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August 8, 2001

Via Hand Delivery

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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AUG - 8 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Reply Comments of CenturyTel Wireless, Inc.
CC Docket No. 94-102, RM-8143

Dear Ms. Salas:

On behalf of CenturyTel Wireless, Inc. ("CenturyTel"), enclosed please find an original and six (6) copies of CenturyTel's reply comments in response to the Commission's Further Notice of Proposed Rulemaking in the above-referenced docket.¹ Four (4) copies are provided for association with CC Docket No. 94-102 and an additional two (2) copies are included for association with RM-8143.

Should you have any questions or require additional information regarding this matter, please contact the undersigned at (202) 424-7500.

Very truly yours,

Nancy Killien Spooner
Jeanne W. Stockman

Counsel to CenturyTel Wireless, Inc.

Enclosures

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¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Further Notice of Proposed Rulemaking, CC Docket No. 94-102, RM-8143 (rel. May 25, 2001).

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

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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 RM-8143
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REPLY COMMENTS OF CENTURYTEL WIRELESS, INC.

CenturyTel Wireless, Inc. ("CenturyTel"), through its undersigned counsel, hereby submits its reply comments on the Commission's Further Notice in the above-referenced proceeding.¹ In the Further Notice, the Commission explores the feasibility of various technical and non-technical means to remedy issues associated with the lack of call-back functionality in non-initialized handsets. CenturyTel generally supports the comments filed by CTIA in this proceeding and respectfully submits that a broad public education campaign, rather than a regulated or technical solution, is likely the most effective and efficient means to inform consumers about the limitations of using non-initialized handsets.

¹ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, RM-8143, Further Notice of Proposed Rulemaking (rel. May 25, 2001) ("Further Notice").

I. USE OF TEMPORARY LOCAL DIRECTORY NUMBERS IS NOT A VIABLE MEANS TO PROVIDE CALL-BACK FUNCTIONALITY TO NON-INITIALIZED HANDSETS.

There are several drawbacks to the Commission's proposal to employ a variation of Temporary Local Directory Numbers ("TLDNs") to provide call-back capability for non-initialized handsets.² This alternative has previously been considered and rejected by the Telecommunications Industry Association.³ As other commenters note, to support call-back, TLDNs must be translated into unique subscriber codes. For non-service initialized subscribers, the TLDN may be mapped to a number programmed into a handset by the manufacturer or a previous user. One problem that arises is that this number may be subsequently assigned to a new, subscribed user, causing the call-back to be misdirected to the subscribed user rather than the unsubscribed user.⁴ Once wireless local number portability is implemented, the potential for misdirected call-backs would increase further.⁵ Moreover, assigning unique subscriber codes to each non-initialized handset would thwart the Commission's number conservation efforts. In light of these drawbacks, CenturyTel respectfully submits that employing a variation of TLDNs does not present a viable technical solution to provide call-back functionality for non-initialized handsets. Absent a technical solution, CenturyTel believes it is necessary to educate consumers about the limitations of non-initialized handsets so they have appropriate expectations regarding E911 service.

² Further Notice, ¶ 8.

³ See Comments of the Cellular Telecommunications and Internet Association filed July 9, 2001 in CC Docket No. 94-102 at p. 5 ("CTIA Comments").

⁴ See, e.g., Comments of AT&T Wireless Services, Inc. filed July 9, 2001 in CC Docket No. 94-102 at p. 2.

⁵ See CTIA Comments at pp. 7-8.

II. A BROAD PUBLIC EDUCATION CAMPAIGN, RATHER THAN A REGULATED SOLUTION, IS LIKELY THE MOST EFFECTIVE AND EFFICIENT MEANS TO INFORM CONSUMERS OF THE LIMITATIONS OF NON-INITIALIZED HANDSETS.

CenturyTel is concerned about the lack of call-back capability for non-initialized handsets and is supportive of the need to educate consumers about the limitations of these handsets. CenturyTel questions, however, whether a regulatory solution would be the most effective and efficient means of achieving this goal.

The Commission proposes a labeling solution as a means to educate consumers of the limitations of non-initialized handsets. While CenturyTel certainly supports the Commission's consumer education goals, it agrees with CTIA that a labeling requirement should not be mandated for wireless handsets. As an initial matter, because many wireless handsets are donated to charitable groups after their initial use, it would be very difficult to ensure that a required label would still be on the handset when donated. Moreover, to ensure that both carriers and non-carriers alike continue to participate in donation programs, and to achieve maximum consumer education, carriers and non-carriers must be subject to the same labeling rules. It is unclear, however, how the Commission would enforce a labeling requirement on non-carriers that participate in phone donation programs, but are not subject to the Commission's jurisdiction.⁶ These issues seriously undermine the potential effectiveness of a Commission-imposed labeling requirement.

Instead of a regulated solution, CenturyTel favors a broad public education campaign to inform consumers about the limitations of using non-initialized handsets as proposed by CTIA.⁷

⁶ CTIA Comments at p. 11.

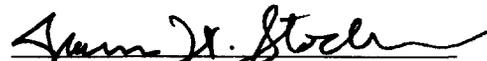
⁷ *Id.* at pp. 12-13.

Such a solution stands to have a broader reach than a Commission-imposed labeling requirement, and would not place an undue burden on wireless carriers.

III. CONCLUSION

CenturyTel respectfully submits that an inherent risk of using a non-initialized handset is the lack of call-back functionality. CenturyTel is unaware of a technical solution to remedy the call-back issue, and believes there are several drawbacks to the Commission's proposal to employ a variation of TLDNs to provide call-back capability. CenturyTel respectfully requests the Commission to refrain from imposing additional requirements on wireless carriers to remedy this issue. Rather than a regulated solution, CenturyTel respectfully submits that a broad public education campaign is likely the most effective means to inform consumers about the limitations of using non-initialized handsets.

Respectfully submitted,



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Dated: August 8, 2001

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