Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's	)	
Rules to Ensure Compatibility	)	CC Docket No. 94-102
With Enhanced 911 Emergency	)	
Calling Systems	)	
	)	
	)	
Request for Waiver	)	DA-01-1866
ALLTEL Communications, Inc.	)	

To: The Commission

Reply Comments of ALLTEL Communications, Inc.

ALLTEL Communications, Inc. ("ALLTEL") hereby submits its reply comments in response to the Commission's Public Notice[1] on its petition for waiver of sections 20.18(e) and (g) of the Commission's rules. Motorola, Lucent, AT&T and CTIA commented favorably on ALLTEL's waiver. APCO, NENA and NASNA (the "Public Safety Organizations") while not explicitly opposing the waiver request[2], believe that ALLTEL has not yet demonstrated a basis for the grant of its waiver. The Public Safety Organizations, nonetheless incorporate into their comments on the ALLTEL waiver, their

[1] See, Public Notice, DA 01-1866 (Released August 6, 2001) (the "Public Notice")

[2] The Public Safety Organizations in their four pages of comments, appear to grudgingly acknowledge that the ALLTEL waiver is among the more detailed requests filed with the Commission noting that "… it has at least come forward with a proposed (albeit vague) implementation schedule." Comments of APCO, NENA and NASNA at page 2.

comments on the waiver requests filed by other CDMA carriers, including Qwest, Verizon and Sprint, "…to the extent relevant to ALLTEL."[3]

ALLTEL reiterates its commitment to both the expeditious deployment of its proposed AGPS Phase II E-911 solution and to providing the most accurate location data available to PSAPs. ALLTEL's waiver was limited in duration, and, like those of other carriers, proposed an aggressive deployment schedule directly linked to the commercial availability of upgrades and equipment from its various vendors. The time frames set forth in the ALLTEL waiver were supported by vendor letters and other documentation detailing the commercial availability dates for both network components and AGPS handsets. The commercial availability of these upgrades and equipment, including handsets, delineate the ultimate the reality in Phase II E-911 deployment. Yet, an open acknowledgement of this reality (and an acquiescence to the minor delays carriers will encounter as they continue good faith attempts to deploy this still novel technology) continues to evade the Public Safety Organizations despite the fact that it is now generally accepted that AGPS solutions will ultimately provide the most accurate ALI data and best serve the public interest in the long term.[4]

The bulk of the Public Safety Organizations comments on ALLTEL's waiver are directed to ALLTEL's deployment schedule for AGPS assisted handsets. ALLTEL's handset deployment schedule is consistent with that proposed by other carriers, and was

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[3] Comments of APCO, NENA and NASNA at page 2. Similarly, ALLTEL incorporates the replies of the other carriers to the comments of Public Safety Organizations on their particular waiver. Specifically, ALLTEL finds Qwest's reply Comments particularly instructive. See, Reply to Comments on Qwest Wireless' Waiver Petition filed August 30, 2001.

[4] In this connection, ALLTEL notes that unlike other carriers, it has remained committed to the AGPS solution since well before the filing of its November, 2000 technology report with the Commission. ALLTEL's choice of an AGPS solution, and the potential need for a waiver, has been a matter of public record since that time.

based upon the emergence of consumer demand for 3G handsets and the need for ALLTEL to avail itself of the efficiencies of its existing relationships with its core handset vendors. None of these vendors, as noted in the waiver, intend to produce a handset using the Qualcomm 3300 chipset. As noted by Verizon in its reply to the comments of the Public Safety Organization to its waiver request, " … meeting the prescribed benchmarks entails not only the availability of adequate commercial volumes, but also widespread consumer demand and acceptance."[5] ALLTEL concurs and notes that it would be the rare consumer, indeed, who would pay a premium price for a handset which is to be outmoded within a matter of months. Consequently handset obsolescence is a legitimate concern if consumers are to be sufficiently motivated to purchase AGPS capable handsets in volume.

ALLTEL noted in its waiver that the penetration of AGPS handsets will vary from carrier to carrier to some degree based upon a number of factors including the carrier's mix of vendors, the number of handsets needed to be sold to comply with the penetration requirements, and other technology factors specific to the carriers. ALLTEL, like Verizon, with whom it has a roaming arrangement, must also use tri-mode phones, a technology issue that sets ALLTEL apart from the various PCS carriers, who have encountered their own hurdles with vendors.

The Public Safety Organizations are critical of the absence in ALLTEL's waiver of an "accurate" interim location solution. ALLTEL noted in its waiver request at pages 35-36 that it continues to consider promising interim solutions, but it has not yet concluded that any interim solution is available and sufficiently "accurate" to justify the

[5] See, Reply Comments of Verizon Wireless, filed August 31, 2001 at page 7.

diversion of time and other resources from its ongoing efforts deploy AGPS, its ultimate Phase II solution.

AGPS, and all of its promise, is on the verge of deployment. But all the parties interested in Phase II deployment must be mindful that AGPS is still a new and novel technology. Consequently, given the nature of technology development, there will continue to be minor hurdles in the path to full deployment. The delay in availability of the Phase II network upgrades for Lucent switches noted by ALLTEL and other carriers evidences this point clearly.

Motorola, however, has echoed in its comments on ALLTEL's waiver a major caveat first made known to ALLTEL in Motorola's comments on Verizon's waiver request. Specifically, while concurring with ALLTEL's network deployment schedule, Motorola notes at page 4 of its comments that ALLTEL's use of a Lucent MPC/PDE "will add significant additional software development work for Motorola and will push back considerably a first office application of Motorola's network components to a later release in the end of 2002 or early in year 2003.[6] This statement neither comports with Motorola's concurrence in ALLTEL's deployment schedule, nor the dates contained in the support letter provided to ALLTEL by Motorola and attached to Appendix B of the ALLTEL waiver request.[7] Lucent has continued to maintain that its MPC/PDE are fully J-STD 036 compliant.

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[6] See, Comments of Motorola, Inc. filed August 27, 2001 at page 4.

[7] In pertinent part, this letter specifically states " Motorola has reviewed the requirements of your third party vendor for the Mobile Positioning Center (MPC) and the Position Determining Entity (PDE) to interface with the Motorola equipment in your network, and will offer feature FR4409 for E-911 Phase II support." See ALLTEL Petition for Waiver, Appendix B, Letter of Motorola dated May 25, 2001. A review of ALLTEL's internal documentation of vendor discussions and joint meetings with Lucent and Motorola (some of which dates back to 2000) indicates that ALLTEL's choice of a Lucent MPC/PDE was made known to Motorola personnel well in advance of the May 25, 2001 date.

It is ALLTEL's understanding that the controversy between its two vendors is related to an "optional" parameter under J-STD-036 designated as OWD2, a network function related to the provision of AFLT assistance in handset-based solutions. ALLTEL will continue to work diligently with its vendors and continue to drive toward better communications and Phase II compliance at the earliest date. ALLTEL, does, however, raise this matter to demonstrate the types of issues carriers face, and will continue to face, as they go forward with deployment plans. The Commission must note the considerable resources carriers must dedicate to coordinating the efforts of their various vendors, most of whom are arch rivals in their own marketplace and over whom neither the carriers nor the Commission have control.

In conclusion, ALLTEL believes that the Public Safety Organizations and the Commission have brought the public a great victory in taking Phase II technology from the drawing board to the verge of deployment. ALLTEL seeks only to join with the Public Safety Organizations and devote their joint resources to deployment. ALLTEL's waiver request should be granted.

Respectfully submitted,

ALLTEL Communications, Inc.

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