communications

Ms. Magalie R. Salas

Page 2

District is not an advocate for any individual carrier -- we view and treat all carriers equally -- our overriding concern is to facilitate E-911 service to all persons using mobile phones in the City of Dothan and Houston County, Alabama. Therefore, to ensure that all iDEN subscribers have the ability to enhance their safety through the utilization of our system, we believe that adoption of an automatic roaming rule is in the public interest.

Thank you for considering our position on this matter.

Sincerely,



**Captain Jim Smith
9-1-1 Coordinator**

**cc: Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau
Paul Murray, Wireless Telecommunications Bureau**