

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

In the Matter of )  
 )  
Revision of the Commission’s Rules To ) CC Docket No. 94-102  
Ensure Compatibility with Enhanced )  
911 Emergency Calling Systems )

**REPLY COMMENTS OF  
THE CELLULAR TELECOMMUNICATIONS & INTERNET ASSOCIATION**

The Cellular Telecommunications & Internet Association (“CTIA”)<sup>1</sup> hereby submits its Reply Comments to the above captioned proceeding.<sup>2</sup>

**I. INTRODUCTION**

In response to the Commission’s Public Notice requesting further comment on Section 20.18(j) of the Commission’s rules, CTIA provided specific, objective criteria that the Commission should adopt to “assure that [the PSAP] will be able to receive and utilize E-911 data prior to the delivery of service by the carrier.”<sup>3</sup> After carefully assessing the technical considerations underlying a request for Phase II service, CTIA determined that the lack of an ALI interface, outdated CPE, or the inability of a PSAP or

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<sup>1</sup> CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service (“CMRS”) providers and manufacturers, including cellular, broadband PCS, ESMR, as well as providers and manufacturers of wireless data services and products.

<sup>2</sup> See *Wireless Telecommunications Bureau Seeks Further Comment on the Commission’s Rules Concerning Public Safety Answering Point Requests for Phase II Enhanced 911*, Public Notice, CC Docket No. 94-102 (rel. July 10, 2001) (“Public Notice”).

<sup>3</sup> Public Notice at 2.

its vendors to support implementation could cause unnecessary delays to Phase II deployment.

In its Comments, CTIA proposed that the Commission adopt the following three prerequisites for a Phase II request to be valid: 1) the PSAP's ALI database meets the J-STD-036 E2 interface standard or a qualifying interim solution; 2) the PSAP's CPE must be certified to either be able to utilize the latitude, longitude and confidence level data or the PSAP's management have entered into a contractual agreement with a vendor that will provide this capability within six months of the date of the Phase II request; and 3) the PSAP is able to provide the data necessary to support Phase II deployment. These requirements are in addition to the Commission's present rules, which require that a PSAP make a valid request for Phase II service and that a PSAP has an adequate cost recovery mechanism in place. CTIA reaffirms its commitment to implementation of E-911 Phase II service and urges the Commission to assist the timely deployment of Phase II by adopting CTIA's proposal.

## **II. DISCUSSION**

The majority of commenters agree that the Commission should adopt prerequisites to ensure PSAP readiness.<sup>4</sup> While commenters can disagree on the details of these requirements, the Commission should not lose sight of the fact that the misallocation of resources will delay the provisioning of Phase I and Phase II services.

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<sup>4</sup> See City of Richardson, Texas Comments, CC Docket No. 94-102 (July 25, 2001) ("Richardson Comments"); NENA and APCO Comments, CC Docket No. 94-102 at 2 (July 25, 2001); Tarrant County 9-1-1 District Comments, CC Docket No. 94-102 at 3 (July 25, 2001); Texas 9-1-1 Agencies Comments, CC Docket No. 94-102 at 2-5 (July 25, 2001); National Telephone Cooperative Association Comments, CC Docket No. 94-102 at 3 (July 25, 2001);

By ensuring the readiness of PSAPs and their vendors, the Commission will facilitate and expedite the deployment of Phase II. The public will ultimately benefit by having specific criteria that clearly delineate when carrier obligations are triggered.

Unfortunately, many of the comments filed by the public safety community in this proceeding merely urge the Commission to “keep the prerequisites simple and minimal” and largely fail to provide any explanation of the criteria that should be adopted by the Commission.<sup>5</sup> One commenter claims that a PSAP satisfies any obligation to demonstrate that it is capable of receiving and utilizing data merely by electing to “make a showing,” and a carrier is foreclosed from requesting further verification.<sup>6</sup>

In response to the Commission’s directive to provide objective criteria, CTIA submitted a sample letter of certification and a detailed explanation of the technical issues in support of its position that the Commission adopt three straight-forward certification requirements that a PSAP must demonstrate at the time it makes its request.

First, the PSAP must certify that its ALI database meets the J-STD-036 E2 interface standard or if the PSAP’s ALI vendor is unable to provide E2 interface, the PSAP can document its ability to support an interim solution. The City of Richardson concedes in its Comments that “it is reasonable for the public safety entity to demonstrate that it has made arrangements with the incumbent local exchange carrier for delivery in a timely fashion” for purposes of supplying the necessary trunking, the ALI database, and any other necessary facilities or capabilities.<sup>7</sup> However, the City of Richardson fails to

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<sup>5</sup> See Comments of Tarrant County 9-1-1 District at 2;

<sup>6</sup> See Richardson Comments at 4.

<sup>7</sup> Richardson Comments at 4.

elaborate on the specific capabilities or arrangements that a PSAP should be required to verify at the time it makes its request for Phase II. As CTIA emphasized in its Comments, it is essential that the PSAP provide adequate assurances to wireless carriers that the appropriate interface is in place since it is the PSAP that is the customer of the ALI service provider.<sup>8</sup> Furthermore, the certification requirements will assist a PSAP reach an agreement with its ALI service provider at an earlier point in time, which will assist in the smooth deployment of Phase II.

Second, CTIA's Comments urge the Commission to require a PSAP to certify that its CPE is able to utilize the latitude, longitude and confidence level data, or that the PSAP's management has entered into a contractual agreement with a vendor that will provide this capability within six months of the date of the Phase II request. While individual PSAPs state that it is bad faith to require documentation, the majority of PSAPs agree that the existence of vendor contracts demonstrate that a PSAP has taken sufficient steps to assure that it will be capable of receiving and utilizing E-911 data.<sup>9</sup> As CTIA noted in its Comments, a PSAP must be in a position to declare that its CPE is, or will be, capable of using the Phase II data, and that necessary technology or operational upgrades will be made as needed to allow the PSAP to utilize the Phase II data.

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<sup>8</sup> Since the PSAPs are the customer, they must request the J-STD-036 E2 Interface from their 9-1-1 ALI services provider.

<sup>9</sup> See Comments of Gregory S. Ballentine, 9-1-1 Program Manager at 1-2; Richardson Comments at 2. See also Texas 9-1-1 Agencies Comments at 2 (stating that "it should be presumed a PSAP is ready if the public safety entity. . . represents it has written commitments from its PSAP vendors that within the six-month wireless carrier deadline: (1) the PSAP's 9-1-1 Customer Premises Equipment will be capable of receiving and utilizing the data elements for wireless E9-1-1 Phase II service.").

Otherwise, the location data and confidence data will be rendered meaningless to the call-taker.

Finally, the third certification prerequisite requires that the PSAP can provide the data necessary to support Phase II deployment, and that the PSAP's management is ready to provide the necessary administrative support needed in a cooperative effort. One commenter stating that the criteria adopted by the Commission should be bright line rules, also argued that "it should be sufficient if the PSAP can show that it has a plan to accomplish the necessary installations."<sup>10</sup> CTIA agrees that each PSAP's "plan" will be unique; however, that does not alleviate the need for demonstrable criteria that will indicate whether a PSAP is capable of receiving and utilizing data. Indeed, the ability of PSAPs and wireless carriers to anticipate the resources that must be allocated for Phase II implementation is crucial to the successful deployment of E-9-1-1 Phase II.

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<sup>10</sup> See Richardson at 5.

**III. CONCLUSION**

For these reasons, CTIA respectfully requests that if the Commission determines it needs to clarify its rules, that the Commission adopt certification prerequisites consistent with the proposals made in these Reply Comments.

Respectfully submitted,

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Sarah Leeper  
Staff Counsel

Michael F. Altschul  
Senior Vice President & General Counsel

**CELLULAR  
TELECOMMUNICATIONS  
& INTERNET ASSOCIATION**

1250 Connecticut Ave., N.W., Suite 800  
Washington, D.C. 20036

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